

13 June 2024

s9(2)(a)
s9(2)(a)
By email: s9(2)(a)

Tēnā koe s9(2)(a)

Thank you for your request, received on 15 May 2024, under the Official Information Act 1982 (the Act) for the following information:

1. *“Was there a period during the Covid response when retailers were not allowed to disconnect residential customers for non-payment?”*
2. *If so, for what dates did that apply?*
3. *Please can I have any data on arrears / customer debt levels over this period, and for one year following. I am trying to understand what levels of debt resulted from customers remaining connected when they were struggling financially.*
4. *Please can I have any data on arrears/debt written off over that period, and for one year following.*
5. *Was there any similar ban on disconnections of commercial customers? If so, what debt levels arose as a result?”*

Request 1

Electricity retailers implemented their own policies voluntarily to prevent customers from being disconnected for non-payment during the Covid-19 response. However, during the Covid-19 lockdowns, the Authority communicated to retailers the Authority’s expectations under the Consumer Care Guidelines.

The Authority has attached three letters that were published on our website. These letters provide additional information about the Authority’s guidance to electricity retailers during the Covid-19 response.

Request 2

Due to retailers adopting their own policies on disconnections during the Covid-19 response, the Authority does not know the exact dates those policies were in effect.

Requests 3 and 4

Please see the Excel spreadsheet attached that includes the following data from December 2019 to September 2022:

- number of customer accounts where the latest invoice has not been paid by the due date
- total debt from customers that are in arrears by up to 30 days (\$)
- number of customer accounts where the invoice payment is more than 30 days overdue and the ICP supplied has not been scheduled for disconnection

- total debt from customer accounts where the invoice payment is more than 30 days overdue and the ICP supplied has not been scheduled for disconnection (\$)
- total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)
- total debt from customers disconnected for non-payment (\$)
- total overdue debt from customer non-payment in this market segment (\$)
- total customer debt written off during the period (\$).

Please note the table has been prepared based on information provided to the Authority and the Authority does not confirm its accuracy. As various retailers may have different interpretations of the Authority's request for this information, caution should be taken when drawing conclusions from the data.

Request 5

There was no ban on disconnections for commercial customers issued by the Authority. The attached spreadsheet includes data pertaining to commercial customers as well as residential.

Proposed improvements to retail monitoring

We recently consulted on improvements to our monitoring of the retail market via a new retail market data request. We intend to release a short consultation on the perceived costs and benefits of this notice soon, which you are welcome to submit on. More information on this project is available on [our website](#). Improving monitoring of the retail market will enable us to better monitor the Consumer Care Guidelines, which, as [we recently announced](#), will be made mandatory from 1 January 2025.

Your right to investigation and review by the Ombudsman

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

If you wish to discuss this decision with us, please feel free to contact us by emailing oa@ea.govt.nz.

Nāku noa, nā,



Airihi Mahuika
GM Legal, Monitoring and Compliance

8 April 2020

Dear electricity retailer,

Electricity retailers' duty of care for domestic consumers during Covid-19

The nationwide lockdown to contain the Covid-19 virus has rapidly changed New Zealanders' lives and the electricity landscape to which industry needs to respond.

Many customers now face circumstances that can affect their ability to pay for essential services like electricity.

Your customer focus and actions will help New Zealand's citizens get through this difficult time.

Vulnerable and medically dependent consumers

We expect companies to be prioritising customer and staff safety, and we acknowledge and support the hard work many participants have been doing already to support their vulnerable customers.

Given the alert level 4 response to Covid-19 and the stringent lockdown requirements, there will be increased pressure on some of your customers' health and/or finances. The number of electricity consumers classified as vulnerable or medically dependent will now be higher and may continue to grow.

When delivering electricity services to vulnerable consumers, please refer to the Authority's *Medically Dependent Guidelines*²¹, and the *Vulnerable Consumer Guidelines*²².

These guidelines aim to ensure that:

- a) a medically dependent consumer is not electrically disconnected for non-payment of an electricity invoice, and
- b) a vulnerable consumer should be electrically disconnected **only as an act of absolute last resort once all other options have been exhausted**, providing that the consumer is acting in good faith.

The Authority expects participants to follow the processes and recommendations set out in the guidelines when engaging with and managing domestic customers who are medically dependent or unable to pay their electricity bills.

21 <https://www.ea.govt.nz/dmsdocument/8564-guidelines-arrangements-to-assist-medically-dependent-consumers>

A Medically Dependent Consumer is a domestic consumer who is dependent on mains electricity for critical medical support, such that loss of electricity may result in loss of life or serious harm. For the avoidance of doubt, medical dependence on electricity could be for use of medical or other electrical equipment needed to support the treatment regime.

22 <https://www.ea.govt.nz/dmsdocument/8565-guidelines-on-arrangements-to-assist-vulnerable-consumers>

A Vulnerable Consumer is a domestic consumer who:

- (a) for reasons of age, health or disability, the disconnection of electricity to that domestic consumer presents a clear threat to the health or wellbeing of that domestic consumer; and/or
- (b) it is genuinely difficult for the domestic consumer to pay his or her electricity bills because of severe financial insecurity, whether temporary or permanent.

While Covid-19 continues to affect the country, and particularly during alert level 4, the Authority considers that **every customer experiencing payment difficulty should be treated as a vulnerable consumer**, as per the guidelines. The intent of the guidelines is to provide time for retailers to assist their customers in accessing the financial support mechanisms provided by the Government. While demand for this support is currently extremely high, it is important that retailers give their customers more time to access the support they need.

