



Momentous Consulting Limited

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Proposed Consumer Care Obligations

Thank you for the opportunity to provide feedback on the proposed 'Consumer Care Obligations'. Momentous Consulting Limited works with new participants entering the electricity market and assists existing participants with compliance applications. New participants and staff of existing participants, often find the Code quite confusing and complex, wanting better understanding as to the application of some requirements. This proposed Code amendment adds to this complexity and appears to be quite standalone which could lead to some duplication with other areas of the Code.

Our considerations in this submission have been viewed with the recommendations to incorporate as much of the proposed 'Consumer Care Obligations' into existing parts and only have those not addressed elsewhere in the Code included in the new Part 11A. We consider there is still a need for some brief guidelines to assist with the application and understanding intent behind Code obligations.

With regards to monitoring and enforcing the new obligations, we consider there needs to be more work done in this area to ensure consistency and accuracy. The Authority already has an audit regime that could be unitized to include adherence to obligations and eliminate the need for added requests from participants as part of a monitoring plan. Using an appropriate "independent" person (as suggested in the proposal) to provide reviews will only lead to inconsistent and different opinions. Using approved auditors and including obligations in the existing audit process will eliminate some costs for participants.

Yours sincerely

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Director/Consultant

Momentous Consulting Limited