

27 November 2020

Submissions
Electricity Authority
PO Box 10041
Wellington 6143

by email: mdvc.guidelines@ea.govt.nz

Response to consultation paper- consumer care guidelines

1. Orion New Zealand Limited (Orion) welcomes the opportunity to provide a submission on the consultation on consumer care guidelines to the Electricity Authority (the Authority).
 - a. Our information covers our response to your specific questions.
 - b. Our submission relates to Part 8: Additional recommendations for medically dependent consumers.

Concluding remarks

2. Thank you for the opportunity to provide this submission. We do not consider that any part of this information is confidential. If you have any questions please contact Dayle Parris (Interim GM Commercial), DDI 03 363 9874, email dayle.parris@oriongroup.co.nz.

Yours sincerely



Dayle Parris
Interim GM Commercial



Submission by Orion on Consumer Care Guidelines

Appendix A

Our submission relates to Part 8: Additional recommendations for medically dependent consumers

Question	Response
Should we include a Part making additional recommendations specific to MDCs? Or, should we have recommendations relating to MDCs throughout Parts 4-7?	Orion supports a dedicated part, Part 8, for making additional recommendations specific to medically dependent customers.
Do you agree in general with the recommendations in this Part? If yes, please tell us if the meaning is clear?	Yes, we agree in general on the recommendations in this part however we have some specific comments as follows: Point 83- the customer care guidelines have been developed after the default distribution agreement wording and terms have been finalised. We suggest that the Authority proposes default wording for the DDA that conveys the intent of point 83 and that could then be incorporated consistently into DDAs across participant agreements as a recorded term.
Do you have feedback on the drafting of specific clauses in this Part? Do you suggest alternative wording? Or is there any superfluous or missing text?	Point 96- It is not clear whether the emergency requirements are in general or specific to an individual household in the event of non-payment only. We cannot identify a situation where an emergency disconnection would be carried out as a direct result of non-payment. We suggest that a separate heading before point 96 saying "Individual disconnection in event of emergency situation" would assist with clarity and intent. In a more general emergency, such as a car accident impacting our network or network failure in the road carriageway, it is not possible for a distributor to contact every individual household before the power goes off as there is often a higher order threat/risk to be managed. Similarly, in the event of a fire that may impact a neighbouring property time may not permit due to the immediate threat. Point 96 should be made clearer to indicate that the requirements relate to a specific household in the case of emergency disconnection. Also, while the consultation document suggests this is "if time permits and it is practicable to do so" ¹ this has not been included in the guideline wording- we submit that it should be to reflect operational practicalities.

¹ Consumer care guidelines consultation paper point 160