We are responsible for monitoring retailers' compliance with both sets of guidelines and will contact you again soon to seek assurance that your internal processes align with those guidelines. In the meantime, we are investigating whether making these guidelines mandatory requirements in the Code would be in the long-term interests of consumers.

The Electricity Industry Act 2010 explicitly allows for the Authority to use facilitation measures, such as Guidelines, instead of imposing Code requirements. Guidelines provide for greater flexibility in the delivery of responses to best suit individual consumers and their circumstances, more innovation in delivery of outcomes and encourage participants, in a competitive market, to go above and beyond standardised provision. Retailers have generally seized the opportunities when the Authority has used the facilitation approach. The Authority believes the current circumstances will demonstrate this again but is prepared to move under urgency to codify obligations, if the actions of even a single retailer makes this desirable in the interests of consumers.

We are also writing to Metering Equipment Providers to remind them of these guidelines.

Customer communications

We acknowledge many retailers have recently contacted their customers to encourage them to reach out if they need special assistance. Many of you have also published additional information on your websites.

We encourage retailers to continue this action especially for customers that may be in financial stress, and we expect you to:

- Remind your customers to let you know if they are now vulnerable and/or medically dependent.
- Encourage your customers to explore your flexible payment terms to help manage their financial situation, and your cashflow.
- Encourage your customers to explore income supplements and other advice from social and support agencies, if required, and support them in doing so.
- Advise your customers on where to seek information and help on energy efficiency measures – for example EECA's website, or by referencing your own material.
- Clarify whether your customers expect to use more power than normal. If they do, or are on a low fixed charge/high variable charge tariff, remind them of their options and offer a more suitable plan or temporary solution.
- Offer customers on expensive legacy pricing new plans that are current and more competitive – regardless of their contracted period.
- Remind your customers of their options to observe and monitor their own consumption levels, including providing you with their own meter readings if possible.
- To prevent 'bill shock', advise your customers on how their consumption has lifted or is changing during the lockdown period.

Understanding and reducing financial stress on your business

The Authority is working closely with agencies and industry to give ongoing certainty during this extraordinary time. Our priority is ensuring a secure and reliable supply of electricity for New Zealand electricity consumers.

We have heard the concerns of increasing debt for many retailers as they manage a growing number of customers unable to pay their electricity bill.

The Authority would like to remind you of some immediate options already available.

If you have cash on deposit with the Clearing Manager, you may:

1. Request the Clearing Manager refund excess cash, within reason
2. Apply to the Authority for a shortened post-default exit period, which would reduce the level of prudential security required and/or
3. Where you can demonstrate materially reduced demand across your portfolio, talk with the Clearing Manager to review your prudential security obligation.

We want to engage and work with you on this issue, with urgency. I have set up a stakeholder working group under James Tipping to lead this work. The Commerce Commission is represented on this group. Means to manage any potential issues from industry parties who are in competition with one another holding discussions have been developed.

We are working to understand what actions may be possible, in what timeframes, and what the consequences may be. Any actions taken will need to be objective and supported by evidence, and we are considering what data we will need from you to assist decision-making. We encourage you to provide any relevant information to us so we can best understand the extent of the issue as it relates to your business and end consumers, and appreciate offers we have already received.

All information will be treated in confidence and used only for the purposes of understanding your current and projected financial position in response to Covid-19.

Please remember that you have an obligation to advise the Clearing Manager immediately if at any time you believe you cannot (or will not be able to) pay all or part of your prudential call, or your settlement invoice (see clause 14A.17 of the Code). **This means that if you have reason to be concerned over your ability to pay, now or at any point in future, you must advise the Clearing Manager.**

We appreciate the shift to home-based working has presented significant challenges to business continuity. Thank you for your organisation's continued efforts to serve your customers during this time.

Yours sincerely



James Stevenson-Wallace
Chief Executive

20 August 2021

Dear electricity retailer,

Consumer care under COVID-19 lockdowns

The COVID-19 virus and the country's response – in particular, the stringent requirements under Alert Levels 3 and 4 – may result in additional financial or health pressures for many New Zealand households.

We appreciate the immediate actions you have already taken to support your customers since the Alert Level 4 lockdown came into effect this week. As they did in 2020, your consumer focus and actions will help New Zealanders get through this difficult time.

Consumer care guidelines¹ for domestic consumers

The Authority's consumer care guidelines (guidelines) took effect on 1 July 2021. The guidelines focus on electricity retailers providing a consistent and supportive standard of service.

Part 1 of the guidelines recognises "*Electricity is important to the health, wellbeing and social participation of people and whānau in communities*". Under this principle, electricity retailers should:

- work proactively to minimise harm caused by difficulty accessing electricity (including by disconnection)
- keep customers connected, avoiding disconnection for an unpaid electricity invoice, and only use disconnection as a last-resort measure.

The guidelines recommend that disconnections for non-payment, of both post- and pre-pay customers, should not occur at a time that may endanger the wellbeing of the customer or any consumer at the premises (paragraphs 66 and 73). The Authority considers pandemic-related lockdowns (including under COVID-19 Alert Levels 3 and 4 as currently defined) fit this criterion.

We acknowledge any rapid shift to home-based working presents challenges to business continuity. Thank you for your organisation's continued efforts to serve your customers and consumers, and respond to the ongoing effects of the pandemic.

