

## Appendix C Format for submissions

Submitter	
<i>All questions are optional. Please answer as many or as few as you wish. Thank you.</i>	
Questions	Comments
<b>Proposal A – Standardise billing information</b>	
Q1. Should minimum billing standards be compulsory or voluntary??	<p>Compulsory.</p> <p>With consumers facing major cost pressures and thousands of households in energy hardship, the Authority must use every lever it can to lower prices.</p> <p>Introducing compulsory billing standards is one obvious way to intervene. The current switching rate (6% of households in the past year) is extremely poor. This harms consumers because many continue to pay higher prices than they need to and retailers are less incentivised to compete by lowering prices.</p> <p>One factor preventing switching - confusing bills - was identified in the 2019 Electricity Price Review. During the six years since, advocates have repeatedly called for compulsory billing standards. Given the long-standing calls, it is time for the Authority to act.</p> <p>Voluntary guidelines are not enough. We know from the experience of the Consumer Care Guidelines that voluntary guidelines did NOT achieve compliance across the board. Neither consumers, nor consumer advocates have the information or resources necessary to challenge non-compliances in a voluntary regime.</p> <p>It is necessary and timely for the Authority to introduce compulsory billing standards.</p>
Q2. Would the Authority providing a model bill and guidelines reduce your implementation costs and the time needed to implement these changes?	NA
Q3. Tiered layout – Do you support adopting a two-tiered	Yes

<p>approach to information on bills? If not, how should critical and important information be distinguished?</p>	
<p>Q4. Content requirements – Do you have any additions or removals to the proposed tier one and tier two content lists?</p>	<ul style="list-style-type: none"> <li>• “The (proposed) product identifier code” - we suggest requiring this to be named “Plan identifier code” or something else with the word ‘Plan’ in it.</li> <li>• In “Breakdown of amount due calculation”, add a requirement to include the lines charge component of the bill.</li> <li>• To avoid any risk that the Better Plan messages dissuade people from using the energy price comparison website, we suggest <u>requiring</u> wording to make clear that better plan messaging refers to <i>this</i> retailer, and the other refers to <i>all</i> retailers. Note that the illustrative examples you provide in 3.41 and 3.42 (p. 23) do NOT adequately make this distinction. Instead we suggest you require wording such as: <ul style="list-style-type: none"> <li>○ <b>(When introducing better plan message):</b> “<i>You are on the cheapest plan with [insert company name]. We will check your plan again on DATE.</i>”</li> <li>○ OR “<i>You are not currently on the cheapest plan that [insert company name] offers. Based on your usage, you may be better off on XXXX plan. To switch plans, contact [insert contact details]. We will check your plan again on DATE.</i>”</li> <li>○ <b>(When introducing price comparison website):</b> “<i>Other companies may offer a better deal. Visit XXX website to find the best price across all electricity retailers.</i>”</li> </ul> </li> <li>• Perhaps consider - if the customer does NOT have a communicating smart meter, require companies to inform them, with something like: “<i>Our records show that your household does not have a communicating smart meter, which may prevent you accessing cheaper plans. To enquire about installing a smart meter, visit XXXX.</i>”</li> </ul>
<p>Q5. Implementation – For retailers, how much time would be needed for your organisation to incorporate this content across all billing channels? What challenges or dependencies (e.g. data collection, data standards, IT</p>	<p>Given the cost of living pressures facing consumers, and the thousands in energy hardship, please implement these changes as soon as possible. This should certainly be no later than 1 April so people can find the cheapest plans for winter 2026.</p>

systems or staff training) need to be factored into timing?	
Q6. Future-proofing – What mechanisms would best ensure these standards to evolve with new technologies, plans and AI-enabled billing in future?	Reassess every five years or as required.
<b>Proposal B – Introduce better plan</b>	
Q7. Do you agree with the proposed better plan review mechanism?	<p>Yes we commend this proposal.</p> <p>Our research in 2025 showed that very few companies proactively checked customers' plans and informed them of cheaper options, unless customers directly asked. This has the potential to leave thousands of customers paying far more than they should for months or even years.</p> <p>Flick was an exception, proactively checking plans every 90 days.</p> <p>When we informed the public that so few companies checked their plans, many people were shocked as they mistakenly believed their company was required to inform them of better options. Most people did not know they needed to directly ask. We are concerned that many people do not have the time or inclination to regularly contact their power company to check they are on the correct plan. Nor should they have to - the onus should be on companies.</p> <p>It is entirely reasonable to require companies to regularly check customers' plans. They are providing a service and have access to information about available plans and customers' usage data. The example of Flick shows that regular checks are feasible. Further, companies must already inform customers who directly ask, so must already have the ability to make the assessment.</p> <p>Bundling should not be a barrier to assessing best plans. Companies are already required to separate electricity components of bundles for bills. Companies should inform customers of plans that would be cheaper for them if they took on (or stopped taking) a bundled service, and/or inform them of other cheaper bundles that they offer.</p> <p>There are two additions you could consider to further support consumers to find the best plan:</p> <ol style="list-style-type: none"> <li>1) requiring retailers to check that customers are on the cheapest lines capacity threshold for their use, and if not, how to go about right-sizing. This may make a material difference in some cases.</li> </ol>

