

29 November 2021

Utilities Disputes Submission on the Gas Industry Co. Extending the Electricity Price Review's Final Recommendations to the Gas Market

Utilities Disputes: Tautohetohe Whaipainga (UDL) welcomes the opportunity to submit to the Gas Industry Co. (GIC) on its final guidelines for Dealing with Vulnerable Consumers and Raising awareness of Utilities Disputes and Powerswitch.

Summary of submission

We generally support the GIC's intention and application in extending the Electricity Price Review's final recommendations to the gas market, including guidelines around raising awareness of UDL, and Consumer Care Guidelines (CCG) for the gas sector. The GIC's guidelines for raising awareness of UDL are consistent with our scheme rules.

Background of UDL

UDL is an independent, not-for-profit company that provides resolution for complaints in the utilities sector that companies have not been able to resolve, including gas complaints. We consider cases between consumers and scheme members, and indemnity disputes between scheme members.

We aim to facilitate a strong relationship of trust between consumers and utilities organisations. We focus on three key aspects of effective complaints resolution: Prevent, Educate and Resolve.

We currently operate three dispute resolution schemes: The Government approved Energy Complaints Scheme and Broadband Shared Property Access Disputes (BSPAD) Scheme, and the voluntary Water Complaints Scheme. Our model includes early resolution, conciliation, investigation and if needed a binding determination by a centralised decision maker.

Raising Awareness of Utilities Disputes

We are comfortable with the GIC's final Utilities Disputes and Powerswitch Guidelines. The GIC has updated these to remove the earlier proposed limitation on the sorts of complaints where retailers must inform consumers of UDL. The current version is now consistent with UDL's requirements in our energy scheme rules and remains inconsistent with the Electricity Authority's (EA) Code requirements where every consumer query to an electricity Market Participant is required to be informed about UDL.

Consumer Care Guidelines

We broadly support the GIC's move to closely align the wording of the gas CCGs with the EA's Consumer Care Guidelines for Electricity consumers. However, we note one potential area of inconsistency around the definition of making 'reasonable efforts' to contact a consumer before disconnecting for non-payment of gas services.

It is not clear that the Gas CCGs have mirrored the EA's Consumer Care Guidelines for Electricity Consumers' requirement for retailers to use and successfully complete a traceable form of contact at least once before disconnecting a customer's premises for non-payment.

It is unclear why this wording has not been carried over. We believe the Gas CCGs should mirror the wording used in the EA's CCG (clause 57.a.iii) because a traceable form of contact is the closest a retailer can get to ensuring they have made contact with the customer about the pending disconnection.

Next steps

If we can be of further assistance, please contact Paul Moreno, Research and Reporting Manager directly at p.moreno@utilitiesdisputes.co.nz or on 04 914 4535.

Nāku, nā



Mary Ollivier

Commissioner; Komihana

Utilities Disputes: Tautohetohe Whaipainga