Yours sincerely



James Stevenson-Wallace
Chief Executive

¹ To read the consumer care guidelines and access associated resources, visit <https://www.ea.govt.nz/consumer-care>

22 April 2020

Letter to electricity retailers: ongoing industry response to COVID-19

Dear ,

As an essential service, electricity has an important role in protecting and supporting business and domestic consumers through both the current lockdown and the period of economic recovery which will follow.

Vulnerable and medically dependent consumers

On 8 April 2020 we wrote to you setting out our expectations in relation to the delivery of electricity services to medically dependent and vulnerable domestic customers. That letter recorded our expectation that every domestic consumer experiencing payment difficulty should be given sufficient time to access the support they need before any last-resort options such as disconnection are considered. We have also written to the Metering Equipment Providers advising them of our expectations in relation to these domestic customers. We acknowledge and appreciate that a number of you were already meeting or exceeding this expectation before we wrote to you.

In that letter we said we would contact you again to seek assurance that your internal processes align with the medically dependent consumer (MDC) guidelines⁵³ and the vulnerable consumer (VC) guidelines⁵⁴. The Authority is now requesting that assurance from you that your company follows the processes set out in both of these guidelines, in full. Please provide this assurance to the Authority in writing or email (marketoperations@ea.govt.nz) by no later than 5pm, 28 April 2020.

Potential increased debt

More generally, we are concerned about the prospect that the COVID-19 pandemic will lead to increased levels of non-payment and ultimately, new bad debt as households and small and medium-sized enterprises (SMEs) default. We know this concern is shared across the whole sector.

53 <https://www.ea.govt.nz/dmsdocument/8564-guidelines-arrangements-to-assist-medically-dependent-consumers>

A Medically Dependent Consumer is a domestic consumer who is dependent on mains electricity for critical medical support, such that loss of electricity may result in loss of life or serious harm. For the avoidance of doubt, medical dependence on electricity could be for use of medical or other electrical equipment needed to support the treatment regime.

54 <https://www.ea.govt.nz/dmsdocument/8565-guidelines-on-arrangements-to-assist-vulnerable-consumers>

A Vulnerable Consumer is a domestic consumer who:

(a) *for reasons of age, health or disability, the disconnection of electricity to that domestic consumer presents a clear threat to the health or wellbeing of that domestic consumer; and/or*

(b) *it is genuinely difficult for the domestic consumer to pay his or her electricity bills because of severe financial insecurity, whether temporary or permanent.*

As you will be aware, the Authority has issued an information request which seeks to improve the understanding of the size and scope of the debt issues. We encourage all participants to be active in managing the financial risks that may result from retailers carrying a higher debt burden in the short term.

Retailer response to COVID-19

We are aware and pleased that a number of retailers have already responded to the pandemic with actions such as amending price plans, waiving fees and offering flexible payment arrangements, as well as providing practical support, such as assisting their domestic customers to explore income supplements and other support from Government agencies. As noted in our last letter, we expect all retailers to be taking such actions proactively. We have launched a campaign to encourage domestic electricity consumers to talk to their electricity retailers about their options.

In addition, we expect retailers, to the extent practicable, to be considering options to support SMEs facing challenges to pay their electricity bills during COVID-19 lockdown and the subsequent recovery period.

We are encouraged that some network companies are offering amended price plans and/or flexible payment arrangements to alleviate the impacts of COVID-19 on the end users of their services. While pricing is a matter for individual retailers, we support the principle that, as much as a retailer can, these COVID-19 specific adjustments should be broadly passed on to the relevant end users. We recognise this may be challenging for some retailers in the short term, but we consider this a desirable outcome for consumers in the medium term. We encourage network companies and retailers to discuss and resolve any practical issues that might be encountered in achieving this objective.

We have heard and understood interest from network companies regarding whether (and to what extent) the network charge adjustments which took effect on 1 April 2020 passed through into the retail electricity market. As part of our ongoing market monitoring it is our intention to commence a review in October 2020 of how these network pricing changes affected retail pricing.

Fees charged to consumers

In addition, we have heard concerns expressed by consumer groups regarding wide variation in fees being charged by retailers during the pandemic period. We expect retailers to review all their fees – such as for disconnection, reconnection or late payment – and ensure they are justified, clearly communicated and understood. Such fees should only reflect the reasonable costs associated with the provision of the service.

Collectively these actions will ensure the sector provides much-needed support to its domestic and small business consumers.

Monitoring the industry's response to COVID-19

It is our intention to formally review the industry response at the end of the pandemic period, including, as discussed above, the significant efforts retailers have already gone to in order to meet their customers' needs. The exact nature of any review will be decided in the future, but for now, retailers should assume it will consider the following:

- the extent to which retailers adhered to the guidelines that apply to medically dependent and vulnerable customers
- the arrangements retailers put in place to assist domestic consumers and SMEs
- the extent to which retailers passed on any COVID-19 related price adjustments from networks
- the fees charged by retailers to domestic consumers and SMEs in the pandemic period relative to the cost of providing the underlying services
- the increase or decrease in costs borne by retailers as a result of COVID-19.

We acknowledge that, regardless of any assistance you provide to your customers, it is likely that during and after the pandemic period you will be faced with more customers not being able to pay their bills, and this could have a significant impact on your businesses. Some retailers have asked what the Authority is doing to respond to this impact.

We are actively monitoring this situation, and seeking to assess the magnitude of adverse financial impacts on competition and reliability in our sector, including by:

- validating how widespread and urgent any cashflow or bad debt problem is for electricity retailers, or will become
- understanding the effect on electricity retailers of any Government relief initiatives to date, e.g., the Business Finance Guarantee Scheme.

