

Appendix D Format for submissions

Submitter	For Our Good
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Questions	Comments
Q1. Do you have any feedback on our approach to making operational improvements to the Guidelines, to ensure the proposed Consumer Care Obligations are clear, and workable?	<p>The proposed approach has positive intentions and is a good first step. However, the current approach may not effectively measure the costs and benefits of these or additional regulations.</p> <p>Without clear metrics for measuring the improvements in consumers lives or engagement with the industry, the approach might lead to flawed/perceived improvements.</p> <p>The current approach may not fully consider conflicts between government policies and industry practices, nor the challenges faced by households who are disengaged/disconnected from the industry through credit checks and screening.</p>
Q2. Do you have any feedback on the proposals to clarify the application of the proposed Consumer Care Obligations?	We support the redefinition to “residential consumer”.
Q3. Do you have any feedback on the purpose statement for the proposed Part 11A of the Code?	No.
Q4. Do you have any feedback on the compliance monitoring provisions in the proposed Part 11A of the Code, or on the Authority’s new outcomes framework?	<p>We support the direction of compliance monitoring and the framework.</p> <p>We believe more consideration is required through the framework’s development, especially around disconnection.</p>

	<p>E.g. a disconnection for long-term non-payment is different from a disconnection where a residential consumer has moved and has not informed the retailer.</p> <p>Households who do not engage and do not communicate with the retailer also require consideration as part of the disconnection framework.</p> <p>We support all households being treated with care and respect. We also support that framework including measures for both parties including the household, so that the household treats the retailer in a similar manner.</p>
Q5. Do you have any feedback on the proposed improvements to terminology?	No.
Q6. Do you have any feedback on the proposal to align standards of behaviour in the proposed Consumer Care Obligations?	No.
Q7. Do you have any feedback on Part 2 of the proposed Consumer Care Obligations relating to consumer care policies and related matters?	No.
Q8. Do you have any feedback on Part 4 of the proposed Consumer Care Obligations relating to information and records relating to consumer care?	No.
Q9. Do you have any feedback on Part 3 of the proposed Consumer Care Obligations relating to when a customer signs up or is denied a contract?	We support the additional information to be provided to households. However, providing information regarding denial could lead to an increase in the sophistication of misrepresentation of household behaviours.

	As outlined above, we believe further consideration is required for those households who are disengaged and fail to get access to power because of previous financial or other issues.
Q10. Do you have any feedback on Part 5 of the proposed Consumer Care Obligations relating to business-as-usual account management?	No.
Q11. Do you have any feedback on Parts 6 and 7 of the proposed Consumer Care Obligations relating to customers experiencing payment difficulties and disconnections?	A detailed review of the expectations / dependencies on government payment agencies operational policies could be required to ensure MSD (WINZ) understand the changes being introduced by the electricity industry and it's potential impacts on the timeliness of their payments or ongoing WINZ redirections etc.
Q12. Do you have any feedback on Part 8 of the proposed Consumer Care Obligations relating to medically dependent consumers?	No.
Q13. Do you have any feedback on Part 9 of the Consumer Care Obligations relating to fees, bonds and conditional discounts?	No.
Q14. Do you have any feedback on the proposed Code obligations for distributors?	No.
Q15. Do you agree that the benefits of the proposed Code amendment outweigh its costs?	No. In their current form, these changes likely won't significantly help long-term vulnerable households soon, although they might be seen as a positive step. We think the current and future data collection won't effectively measure the benefits or costs of the proposed changes.

	<p>The guidelines aim to standardize services for households with medical needs or payment struggles. However, regulations often increase costs for retailers and add complexity for households, which might not be able to handle more information even with help.</p> <p>Retailers might not be motivated to quickly improve conditions for vulnerable consumers if there are no implications/financial penalties for not meeting these regulations.</p> <p>We believe there hasn't been enough consideration of the costs, benefits, and the time it has taken to get where we are today, since the 2018 Consumer Price Review. In Australia, financial penalties for poor consumer treatment have made retailers focus on compliance but have also hindered innovation.</p> <p>We recommend evaluating the potential future costs of additional regulations, considering what's happening in similar markets abroad. The costs of consultations, regulations, education programmes and support since 2018 might exceed the cost of providing free power to 30,000-50,000 of New Zealand's most complex households for six years.</p> <p>While more regulations might be needed in the long run, we suggest that before taking further regulatory steps, the EA (and MBIE) should thoroughly assess the long-term costs and benefits for New Zealand's industry. They should also consider other options, such as social retailers, a community shared "pool-of-power", or regulated last-resort retailers, which have been used in other countries</p>
<p>Q16. Do you have any comments on the drafting of the proposed amendment?</p>	<p>No.</p>