



9 September 2024

Electricity Authority
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Proposed Consumer Care Obligations – Join submission by MainPower New Zealand Limited and Marlborough Lines Limited.

MainPower New Zealand Limited (MPNZ) and Marlborough Lines Limited (MLL) thanks the Authority for the opportunity to make this submission.

Nothing in this submission is considered to be sensitive and the whole submission can be published.

MPNZ and MLL are both consumer owned EDBs, MLL operates under an interposed arrangement whereas MPNZ operates under the conveyance model where it has a direct relationship with its customers for the provision of lines services.

Both MPNZ and MLL share the concerns documented by the ENA and Vector in their respective submissions. We would also like to make the following comments in response to Question 14 - Do you have any feedback on the proposed Code obligations for distributors?:

- Clause 58 – we support the comments of Vector and the ENA in relation to EIEP4. If a retailer is required to advise the distributor that a customer is medically dependent via EIEP4, this suggests that the Authority intends for EIEP4 to be made mandatory rather than voluntary. As noted by the ENA, use of EIEP4 is inconsistent across retailers and distributors. The information is often out of date and mandatory provision carries a risk of privacy breaches. EIEP4 should only be made mandatory after a full assessment of its usefulness and any legal and privacy implications of requiring retailers to share customer information with EDBs through the EIEP4 mechanism.
- Clause 69 requiring EDBs to undertake door knocks in the event of emergency disconnections is unrealistic and places unnecessary risk on staff and the wider community. EDBs will often attempt to advise customers of a disconnection in an emergency either in person or by message, however mandating this obligation will create an expectation of advice and risks creating unreasonable expectations or reliance on the part of consumers.

- Clause 70 – planned outages are best managed through the default price path provisions and EIEP5A. To include the requirements in clause 70 adds an unnecessary confusion. We support the recommendation of Vector that there should simply be a requirement for an EDB and retailers to agree the process for managing medically dependent consumers. This could be incorporated into the DDA or use of system agreement relatively simply.
- We endorse Vector’s and the ENA’s submissions that the 2021 guidelines should be retained. There was extensive work done by ERANZ and health practitioners to arrive at principles that could work for everyone and ensured that the medically dependent customers, medical practitioners, retailers and EDBs all played a part in protecting MDCs. We would support more work to ensure these guidelines are understood and followed.
- Communication – EDBs and retailers have evolved arrangements that work for them and should retain the flexibility to allow these arrangements to continue. We would support documenting any such arrangement via the DDA for interposed networks or use of system agreement for conveyance networks.

Please do not hesitate to contact Sarah Barnes (MainPower) should you have any questions.

Yours faithfully



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