	<p>2) requiring retailers to inform customers if any other aspects of their meter configuration or type is preventing them from accessing cheaper plans. For instance, if they could access cheaper plans by installing a smart meter, how to go about this.</p> <p>The same principles apply in these situations as for informing consumers of a better plan. The retailer has access to information that might materially impact a person's bill, but most consumers would not know to ask about it. Given this information imbalance the onus should be on retailers to inform consumers.</p>
<p>Q8. Is six months the right frequency for a better plan review?</p>	<p>Yes. Any longer would leave consumers on the wrong plans for too long, for instance if a new plan became available the month after their last check.</p> <p>Flick previously did proactive checks of customers plans every 90 days and informed them if they would be better off on a different plan.</p> <p>Once retailers have set up (most likely automated) their method of calculating and communicating the results, it should not be arduous to do these twice per year.</p> <p>The cost to retailers is justified to prevent consumers paying hundreds of dollars from being left on the wrong plan.</p>
<p>Q9. Is three months an appropriate time frame for time-of-use trials? If not, what period would you suggest?</p>	<p>Yes.</p> <p>Then, if the customer chose to stay longer, at the 6-month point the retailer would do the (proposed) Better Plan check and the customer could switch without an internal break fee. That would provide another moment to check that they were on the correct plan, risk free.</p>
<p>Q10. Do you have any feedback on the risk-free time of use proposal, requirement to inform customers whether they are saving on a time-of-use plan and type of guidance given on how to shift consumption?</p>	<p>Looks good.</p>
<p>Q11. Do you support prohibiting termination fees when switching between plans with the same retailer?</p>	<p>Yes definitely.</p> <p>For the same reasons, please prohibit ALL break fees and sign-up "freebies", as these present significant barriers to switching and can lock people into hardship.</p> <p>We disagree with your proposal to exclude these changes at this time.</p>

	<p>At a minimum, companies should be required to waive break fees for customers in hardship, as these fees can lock people into plans that are unaffordable. So-called “freebies” on signup, which are effectively loans, are NOT subject to the same scrutiny and assurance that people have the means to repay as do comparable small loans regimes. “Freebies” can lead to hardship by locking people into unaffordable plans. These fees and freebies hinder switching and are therefore contrary to the goal of promoting customer mobility. It makes sense to prohibit these at the same time as internal break fees, because companies are already changing terms and conditions and would then only need to do so once, saving transition costs.</p>
<p>Q12. For retailers, what costs do you anticipate in implementing this change and what implementation support would reduce such costs?</p>	
<p>Q13. Do you agree with our proposed transitional arrangements? If not, how would you change them?</p>	<p>To ensure benefits for consumers as soon as possible, consider whether this transitional period is really necessary. If Code change is signalled several months in advance, companies could use that time to review terms and conditions and inform customers of changes.</p>
<p><b>Proposal C – Encourage consumers to compare plans across all retailers and switch where it will save them money</b></p>	
<p>Q14. Do you agree with the proposed wording of the prompt?</p>	<p>No. See answer to Q4.</p> <p>To reduce the risk of confusion with the Better Plan message, require that this prompt clearly indicates comparison with different retailers. For example:</p> <p><i>“Could you save money with a different company? Compare plans at the independent and government-funded site [TBC].org.nz. The Electricity Authority requires us to include this information”</i></p> <p>Please also require wording to introduce the Better Plan message, so it is clear that that refers to best plan <i>with that retailer</i>. For example:</p> <ul style="list-style-type: none"> <li>• <b>(When introducing better plan message):</b> <i>“You are on the cheapest plan with [insert]</i></li> </ul>