We thank retailers for the data they have provided us and will continue to provide us in the weeks to come. We encourage retailers to continue to be proactive in giving us evidence that will help build an objective understanding of the business impacts of COVID-19 at an individual retailer level, and the measures retailers are adopting to promote financial resilience. This evidence will ensure we are well informed as we assess next steps for the electricity sector during this challenging period.

Yours sincerely



James Stevenson-Wallace

Chief Executive

Business	5/31/2022	Number of customer accounts where the latest invoice has not been paid by the due date	19546
Business	6/30/2022	Number of customer accounts where the latest invoice has not been paid by the due date	13965
Business	7/31/2022	Number of customer accounts where the latest invoice has not been paid by the due date	15305
Business	8/31/2022	Number of customer accounts where the latest invoice has not been paid by the due date	16297
Business	9/30/2022	Number of customer accounts where the latest invoice has not been paid by the due date	13578
Residential	1/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	26707117
Residential	2/28/2019	Total debt from customers that are in arrears by up to 30 days (\$)	26167060
Residential	3/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	22740481
Residential	4/30/2019	Total debt from customers that are in arrears by up to 30 days (\$)	26601761
Residential	5/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	28546884
Residential	6/30/2019	Total debt from customers that are in arrears by up to 30 days (\$)	24869106
Residential	7/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	35233265
Residential	8/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	36869561
Residential	9/30/2019	Total debt from customers that are in arrears by up to 30 days (\$)	42148987
Residential	10/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	40526312
Residential	11/30/2019	Total debt from customers that are in arrears by up to 30 days (\$)	34006483
Residential	12/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	35964306
Residential	1/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	26066889
Residential	2/29/2020	Total debt from customers that are in arrears by up to 30 days (\$)	26110780
Residential	3/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	29651634
Residential	4/30/2020	Total debt from customers that are in arrears by up to 30 days (\$)	24473129
Residential	5/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	27286409
Residential	6/30/2020	Total debt from customers that are in arrears by up to 30 days (\$)	30965167
Residential	7/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	34851044
Residential	8/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	39095451
Residential	9/30/2020	Total debt from customers that are in arrears by up to 30 days (\$)	42501585
Residential	10/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	35796878
Residential	11/30/2020	Total debt from customers that are in arrears by up to 30 days (\$)	34790689
Residential	12/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	33115474
Residential	1/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	25605266
Residential	2/28/2021	Total debt from customers that are in arrears by up to 30 days (\$)	25389855
Residential	3/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	26734525
Residential	4/30/2021	Total debt from customers that are in arrears by up to 30 days (\$)	21128167
Residential	5/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	26421158
Residential	6/30/2021	Total debt from customers that are in arrears by up to 30 days (\$)	29266202
Residential	7/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	33504946
Residential	8/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	45657411
Residential	9/30/2021	Total debt from customers that are in arrears by up to 30 days (\$)	40822759
Residential	10/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	36823385
Residential	11/30/2021	Total debt from customers that are in arrears by up to 30 days (\$)	37272820
Residential	12/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	29588840
Residential	1/31/2022	Total debt from customers that are in arrears by up to 30 days (\$)	25715279
Residential	2/28/2022	Total debt from customers that are in arrears by up to 30 days (\$)	24876628
Residential	3/31/2022	Total debt from customers that are in arrears by up to 30 days (\$)	25073926
Residential	4/30/2022	Total debt from customers that are in arrears by up to 30 days (\$)	21692020
Residential	5/31/2022	Total debt from customers that are in arrears by up to 30 days (\$)	19163080
Residential	6/30/2022	Total debt from customers that are in arrears by up to 30 days (\$)	20549660
Residential	7/31/2022	Total debt from customers that are in arrears by up to 30 days (\$)	26670231
Residential	8/31/2022	Total debt from customers that are in arrears by up to 30 days (\$)	31102675
Residential	9/30/2022	Total debt from customers that are in arrears by up to 30 days (\$)	23885720
Business	1/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	25479457
Business	2/28/2019	Total debt from customers that are in arrears by up to 30 days (\$)	27019949
Business	3/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	30604575
Business	4/30/2019	Total debt from customers that are in arrears by up to 30 days (\$)	38995367
Business	5/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	28098519
Business	6/30/2019	Total debt from customers that are in arrears by up to 30 days (\$)	34448696
Business	7/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	34347446
Business	8/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	32646057
Business	9/30/2019	Total debt from customers that are in arrears by up to 30 days (\$)	42604967
Business	10/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	35270591
Business	11/30/2019	Total debt from customers that are in arrears by up to 30 days (\$)	34889352
Business	12/31/2019	Total debt from customers that are in arrears by up to 30 days (\$)	68416208
Business	1/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	33459438
Business	2/29/2020	Total debt from customers that are in arrears by up to 30 days (\$)	32563525
Business	3/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	37738929
Business	4/30/2020	Total debt from customers that are in arrears by up to 30 days (\$)	38135452
Business	5/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	29316632
Business	6/30/2020	Total debt from customers that are in arrears by up to 30 days (\$)	28734973
Business	7/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	30505660
Business	8/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	33360860
Business	9/30/2020	Total debt from customers that are in arrears by up to 30 days (\$)	29100476
Business	10/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	29141543
Business	11/30/2020	Total debt from customers that are in arrears by up to 30 days (\$)	27865613
Business	12/31/2020	Total debt from customers that are in arrears by up to 30 days (\$)	28582664
Business	1/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	29981160
Business	2/28/2021	Total debt from customers that are in arrears by up to 30 days (\$)	52026515
Business	3/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	32526105
Business	4/30/2021	Total debt from customers that are in arrears by up to 30 days (\$)	33249842
Business	5/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	33620252
Business	6/30/2021	Total debt from customers that are in arrears by up to 30 days (\$)	38434954
Business	7/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	38345307
Business	8/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	43644035
Business	9/30/2021	Total debt from customers that are in arrears by up to 30 days (\$)	34851921
Business	10/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	25567788
Business	11/30/2021	Total debt from customers that are in arrears by up to 30 days (\$)	28884349
Business	12/31/2021	Total debt from customers that are in arrears by up to 30 days (\$)	33695706

