

Appendix D Format for submissions

Submitter	<p>Sustainability Trust – Toast Electric 2 Forresters Lane, Te Aro Wellington</p> <p>Philip Squire Fair Energy Manager</p> <p><u>Phil.squire@sustaintrust.org.nz</u></p>
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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>We applaud the Electricity Authority for making the move to mandate the Consumer Care Guidelines and develop the CCO.</p> <p>Sustainability Trust as an electricity retailer and energy hardship solution provider/advocate appreciates the complexities in setting standards for commercial entities in their relationships with the most vulnerable.</p> <p>We appreciate that there has been a degree of operational flexibility built in that addresses the broad outcomes sought by the CCO.</p>	
Q2. Do you have any feedback on the proposals to clarify the application of the proposed Consumer Care Obligations?	
No specific feedback. We agree with the clarification	
Q3. Do you have any feedback on the purpose statement for the proposed Part 11A of the Code?	
No specific feedback. We agree with the purpose statement.	
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?	
We broadly agree with the proposed compliance monitoring provisions. However, as a small retailer, with limited capacity, higher levels of reporting may be unduly onerous and costly and possibly counterproductive in being able to achieve our social mission. We are keen to see provisions for	

smaller retailers for appropriate levels of reporting and monitoring that avoid unintended consequences.	
Q5. Do you have any feedback on the proposed improvements to terminology?	
No specific feedback. We agree with the clarification	
Q6. Do you have any feedback on the proposal to align standards of behaviour in the proposed Consumer Care Obligations?	
No specific feedback. We agree with the alignment of standards of behaviour	
Q7. Do you have any feedback on Part 2 of the proposed Consumer Care Obligations relating to consumer care policies and related matters?	
No specific feedback. We agree with the clarification.	
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 specific feedback. We agree with the clarification.	
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?	
No specific feedback. We agree with the provisions.	
Q10. Do you have any feedback on Part 5 of the proposed Consumer Care Obligations relating to business-as-usual account management?	
<p>We broadly agree with the provisions.</p> <p>However, we have some concerns around the form of annual advising of customers re regarding access to consumption data. As a new (and small retailer) we do not currently have the capacity to provide an app or website with daily/hourly usage data. We can supply access to monthly consumption data but currently incur reasonably significant costs to provide detailed (e.g. half-hour) consumption information for data requests by customers. Clarification as to what constitutes “consumption information” would be helpful. For example would we comply if we notified customers that we can supply access to monthly data (in Toast’s case the monthly totals are on the bills in the form of a graph), but that HH data would incur a charge.</p>	
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?	
We broadly agree with the provisions for Parts 6 and 7, and have the following comments:	

<p>37: 2c. The outcome of this clause is to satisfy the retailer that a customer who is at risk of disconnection is fully aware of the pending disconnection and has been given opportunity to respond. Practically there are situations where a customer will either not respond to any communications in 37:3. So this then obliges the retailer to conduct a physical visit by a representative. We note that the physical visits to a customer facing disconnection may be delivered by a wide range of local representatives with likely inconsistencies in approaches and quality. As part of the annual CCO reporting we favour documentation of this process including the organisations delivering the site visit.</p>	
<p>Q12. Do you have any feedback on Part 8 of the proposed Consumer Care Obligations relating to medically dependent consumers?</p>	
<p>We agree broadly with the provisions for medically dependent consumers. However, we would like to see code clarification on a couple of issues;</p> <ol style="list-style-type: none"> 1. A retailer can not refuse to sign up a customer solely based on their nomination as medically dependent. If a retailer would normally sign up a customer (e.g. passed credit check), then a retailer should not be able to refuse onboarding based on medically dependent status. 2. A retailer must continue to supply electricity to a consumer that identifies as medically dependent until such time as the ICP identifier switches to another retailer. 	
<p>Q13. Do you have any feedback on Part 9 of the Consumer Care Obligations relating to fees, bonds and conditional discounts?</p>	
<p>We broadly agree with the provisions.</p> <p>However, we would like to see disconnection and reconnection fees for cases where this occurs for reasons of non-payment mandated against.</p>	
<p>Q14. Do you have any feedback on the proposed Code obligations for distributors?</p>	
<p>We broadly agree with the provisions.</p> <p>We do, however, note workability issues around maintaining currency of MDC status across multiple distributors and MEPs, with customers entering and exiting ICPs, as well as confirming/reconfirming/changing MDC status. Noting status of ICP on the registry as MDC, and cancellation of the status on change in trader (and reconfirmation if appropriate) may be a more effective solution.</p>	
<p>Q15. Do you agree that the benefits of the proposed Code amendment outweigh its costs?</p>	
<p>We broadly agree with the analysis</p>	

However, as noted previously, smaller retailers, such as Toast, may bear disproportionate costs if reporting requirements and timeframes, and data provision costs are developed based on larger retailers' capacities.	
Q16. Do you have any comments on the drafting of the proposed amendment?	
No comments	