

## Appendix C Format for submissions

<b>Submitter</b>	New Zealand Council of Christian Social Services (NZCCSS)
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*All questions are optional. Please answer as many or as few as you wish. Thank you.*

Questions	Comments
<b>Proposal A – Standardise billing information</b>	
Q1. Should minimum billing standards be compulsory or voluntary??	Compulsory
Q2. Would the Authority providing a model bill and guidelines reduce your implementation costs and the time needed to implement these changes?	N/A
Q3. Tiered layout – Do you support adopting a two-tiered approach to information on bills? If not, how should critical and important information be distinguished?	Yes
Q4. Content requirements – Do you have any additions or removals to the proposed tier one and tier two content lists?	
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 systems or staff training) need to be factored into timing?	We support the implementation of these changes as soon as possible.
Q6. Future-proofing – What mechanisms would best ensure these standards to evolve with	

new technologies, plans and AI-enabled billing in future?	
<b>Proposal B – Introduce better plan</b>	
Q7. Do you agree with the proposed better plan review mechanism?	<p>Yes, we strongly support this proposal.</p> <p>We believe this has the potential to provide substantial benefit to low-income households and particularly older people who are less engaged with the internet. However as noted in the consultation paper, usage can change dramatically in relation to a household's current situation (household composition, whether people are working from home etc) and we highlight a need to ensure it is clear to the consumer which period has been used to make the assessment. We suggest that this includes comment on any substantial changes in their power consumption compared to the previous year; for example if their power consumption has stayed the same for the first 8 months of the last year but halved for the final 4 months the proposed power plans may not be suitable, so making this clear will ensure that consumers do not sign up to an inappropriate plan. In addition, when providing consumers with multiple plan options it is essential that this is provided clearly with consideration of how the plans would apply to them and why they might be beneficial in this instance to ensure that vulnerable consumers are not disadvantaged.</p>
Q8. Is six months the right frequency for a better plan review?	Yes.
Q9. Is three months an appropriate time frame for time-of-use trials? If not, what period would you suggest?	Yes.
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?	

Q11. Do you support prohibiting termination fees when switching between plans with the same retailer?	Yes.
Q12. For retailers, what costs do you anticipate in implementing this change and what implementation support would reduce such costs?	N/A
Q13. Do you agree with our proposed transitional arrangements? If not, how would you change them?	
<b>Proposal C – Encourage consumers to compare plans across all retailers and switch where it will save them money</b>	
Q14. Do you agree with the proposed wording of the prompt?	It is essential that this is presented plainly to ensure there is no confusion among consumers and encourage checking of alternative providers. Wording which specifies that the consumer may be better off changing to another provider such as “you could save money by changing your plan or provider”
Q15. For retailers, what lead-in period would you need to implement this prompt across all channels?	N/A
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?	N/A
Q18. Do you agree that the annual check-in should also	Yes

include telling customers about the retailer's channels for comparing and accessing better plans?	
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
<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?	The consultation document mentions that an alternative proposal was to have the cut-off period for back-billing set to 4 months like has been done in Victoria Australia. This idea was not pursued as there were concerns raised (both for retailers and consumers) including that short cut-offs could result in consumers being more quickly disconnected. We were unable to find any evidence to suggest this has occurred in Victoria despite this legislation being introduced in 2021. Although we accept the introduction of a 6-month cut-off is a vast improvement on the status quo we would urge the Authority to consider shortening this further if the proposed benefit to low-income families is modelled to be significantly greater.
Q22. Do you agree that customer should be allowed to pay back bills in instalments matching the period of the back bills? If not, what alternative do you propose?	Yes
Q23. What additional proactive measures (beyond those listed) would best prevent back bills from accruing?	Ensuring all households have smart meters. This would also allow greater understanding of energy usage for these consumers.

Q24. For retailers, taking into account any operational requirements, is the proposed transition period sufficient to implement these obligations?	N/A
<b>Next steps and proposed implementation</b>	
Q25. Are these the right outcome measures to track success?	
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?	Option 1 is best.
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?	
Q33. Do you agree that the benefits of the proposed Code amendment outweigh its costs?	
Q34. Do you have any feedback on these criteria for weighing options?	

Q35. Do you agree with our assessment of the four options presented?	
Q36. Do you agree with our proposal to introduce mandatory billing improvements, rather than voluntary guidelines?	Yes
Q37. Which elements of standardisation (if any) could remain voluntary without undermining consumer outcomes?	
Q38. Do you agree with our proposed approach regarding small businesses?	
Q39. Do you agree with our assessment on alternatives to proposal B?	We encourage consideration of the removal of penalties for switching retailers. The consultation document highlights the main argument against doing so being disruption of contract-based incentives (Electrical Authority, 2025). However, as removing internal plan-switching penalties may give consumers the ability to switch to another plan to avoid penalty and then subsequently change to another retailer, it is likely that this will already disrupt contract-based incentives. As such we think this should be expanded to cover penalties for switching retailer as it would be in the best interest of consumers to do so.
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?	We would prefer back billing is capped to 4 months
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?	<p>NZCCSS strongly supports the use of plain language including the proposed change to remove jargon. We would however propose that where this is not achievable, specific electricity terms and abbreviations are explained as a footnote on the bill to ensure that consumers are able to easily identify the information, for example if an outside organisation is requesting details like Installation Control Point (ICP) number.</p> <p>Additionally, we're aware that although the average billing period is 30 days, some retailers billing periods vary drastically from month to month, with Genesis noting billing periods of up to 45 days. This makes it challenging for consumers to compare power bills from month to month or to assess how changing to a new plan has impacted their power bill. We would suggest considering a set billing period such as 4 weeks for all bills, with yearly comparisons using the same 4-week period. However, we understand that for consumers without smart meters this may be hard to implement so suggest the inclusion of a basic comparator like average daily electricity cost in each bill to help provide clarity for consumers.</p> <p>Currently bills, retailers and power comparison websites are inconsistent in their presentation of pricing in terms of GST inclusion or exclusion making it difficult for consumers to compare prices. The Commerce Commission recently highlighted concerns regarding some retailers advertising GST exclusive</p>

	<p>power pricing resulting in consumers signing up to power plans that were not producing cost savings. How power pricing is advertised and presented in bills should be consistent to allow for greater understanding and comparison of costs and ensure that consumers are not taken advantage of.</p> <p>Currently comparison of usage/cost with previous years is not a requirement to be presented in bills and many retailers require consumers to assess this themselves through manual comparison of previous bills or via the retailers app. This is a barrier for some cohorts including older people and those who live rurally who may not be using the app or have access to the internet. Consideration of these cohorts and how this information will be presented to them is needed to ensure that vulnerable households are not disadvantaged.</p>
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