Business	1/31/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	193170.1
Business	2/28/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	172518.6
Business	3/31/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	202866.3
Business	4/30/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	150481.8
Business	5/31/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	185124
Business	6/30/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	187729.9
Business	7/31/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	297235.9
Business	8/31/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	142102.2
Business	9/30/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	652528
Business	10/31/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	363768
Business	11/30/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	545257.7
Business	12/31/2021	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	332834.9
Business	1/31/2022	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	583258.8
Business	2/28/2022	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	388933.1
Business	3/31/2022	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	566110.4
Business	4/30/2022	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	52320.8
Business	5/31/2022	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	472288.1
Business	6/30/2022	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	511567.6
Business	7/31/2022	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	643424
Business	8/31/2022	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	345700.4
Business	9/30/2022	Total debt from customer accounts where ICP disconnection is scheduled and has not yet been actioned (\$)	682842.4
Residential	1/31/2019	Total debt from customers disconnected for non-payment (\$)	1389751
Residential	2/28/2019	Total debt from customers disconnected for non-payment (\$)	1528621
Residential	3/31/2019	Total debt from customers disconnected for non-payment (\$)	1545879
Residential	4/30/2019	Total debt from customers disconnected for non-payment (\$)	1291746
Residential	5/31/2019	Total debt from customers disconnected for non-payment (\$)	1463904
Residential	6/30/2019	Total debt from customers disconnected for non-payment (\$)	1410922
Residential	7/31/2019	Total debt from customers disconnected for non-payment (\$)	2029673
Residential	8/31/2019	Total debt from customers disconnected for non-payment (\$)	1990514
Residential	9/30/2019	Total debt from customers disconnected for non-payment (\$)	2418065
Residential	10/31/2019	Total debt from customers disconnected for non-payment (\$)	2201595
Residential	11/30/2019	Total debt from customers disconnected for non-payment (\$)	2047066
Residential	12/31/2019	Total debt from customers disconnected for non-payment (\$)	1590486
Residential	1/31/2020	Total debt from customers disconnected for non-payment (\$)	1847796
Residential	2/29/2020	Total debt from customers disconnected for non-payment (\$)	1798206
Residential	3/31/2020	Total debt from customers disconnected for non-payment (\$)	1587464
Residential	4/30/2020	Total debt from customers disconnected for non-payment (\$)	905385.2
Residential	5/31/2020	Total debt from customers disconnected for non-payment (\$)	1089645
Residential	6/30/2020	Total debt from customers disconnected for non-payment (\$)	1657707
Residential	7/31/2020	Total debt from customers disconnected for non-payment (\$)	1998954
Residential	8/31/2020	Total debt from customers disconnected for non-payment (\$)	2041190
Residential	9/30/2020	Total debt from customers disconnected for non-payment (\$)	2285747
Residential	10/31/2020	Total debt from customers disconnected for non-payment (\$)	2408625
Residential	11/30/2020	Total debt from customers disconnected for non-payment (\$)	2174159
Residential	12/31/2020	Total debt from customers disconnected for non-payment (\$)	1769307
Residential	1/31/2021	Total debt from customers disconnected for non-payment (\$)	1822110
Residential	2/28/2021	Total debt from customers disconnected for non-payment (\$)	1979771
Residential	3/31/2021	Total debt from customers disconnected for non-payment (\$)	1567052
Residential	4/30/2021	Total debt from customers disconnected for non-payment (\$)	1415931
Residential	5/31/2021	Total debt from customers disconnected for non-payment (\$)	1654956
Residential	6/30/2021	Total debt from customers disconnected for non-payment (\$)	1704546
Residential	7/31/2021	Total debt from customers disconnected for non-payment (\$)	1911063
Residential	8/31/2021	Total debt from customers disconnected for non-payment (\$)	1818908
Residential	9/30/2021	Total debt from customers disconnected for non-payment (\$)	1875914
Residential	10/31/2021	Total debt from customers disconnected for non-payment (\$)	2334180
Residential	11/30/2021	Total debt from customers disconnected for non-payment (\$)	1870943
Residential	12/31/2021	Total debt from customers disconnected for non-payment (\$)	1611962
Residential	1/31/2022	Total debt from customers disconnected for non-payment (\$)	2099619
Residential	2/28/2022	Total debt from customers disconnected for non-payment (\$)	2212701
Residential	3/31/2022	Total debt from customers disconnected for non-payment (\$)	2110909
Residential	4/30/2022	Total debt from customers disconnected for non-payment (\$)	1643998
Residential	5/31/2022	Total debt from customers disconnected for non-payment (\$)	1786878
Residential	6/30/2022	Total debt from customers disconnected for non-payment (\$)	6967141
Residential	7/31/2022	Total debt from customers disconnected for non-payment (\$)	6957565
Residential	8/31/2022	Total debt from customers disconnected for non-payment (\$)	9605528
Residential	9/30/2022	Total debt from customers disconnected for non-payment (\$)	2513306
Business	1/31/2019	Total debt from customers disconnected for non-payment (\$)	106459.3
Business	2/28/2019	Total debt from customers disconnected for non-payment (\$)	93812.17
Business	3/31/2019	Total debt from customers disconnected for non-payment (\$)	99800.49
Business	4/30/2019	Total debt from customers disconnected for non-payment (\$)	48752.86
Business	5/31/2019	Total debt from customers disconnected for non-payment (\$)	133946.4
Business	6/30/2019	Total debt from customers disconnected for non-payment (\$)	109801.8
Business	7/31/2019	Total debt from customers disconnected for non-payment (\$)	119578.9
Business	8/31/2019	Total debt from customers disconnected for non-payment (\$)	114788.6
Business	9/30/2019	Total debt from customers disconnected for non-payment (\$)	87537.61
Business	10/31/2019	Total debt from customers disconnected for non-payment (\$)	88212.71
Business	11/30/2019	Total debt from customers disconnected for non-payment (\$)	78195.21
Business	12/31/2019	Total debt from customers disconnected for non-payment (\$)	35456.87
Business	1/31/2020	Total debt from customers disconnected for non-payment (\$)	104604
Business	2/29/2020	Total debt from customers disconnected for non-payment (\$)	116721
Business	3/31/2020	Total debt from customers disconnected for non-payment (\$)	125831.6
Business	4/30/2020	Total debt from customers disconnected for non-payment (\$)	0
Business	5/31/2020	Total debt from customers disconnected for non-payment (\$)	28158.1
Business	6/30/2020	Total debt from customers disconnected for non-payment (\$)	100403.5
Business	7/31/2020	Total debt from customers disconnected for non-payment (\$)	53721.88
Business	8/31/2020	Total debt from customers disconnected for non-payment (\$)	37522.88

