

Appendix C Format for submissions

Submitter	W. Devine
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All questions are optional. Please answer as many or as few as you wish. Thank you.

Questions	Comments
Proposal A – Standardise billing information	
Q1. Should minimum billing standards be compulsory or voluntary??	Yes, compulsory
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 approach to information on bills? If not, how should critical and important information be distinguished?	No. one month to implement
Q4. Content requirements – Do you have any additions or removals to the proposed tier one and tier two content lists?	All prices quoted to consumers must be GST Inclusive. Final credit or debit amount to consumers to be GST Inclusive with the GST component displayed adjacent to total amount of CR or Debit.
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?	na
Q6. Future-proofing – What mechanisms would best ensure these standards to evolve with	Always open for review bi- annually or as required.

new technologies, plans and AI-enabled billing in future?	
Proposal B – Introduce better plan	
Q7. Do you agree with the proposed better plan review mechanism?	
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?	
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?	TOU plans need to have real time in house display of all smart meter data for consumer to make considered decisions.
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?	
Q13. Do you agree with our proposed transitional arrangements? If not, how would you change them?	
Proposal C – Encourage consumers to compare plans across all retailers and switch where it will save them money	

Q14. Do you agree with the proposed wording of the prompt?	Yes
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 as long as it compares apples with apples! All pricing GST Inclusive
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 there is no change fee incurred.
Proposal D – Limit back-billing to protect residential and small business consumers from bill shock	Absolutely. The meters don't belong to the consumers. Most are all owned by the retailers. If retailers can't keep track of changes in consumption that is their problem. Terms & Conditions need to be updated as they are currently slanted against consumers.
Q20. Do you agree with this proposal to limit back-billing with justifiable exceptions?	Yes, only for cases where consumers have somehow tampered with meters. Consumers must be given access to real time energy consumption from the installed smart meters. This is most important for consumers to be able to see the energy currently being used. Lines companies must also have access

	to this real time data for fault finding on their network. The current widespread power outages after the 23/10/25 extreme winds in Southland give good cause for real time data.
Q21. Is a six-month cap reasonable?	No. 3 months. Most meters are not owned by the consumers. Retailers are responsible for proper functioning of metering.
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, up to 3 months as above Q21
Q23. What additional proactive measures (beyond those listed) would best prevent back bills from accruing?	Retailers or the meter owners must be held accountable for faulty metering. Unless there is deliberate fraud on the part of the consumer.
Q24. For retailers, taking into account any operational requirements, is the proposed transition period sufficient to implement these obligations?	
Next steps and proposed implementation	
Q25. Are these the right outcome measures to track success?	No, the standardise billing need to be in the Terms and conditions given to consumers.
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?	Yes, the EA take too long to implement change you seem to be captured by the Gen Tailers ideas.
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?	
Regulatory statement for the proposed amendment	
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, must be mandatory this should have been done years ago.
Q37. Which elements of standardisation (if any) could remain voluntary without undermining consumer outcomes?	None
Q38. Do you agree with our proposed approach regarding small businesses?	
Q39. Do you agree with our assessment on alternatives to proposal B?	
Q40. Do you agree with our assessment on alternatives to proposal C?	

Q41. Do you agree with our assessment on alternatives to proposal D?	
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.	
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.	
Proposed Code amendment	
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>There is inefficiencies in the Retailer / Meter owners, Consumer, and EDB's.</p> <p>Power outage notifications should always come from the EDB direct to the consumer.</p> <p>Terms and conditions appear to favour the Retailer especially with faulty meters that lead to back charges. It should not be the consumer that takes responsibility for faulty equipment.</p> <p>Smart Meters are not being used to their capability when actual readings are up to 36 hours behind hence the need to have real time information available from the Smart Meters.</p>