	<p><i>company name]. We will check your plan again on DATE.”</i></p> <ul style="list-style-type: none"> <li>• OR “You are not currently on the cheapest plan that [insert company name] offers. Based on your usage, you may be better off on XXXX plan. To switch plans, contact [insert contact details]. We will check your plan again on DATE.”</li> </ul>
Q15. For retailers, what lead-in period would you need to implement this prompt across all channels?	
Q16. Do you agree that each retailer should be required to maintain a catalogue to allow customers to compare their full range of plans and costs?	Yes
Q17. For retailers, do you already have a catalogue in which you show your current and any prospective customers your generally available plans and tariffs? If not, why not?	
Q18. Do you agree that the annual check-in should also include telling customers about the retailer's channels for comparing and accessing better plans?	Yes
Q19. Do you agree that retailers should offer information about better plans whenever a customer contacts them about their bill or plan, not only when the customer explicitly asks to change plans?	Yes. If the company has assessed that there is a better plan available, they should remind the customer in each interaction.
<b>Proposal D – Limit back-billing to protect residential and small business consumers from bill shock</b>	
Q20. Do you agree with this proposal to limit back-billing with justifiable exceptions?	Yes
Q21. Is a six-month cap reasonable?	Four months would deliver better outcomes for consumers.
Q22. Do you agree that customer should be allowed to pay back bills in instalments matching the	Yes

period of the back bills? If not, what alternative do you propose?	
Q23. What additional proactive measures (beyond those listed) would best prevent back bills from accruing?	Perhaps - require companies to proactively offer support on how to install smart-meters in cases where customers do not have these.
Q24. For retailers, taking into account any operational requirements, is the proposed transition period sufficient to implement these obligations?	
<b>Next steps and proposed implementation</b>	
Q25. Are these the right outcome measures to track success?	Looks good
Q26. Do you agree with these implementation principles?	
Q27. How could we best support smaller retailers during the transition?	
Q28. Are there other interdependencies we should factor into the timetable?	
Q29. Do you agree with our preferred timing?	Definitely option 1.  The other options delay benefits for consumers.
Q30. If you prefer option 3, which elements should be delayed to 2027?	
Q31. How much lead time do you need to implement these proposals, should they proceed?	
<b>Regulatory statement for the proposed amendment</b>	
Q32. Do you agree with the objectives of the proposed amendment?	Looks good
Q33. Do you agree that the benefits of the proposed Code amendment outweigh its costs?	Yes
Q34. Do you have any feedback on these criteria for weighing options?	
Q35. Do you agree with our assessment of the four options presented?	

<p>Q36. Do you agree with our proposal to introduce mandatory billing improvements, rather than voluntary guidelines?</p>	<p>Yes. Compulsory standards are long overdue.</p> <p>With consumers facing major cost pressures and thousands of households in energy hardship, the Authority must use every lever it can to lower prices.</p> <p>Billing standards are one obvious way to intervene. The current switching rate (6% of households in the past year) is extremely poor. This harms consumers because many continue to pay higher prices than they need to and retailers are less incentivised to compete by lowering prices.</p> <p>One factor preventing switching, confusing bills making comparison difficult, was identified in the 2019 Electricity Price Review. Over the six years since, advocates have repeatedly called for compulsory billing standards. Given the long-standing calls, it is time for the Authority to act.</p> <p>Voluntary guidelines are not enough. We know from the experience of the Consumer Care Guidelines that voluntary guidelines did NOT achieve compliance across the board. Neither consumers, nor consumer advocates have the information or resources necessary to challenge non-compliances in a voluntary regime.</p> <p>It is necessary and timely for the Authority to introduce compulsory billing standards.</p>
<p>Q37. Which elements of standardisation (if any) could remain voluntary without undermining consumer outcomes?</p>	
<p>Q38. Do you agree with our proposed approach regarding small businesses?</p>	
<p>Q39. Do you agree with our assessment on alternatives to proposal B?</p>	<p>Please ban all break fees and “freebies” as these prevent barriers to switching and can lock people into hardship.</p> <p>At a minimum, companies should be required to waive break fees for customers in hardship, as these fees can lock people into plans that are unaffordable.</p> <p>So-called “freebies” on signup, which are effectively loans, are NOT subject to the same scrutiny and assurance that people have the means to repay as do</p>

	<p>comparable small loans regimes. “Freebies” can lead to hardship by locking people into unaffordable plans.</p> <p>These fees and freebies hinder switching and are therefore contrary to the goal of promoting customer mobility.</p> <p>It makes sense to prohibit these at the same time as internal break fees, because companies are already changing terms and conditions and would then only need to do so once.</p>
Q40. Do you agree with our assessment on alternatives to proposal C?	Yes
Q41. Do you agree with our assessment on alternatives to proposal D?	Prefer 4 month cap on back billing
Q42. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority’s statutory objectives in section 15 of the Electricity Industry Act 2010.	Yes
Q43. Do you agree the proposals are overall better than the alternative considered? If you disagree, please explain your preferred option in terms consistent with the Authority’s statutory objectives in section 15 of the Electricity Industry Act 2010.	Yes
<b>Proposed Code amendment</b>	
Q44. Do you have any comments on the drafting of the proposed amendment?	
Q45. Do you have any comments on the transitional provisions?	
Q46. Do you have any other feedback on this consultation paper or proposed Code amendment?	