

10 September 2024

Electricity Authority
PO Box 10041
Wellington 6143
By email: ccc@ea.govt.nz

0800 430 460
22 JB Cullen Drive
Ashburton Business Estate
Ashburton
Private Bag 802
Ashburton 7740
New Zealand

Proposed consumer care guidelines consultation paper 6 August 2024

1. This is EA Networks (“our”, “we”) response to the Electricity Authority’s (“Authority”) proposed Consumer Care Obligations consultation paper dated 6 August 2024 (“Consultation”). This submission is not confidential and can be published on the Authority’s website.
2. EA Networks appreciates the opportunity to discuss our concerns alongside other Electricity Distribution Businesses (EDBs) on 28 August 2024. In this submission we will take the opportunity to reiterate the conversations had within this workshop, providing an EA Networks perspective, with a particular focus on Clause 58, 69 and Clause 70 of the Consumer Care Obligations (“Obligations”).

Consultation Questions

Q12 Do you have any feedback on Part 8 of the proposed Consumer Care Obligations relating to medically dependent consumers?

Clause 58 requires retailers to provide ‘medical dependency status’ to distributors via the EIEP4 file. While this is a recognised file exchange protocol, the customer information provided by some retailers is not consistent and often incomplete or incorrect in relation to consumer contact information. We also note that some second tier (white label) Retailers refuse to provide EIEP4 information. In these situations, we only receive the name of the second tier retailer, which provides no MDC or consumer data that can be used.

Without requiring retailers (potentially through a mandated approach) to provide correct, up-to-date information within this file exchange, the information will be of minimal use to EDBs who may want to contact consumers via SMS, email or phone contact.

EA Networks suggests an improvement to the requirements for retailers to provide up-to-date information (including email and contact numbers) which would enable greater communications and messaging to all consumers impacted by outages.

For those that have this functionality, it would provide the ability to go over and above baseline requirements, which can vary amongst EDBs, but is often clearly defined within the DDAs with Retailers.

While we are suggesting this improvement, we are not recommending mandating an EDB to have the ability to receive, store and use EIEP4 information. Building this functionality comes at a significant cost and we do not agree with the Authority's view that these changes would be "unlikely to result in significant additional costs". We would also highlight that if the Authority maintained its approach to this, then a review of the date that the Consumer care obligations would take effect would also be required, given system implementations can take multiple years to implement.

Q14 Do you have any feedback on the proposed Code obligations for distributors?

Clause 69 – Distributor's obligations in event of emergency situation

EA Networks believes that there would be extremely limited situations where it would be practicable, and there would be sufficient time for a fault person to door knock on residential premises before disconnecting in emergency response situations.

When responding to an emergency, our main focus is on making the area safe and then on restoring electricity to consumers as quickly as possible. Taking time to door knock on areas would greatly reduce our ability to do both of the above.

In addition to this, EA Networks queries if customers would appreciate an unknown person knocking on their door, as opposed to just getting on with the restoration of electricity.

We would also like to highlight that the *Electricity consumer care guidelines: Overview for support agencies and health practitioners*¹ states that emergency response plans should be held by all MDCs, in the event that electricity supply is cut off.

EA Networks suggests that a more beneficial approach to door knocking, would be to encourage EDBs to update outage messaging (where appropriate, and by example, an EDB website, or safety advertising) to reiterate the need for MDCs to be prepared for power outages and to ensure they have back-up plans as required.

Clause 70 – Coordinating planned service interruption or electrical

EA Networks is extremely concerned with how Clause 70 (2) is currently drafted with a requirement that we "must not vary the time or date of a planned service interruption or electrical disconnection that will affect those medically dependent consumers, without first consulting that retailer regarding those medically dependent consumers."

We are, at times, required to vary the date and time of planned outages, often due to circumstances beyond our control, which can include, but is not limited to weather events or staff illnesses.

The requirement to consult with retailers before changing a planned outage date or time is inconsistent with existing requirements, including EIEP5A, which allows us to provide planned service interruption information to retailers. We also clearly advise alternative dates via this mechanism.

Consulting with a retailer prior to making changes will place unnecessary red tape on an EDBs ability to manage their planned outages, staffing needs and will mean unreasonable expectations are in place for an EDB to manage the impact of significant weather events. Planned work is often undertaken to facilitate new customers seeking to access our services (including for activities that help with our decarbonisation transition). Adding barriers that will defer planned work will impact on our ability to meet the needs of access seekers.

At an implementation level, we see significant overhead with this clause. It is not simply a matter of consulting with one retailer, it may require an EDB to consult with multiple retailers for one planned outage and then coordinate their

¹ <https://www.ea.govt.nz/documents/2096/Overview-for-health-and-support-agencies.pdf>

responses and requirements. Not only this, but retailers would also need to have capacity to receive increased communications from EDBs, who were all attempting to consult and modify their existing planned outages.

EA Networks recommends the removal of 'consulting' and addition of 'advising' retailers, so planned outages can be managed by the EDB effectively. It is much simpler and more effective to educate MDCs around power outages, to ensure that from a Healthcare perspective MDCs are sent home with robust emergency plans in case of outages and to continue to utilise existing channels of notifications between EDBs and Retailers.

EA Networks appreciates the invitation to engage on the upcoming changes to the Consumer Care Obligations and welcomes any further conversations with the Authority as required.

Yours sincerely



Jessica Harris
Customer Experience Manager