Business	9/30/2020	Total debt from customers disconnected for non-payment (\$)	62915.5
Business	10/31/2020	Total debt from customers disconnected for non-payment (\$)	51869.68
Business	11/30/2020	Total debt from customers disconnected for non-payment (\$)	68505.26
Business	12/31/2020	Total debt from customers disconnected for non-payment (\$)	43190.55
Business	1/31/2021	Total debt from customers disconnected for non-payment (\$)	50434.49
Business	2/28/2021	Total debt from customers disconnected for non-payment (\$)	35310.71
Business	3/31/2021	Total debt from customers disconnected for non-payment (\$)	396953.6
Business	4/30/2021	Total debt from customers disconnected for non-payment (\$)	17228.94
Business	5/31/2021	Total debt from customers disconnected for non-payment (\$)	76722.47
Business	6/30/2021	Total debt from customers disconnected for non-payment (\$)	35652.71
Business	7/31/2021	Total debt from customers disconnected for non-payment (\$)	27684.22
Business	8/31/2021	Total debt from customers disconnected for non-payment (\$)	28362.39
Business	9/30/2021	Total debt from customers disconnected for non-payment (\$)	12114.95
Business	10/31/2021	Total debt from customers disconnected for non-payment (\$)	22605.69
Business	11/30/2021	Total debt from customers disconnected for non-payment (\$)	12026.9
Business	12/31/2021	Total debt from customers disconnected for non-payment (\$)	26260.5
Business	1/31/2022	Total debt from customers disconnected for non-payment (\$)	60734.13
Business	2/28/2022	Total debt from customers disconnected for non-payment (\$)	66213.97
Business	3/31/2022	Total debt from customers disconnected for non-payment (\$)	94022.28
Business	4/30/2022	Total debt from customers disconnected for non-payment (\$)	30867.74
Business	5/31/2022	Total debt from customers disconnected for non-payment (\$)	64738.79
Business	6/30/2022	Total debt from customers disconnected for non-payment (\$)	53874.15
Business	7/31/2022	Total debt from customers disconnected for non-payment (\$)	41493.64
Business	8/31/2022	Total debt from customers disconnected for non-payment (\$)	56777.5
Business	9/30/2022	Total debt from customers disconnected for non-payment (\$)	119221.9
Residential	1/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	49957243
Residential	2/28/2019	Total overdue debt from customer non-payment in this market segment (\$)	44930630
Residential	3/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	37040103
Residential	4/30/2019	Total overdue debt from customer non-payment in this market segment (\$)	39953905
Residential	5/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	36672717
Residential	6/30/2019	Total overdue debt from customer non-payment in this market segment (\$)	38771748
Residential	7/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	49375251
Residential	8/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	52971777
Residential	9/30/2019	Total overdue debt from customer non-payment in this market segment (\$)	58365375
Residential	10/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	62239254
Residential	11/30/2019	Total overdue debt from customer non-payment in this market segment (\$)	57110843
Residential	12/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	61330348
Residential	1/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	53183323
Residential	2/29/2020	Total overdue debt from customer non-payment in this market segment (\$)	50956480
Residential	3/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	46626022
Residential	4/30/2020	Total overdue debt from customer non-payment in this market segment (\$)	45045212
Residential	5/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	48330538
Residential	6/30/2020	Total overdue debt from customer non-payment in this market segment (\$)	52316968
Residential	7/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	55697424
Residential	8/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	60495580
Residential	9/30/2020	Total overdue debt from customer non-payment in this market segment (\$)	67171528
Residential	10/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	65218472
Residential	11/30/2020	Total overdue debt from customer non-payment in this market segment (\$)	64605673
Residential	12/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	83554028
Residential	1/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	58659062
Residential	2/28/2021	Total overdue debt from customer non-payment in this market segment (\$)	56077279
Residential	3/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	57194525
Residential	4/30/2021	Total overdue debt from customer non-payment in this market segment (\$)	41335207
Residential	5/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	45831244
Residential	6/30/2021	Total overdue debt from customer non-payment in this market segment (\$)	49141443
Residential	7/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	54474249
Residential	8/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	67665755
Residential	9/30/2021	Total overdue debt from customer non-payment in this market segment (\$)	69940829
Residential	10/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	69765155
Residential	11/30/2021	Total overdue debt from customer non-payment in this market segment (\$)	72175503
Residential	12/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	64370787
Residential	1/31/2022	Total overdue debt from customer non-payment in this market segment (\$)	60740236
Residential	2/28/2022	Total overdue debt from customer non-payment in this market segment (\$)	53413809
Residential	3/31/2022	Total overdue debt from customer non-payment in this market segment (\$)	45526959
Residential	4/30/2022	Total overdue debt from customer non-payment in this market segment (\$)	42356753
Residential	5/31/2022	Total overdue debt from customer non-payment in this market segment (\$)	29926776
Residential	6/30/2022	Total overdue debt from customer non-payment in this market segment (\$)	31531436
Residential	7/31/2022	Total overdue debt from customer non-payment in this market segment (\$)	38249663
Residential	8/31/2022	Total overdue debt from customer non-payment in this market segment (\$)	44363121
Residential	9/30/2022	Total overdue debt from customer non-payment in this market segment (\$)	33910845
Business	1/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	29228842
Business	2/28/2019	Total overdue debt from customer non-payment in this market segment (\$)	31768557
Business	3/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	41185163
Business	4/30/2019	Total overdue debt from customer non-payment in this market segment (\$)	50839325
Business	5/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	42998171
Business	6/30/2019	Total overdue debt from customer non-payment in this market segment (\$)	38565510
Business	7/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	35976620
Business	8/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	32708151
Business	9/30/2019	Total overdue debt from customer non-payment in this market segment (\$)	45464618
Business	10/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	35160948
Business	11/30/2019	Total overdue debt from customer non-payment in this market segment (\$)	35686022
Business	12/31/2019	Total overdue debt from customer non-payment in this market segment (\$)	44588196
Business	1/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	40473559
Business	2/29/2020	Total overdue debt from customer non-payment in this market segment (\$)	36565484
Business	3/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	30150268
Business	4/30/2020	Total overdue debt from customer non-payment in this market segment (\$)	33137790

