

2 October 2023

Distribution Feedback
Electricity Authority
PO Box 10041
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consumercareconsultation@ea.govt.nz

Dear Electricity Authority,

Consultation – Improving the Consumer Care Guidelines

Wellington Electricity Lines Limited (WELL) supports making mandatory parts of the Consumer Care Guidelines to improve protection of electricity consumers. However, while the Consumer Care Guidelines are retailer-focused, there are two clauses that impact distributors and in their current state, should not be mandated.

Clause 88 asks distributors to not vary planned outage times without conferring with retailers first. This requirement is manageable across most situations. However, in some situations, there are safety reasons for the crew on site to vary an outage end time because a job is taking longer than expected to be completed safely. Given the unpredictable nature of some outage work, it is impractical to contact retailers before extending a planned outage. This would require the work to stop while conferring with a retailer, ultimately extending the length of the outage unnecessarily.

Distributors have an incentive to stay within outage timeframes under price-quality regulated SAIDI values. Distributors could be unfairly penalised by adding another mandated interruption measurement. Changes in the way outages are being sent by distributors is improving through EIEP5A regulation, which will provide retailers with the most up-to-date outage information for notifying their customers.

Clause 101 (a) is not always practical for distributors to deliver, and 101 (b) implies that distributors are made aware of MDCs, which is not generally the case. The duty of care lies with the retailer and remains for them to contact their customers when notified of an emergency disconnection requirement. WELL currently supports this requirement through its unplanned outage retailer notification process and puts the retailer in the best position to inform their customers.

WELL also disagrees with the statement that “[implementation/operating costs would] be minimal if [distributors] are already aligned with the Guidelines” for the clauses 88 and 101. Any changes that mandate the provision of data currently not provided would incur additional costs for both retailers and distributors, especially if the information is private and confidential.

WELL has taken steps to align with the Consumer Care Guidelines and appreciates the opportunity to provide a submission on ‘Improving the Consumer Care Guidelines’. If you wish to discuss our submission, please contact me at Chloe.Sparks@welectricity.co.nz.

Yours sincerely,

Chloe Sparks
Economic Regulatory and Pricing Specialist



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