

10 September 2024

Electricity Authority
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Via email: ccc@ea.govt.nz

Proposed Consumer Care Obligations – Consultation paper

The Lines Company (TLC) appreciates the opportunity to provide feedback on the Electricity Authority's (Authority) consultation paper and begins by offering a few recommendations.

Recommendations for the Authority:

1. Regulate Electricity Information Exchange Protocols (EIEP) EIEP4.
2. Adjust the Consumer Care Obligations so that they are practicable.
3. Transition in and implement from mid-2025 e.g. maybe 1 May 2025.

Introduction

The Authority is consulting with interested parties on the proposal to introduce Part 11A: Consumer Care into the Electricity Industry Participation Code 2010 (Code). The proposal will mandate the recommendations in the existing Consumer Care Guidelines, with operational changes to resolve clarity, workability and enforceability issues identified with the Guidelines. The proposed Consumer Care Obligations will primarily apply to retailers who contract with residential consumers, with a small number of obligations on distributors. The Authority wants to hear from retailers and distributors on whether the proposed Code amendment is clear and workable.

TLC is supportive

TLC supports the Authority's proposal to mandate the Consumer Care Guidelines but stresses the importance of practicality. TLC appreciates the Authority's engagement thus far, especially in considering concerns about practicality. TLC also endorses the submission from Electricity Networks Aotearoa (ENA), as all our concerns are covered in that document. Therefore, we have kept our submission brief, adding comments only on two points: regulating EIEP4 files and the proposed implementation date.

Detail

- **EIEP4: Customer information¹**

This protocol allows traders to provide customer information to distributors either as snapshots or incremental files. Changes in customer details trigger a report sent to the distributor. TLC has a Use of System Agreement (Conveyance) with retailers, which requires them to regularly supply TLC with EIEP4 files.

¹ https://www.ea.govt.nz/documents/190/EIEP4_Customer_information.pdf

While TLC generally finds the quality of these files satisfactory, we question whether it makes sense to mandate the Guidelines without first regulating EIEP4 files. The EIEP Overview states²:

“EIEPs are either regulated or non-regulated. Regulated formats include EIEPs 1, 2, 3, 12, and 13. Non-regulated EIEPs may be adopted in contracts between traders and distributors (normally use of system agreements), and between retailers and field services providers. These EIEPs may vary in the information that they contain depending on arrangements between the parties or as their systems may dictate.”

Since varying arrangements exist between Traders and Distributors, and the EIEP4 seems to be the main source for notifying medical-dependent customers, mandating the Guidelines without regulating the notification seems illogical.

- **Proposed Implementation Date: 1 January 2025**

Implementing a mandatory obligation on 1 January 2025 is problematic, as it coincides with New Zealand's holiday season and a time of industry focus on communication and educating consumers due to price changes and the 2025 reset of the electricity default price-quality path.

TLC recommends transitioning to full mandatory implementation of the Guidelines toward the middle of next year, with a possible date of 1 May 2025.

Summary

TLC supports the proposal to mandate guidelines ensuring consumers receive the care they need, given the essential nature of electricity for healthy, prosperous lives. However, consideration must be given to practicability, required information, and timing.

For further information, please contact Craig G. Donaldson on craig.donaldson@thelines.co.nz or Anne Terry.

Yours sincerely



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² https://www.ea.govt.nz/documents/173/EIEPs_overview.pdf