Business	5/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	30266851
Business	6/30/2020	Total overdue debt from customer non-payment in this market segment (\$)	29631942
Business	7/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	29219910
Business	8/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	30027171
Business	9/30/2020	Total overdue debt from customer non-payment in this market segment (\$)	25251750
Business	10/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	26954507
Business	11/30/2020	Total overdue debt from customer non-payment in this market segment (\$)	26357868
Business	12/31/2020	Total overdue debt from customer non-payment in this market segment (\$)	50109105
Business	1/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	45287755
Business	2/28/2021	Total overdue debt from customer non-payment in this market segment (\$)	36630782
Business	3/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	37299861
Business	4/30/2021	Total overdue debt from customer non-payment in this market segment (\$)	40117433
Business	5/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	56620367
Business	6/30/2021	Total overdue debt from customer non-payment in this market segment (\$)	53940332
Business	7/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	63778295
Business	8/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	52939537
Business	9/30/2021	Total overdue debt from customer non-payment in this market segment (\$)	61623936
Business	10/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	41320522
Business	11/30/2021	Total overdue debt from customer non-payment in this market segment (\$)	51809266
Business	12/31/2021	Total overdue debt from customer non-payment in this market segment (\$)	46493137
Business	1/31/2022	Total overdue debt from customer non-payment in this market segment (\$)	35878369
Business	2/28/2022	Total overdue debt from customer non-payment in this market segment (\$)	41391091
Business	3/31/2022	Total overdue debt from customer non-payment in this market segment (\$)	39444714
Business	4/30/2022	Total overdue debt from customer non-payment in this market segment (\$)	52203394
Business	5/31/2022	Total overdue debt from customer non-payment in this market segment (\$)	43516606
Business	6/30/2022	Total overdue debt from customer non-payment in this market segment (\$)	37844743
Business	7/31/2022	Total overdue debt from customer non-payment in this market segment (\$)	42627938
Business	8/31/2022	Total overdue debt from customer non-payment in this market segment (\$)	43377703
Business	9/30/2022	Total overdue debt from customer non-payment in this market segment (\$)	45279385
Residential	1/31/2019	Total customer debt written off during the period	1365442
Residential	2/28/2019	Total customer debt written off during the period	1334477
Residential	3/31/2019	Total customer debt written off during the period	7254121
Residential	4/30/2019	Total customer debt written off during the period	1846605
Residential	5/31/2019	Total customer debt written off during the period	1317900
Residential	6/30/2019	Total customer debt written off during the period	1328340
Residential	7/31/2019	Total customer debt written off during the period	1149947
Residential	8/31/2019	Total customer debt written off during the period	1060836
Residential	9/30/2019	Total customer debt written off during the period	1399070
Residential	10/31/2019	Total customer debt written off during the period	1245162
Residential	11/30/2019	Total customer debt written off during the period	1161934
Residential	12/31/2019	Total customer debt written off during the period	1376589
Residential	1/31/2020	Total customer debt written off during the period	1049473
Residential	2/29/2020	Total customer debt written off during the period	1391318
Residential	3/31/2020	Total customer debt written off during the period	13084624
Residential	4/30/2020	Total customer debt written off during the period	1110900
Residential	5/31/2020	Total customer debt written off during the period	1205102
Residential	6/30/2020	Total customer debt written off during the period	897399.7
Residential	7/31/2020	Total customer debt written off during the period	1021905
Residential	8/31/2020	Total customer debt written off during the period	664646.3
Residential	9/30/2020	Total customer debt written off during the period	718935
Residential	10/31/2020	Total customer debt written off during the period	706246.3
Residential	11/30/2020	Total customer debt written off during the period	1712866
Residential	12/31/2020	Total customer debt written off during the period	1117357
Residential	1/31/2021	Total customer debt written off during the period	1190292
Residential	2/28/2021	Total customer debt written off during the period	1100131
Residential	3/31/2021	Total customer debt written off during the period	12882805
Residential	4/30/2021	Total customer debt written off during the period	976628.1
Residential	5/31/2021	Total customer debt written off during the period	789049.8
Residential	6/30/2021	Total customer debt written off during the period	829850.6
Residential	7/31/2021	Total customer debt written off during the period	870579.2
Residential	8/31/2021	Total customer debt written off during the period	776692.7
Residential	9/30/2021	Total customer debt written off during the period	678538.4
Residential	10/31/2021	Total customer debt written off during the period	642241.2
Residential	11/30/2021	Total customer debt written off during the period	697080.9
Residential	12/31/2021	Total customer debt written off during the period	687112
Residential	1/31/2022	Total customer debt written off during the period	518368.1
Residential	2/28/2022	Total customer debt written off during the period	688318.5
Residential	3/31/2022	Total customer debt written off during the period	10702852
Residential	4/30/2022	Total customer debt written off during the period	636318.7
Residential	5/31/2022	Total customer debt written off during the period	629068
Residential	6/30/2022	Total customer debt written off during the period	708433
Residential	7/31/2022	Total customer debt written off during the period	1076092
Residential	8/31/2022	Total customer debt written off during the period	699702.4
Residential	9/30/2022	Total customer debt written off during the period	900190.6
Business	1/31/2019	Total customer debt written off during the period	110994.9
Business	2/28/2019	Total customer debt written off during the period	175207.1
Business	3/31/2019	Total customer debt written off during the period	132460.4
Business	4/30/2019	Total customer debt written off during the period	245752.9
Business	5/31/2019	Total customer debt written off during the period	121262.8
Business	6/30/2019	Total customer debt written off during the period	203216.8
Business	7/31/2019	Total customer debt written off during the period	334621.1
Business	8/31/2019	Total customer debt written off during the period	245003.4
Business	9/30/2019	Total customer debt written off during the period	157923.3
Business	10/31/2019	Total customer debt written off during the period	164520.2
Business	11/30/2019	Total customer debt written off during the period	117239.7
Business	12/31/2019	Total customer debt written off during the period	296189.2

Business	1/31/2020	Total customer debt written off during the period	173231.1
Business	2/29/2020	Total customer debt written off during the period	153621.7
Business	3/31/2020	Total customer debt written off during the period	3491703
Business	4/30/2020	Total customer debt written off during the period	107659.7
Business	5/31/2020	Total customer debt written off during the period	211483.9
Business	6/30/2020	Total customer debt written off during the period	248538.2
Business	7/31/2020	Total customer debt written off during the period	114825.9
Business	8/31/2020	Total customer debt written off during the period	172826.7
Business	9/30/2020	Total customer debt written off during the period	158280.2
Business	10/31/2020	Total customer debt written off during the period	352954.3
Business	11/30/2020	Total customer debt written off during the period	229354.8
Business	12/31/2020	Total customer debt written off during the period	139314.3
Business	1/31/2021	Total customer debt written off during the period	92135.17
Business	2/28/2021	Total customer debt written off during the period	180570.6
Business	3/31/2021	Total customer debt written off during the period	582094.5
Business	4/30/2021	Total customer debt written off during the period	150068.2
Business	5/31/2021	Total customer debt written off during the period	150738.2
Business	6/30/2021	Total customer debt written off during the period	159268.5
Business	7/31/2021	Total customer debt written off during the period	203530.9
Business	8/31/2021	Total customer debt written off during the period	139852.5
Business	9/30/2021	Total customer debt written off during the period	84354.17
Business	10/31/2021	Total customer debt written off during the period	103135.3
Business	11/30/2021	Total customer debt written off during the period	79696
Business	12/31/2021	Total customer debt written off during the period	281485.2
Business	1/31/2022	Total customer debt written off during the period	58117.73
Business	2/28/2022	Total customer debt written off during the period	128068.6
Business	3/31/2022	Total customer debt written off during the period	1263928
Business	4/30/2022	Total customer debt written off during the period	92170.16
Business	5/31/2022	Total customer debt written off during the period	112386.3
Business	6/30/2022	Total customer debt written off during the period	122541.1
Business	7/31/2022	Total customer debt written off during the period	259913.6
Business	8/31/2022	Total customer debt written off during the period	146329.9
Business	9/30/2022	Total customer debt written off during the period	97466.08

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