



Extending the Electricity Price Review's Final Recommendations to the Gas Market – Final Gas Consumer Care Guidelines

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Gas Industry Co.



Executive Summary

In April 2018, the Government appointed an advisory panel to investigate whether the current electricity market delivers “efficient, fair and equitable prices [to customers]” (Electricity Price Review or EPR). That panel issued its final report in May 2019 (Report).

Gas Industry Co established a workstream to investigate the application of the 32 EPR recommendations to the natural gas and LPG (Gas) markets.

Gas Industry Co conducted a consultation process on these EPR recommendations and published its final recommendations on 8 March 2021.

Gas Industry Co has also conducted a consultation process on new Gas market guidelines for:

- dealing with vulnerable Gas consumers (EPR recommendation B6);
- raising Gas consumer awareness of Utilities Disputes and Powerswitch (EPR recommendation C2); and
- saves and winbacks behaviour in Gas markets (EPR recommendation C5).

On 9 November 2021 Gas Industry Co issued final Gas market guidelines for raising Gas consumer awareness of Utilities Disputes and Powerswitch, and for saves and winbacks behaviour. It also issued final guidelines for dealing with vulnerable Gas consumers (Gas Consumer Care Guidelines), with consultation on identified specific issues in those guidelines.

Gas Industry Co has reviewed and analysed the submissions it received on the Gas Consumer Care Guidelines. This analysis and Gas Industry Co’s recommendations are set out in this paper.

Gas Industry Co has also prepared a draft Notice of Potential Medically Dependent Consumer (MDC) Status, and a template Gas Consumer Care Policy for retailers. Gas Industry Co is now seeking submissions on these documents.



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1. Purpose and Process Update

Purpose

This paper assesses the submissions received by Gas Industry Co on the draft Gas Consumer Care Guidelines (EPR recommendation B6), as published by Gas Industry Co on 11 November 2021.

Process Update

Gas Industry Co has reviewed and analysed submissions received on the Gas Consumer Care Guidelines and has amended the Gas Consumer Care Guidelines to take account of stakeholder submissions.

Submissions Overview

Gas Industry Co received submissions from:

- Nova Energy Limited (Nova);
- National Building Financial Capability Charitable Trust (FinCap);
- Utilities Disputes Limited (UDL);
- Vector Limited (Vector); and
- FirstGas Limited (FirstGas).

Broadly, the submissions were supportive of the new voluntary Gas Consumer Care Guidelines.



2. Gas Consumer Care Guidelines

Revised Gas Consumer Care Guidelines

Final Gas Consumer Care Guidelines are set out in Appendix A.

These revised Gas Consumer Care Guidelines are marked up to show the changes made by Gas Industry Co to the draft guidelines published on 11 November 2021, in response to stakeholder submissions.

Submissions Summary

A summary of all submissions received on the Gas Consumer Care Guidelines is set out in Appendix B.

There was broad support for the Gas Consumer Care Guidelines.

The following is an overview of submitter responses to the questions set out in the 11 November 2021 consultation paper.

Do you agree with the proposed content of the Gas Consumer Care Guidelines? Are there items that should be added or deleted, and why?

- Submitters were supportive of amending the Gas Consumer Care Guidelines to include protections for consumers that are medically dependent on Gas.
- Nova and Vector both questioned whether there are circumstances in which customers are medically dependent on Gas (with Vector's focus on LPG) however they effectively confirmed they will respect the guidelines if consumer medical dependence on Gas can be established.
- Gas Industry Co considers that consumer medical dependence on Gas is established.
- Gas-fuelled equipment that supports a critical health treatment regime (such as medically required heating or refrigeration) does exist.
- Although Gas Industry Co does not have data on the number of Gas customers that might be reliant on Gas to fuel equipment needed to support a critical medical treatment programme, the consequences of even one consumer being denied access to the fuel necessary to operate this equipment, are so grave that in Gas industry Co's view, it is prudent to extend the protections in the EA CCGs for medically dependent electricity consumers, equally to Gas customers.
- Vector raised additional concerns about the provisions in the Gas Consumer Care Guidelines relating to 45kg LPG bottles, used by medically dependent consumers. Vector is concerned that the guidelines suggest that bottled LPG services "run out all the time", perhaps overstating the service interruption risks associated with relying on a bottled LPG service.
- Gas Industry Co acknowledges that bottled LPG services do not "run out all the time". However, they do run out if the LPG cylinder is depleted, prior to replacement with a new cylinder (similar to a pre-pay electricity service). Gas Industry Co has made an

amendment to the Gas Consumer Care Guidelines, to reflect this service interruption risk more accurately.

- Finally, Vector requested clarity on how Gas retailers, particularly standalone Gas retailers, can identify medically dependent consumers, and on the privacy implications of handling MDC data that is provided by other parties (noting it is the current practice of Vector's OnGas LPG business to treat any customer who is a pensioner as a vulnerable customer).
- Gas Industry Co notes that the Gas Consumer Care Guidelines give guidance on how retailers of natural gas, reticulated LPG and 45kg LPG bottles should deal with customers to identify whether or not a verified or unverified MDC is present at a customer's premises. The storage of this MDC information should be carried out in the same way the retailer stores all other personal information it holds on a customer, on the terms of the Privacy Act.

Do you support the development of new Gas Information Exchange Protocols, adopting relevant provisions from the corresponding information exchange protocols in the electricity market, addressing the exchange of MDC information?

- There is broad support for the development of new gas information exchange protocols (GIEP) adopting relevant provisions from the corresponding information exchange protocols in the electricity market – but only on the assumption that there are circumstances in which customers are medically dependent on Gas.
- As set out above, Gas Industry Co considers that consumer medical dependence on Gas is established.
- Vector also seeks clarity around the applicability of a new GIEP for the exchange of MDC information in the case of 45kg bottled and reticulated LPG, as there is no central registry for these types of Gas customer.
- Gas Industry Co confirms that the GIEP proposed to be developed will not apply to 45kg LPG bottles, nor will it apply to reticulated LPG. Gas Industry Co confirms it will consult on the form of GIEP, once drafted.
- FinCap suggests that Gas Industry Co goes further and develops exchange protocols that ensure a medically dependent consumer remains protected where a customer changes providers or where multiple entities ensure supply but only one has a relationship with the end user. FinCap encourages Gas Industry Co to discuss these issues with the Essential Service Commission, Australian Energy Market Commission and Australian Energy Regulator, as these agencies have (according to FinCap) done extensive work on consumer life support protections in Australia.
- Relevant Australian examples of information exchange is a matter to be considered as part of the development of the new GIEP. However, Gas Industry Co notes the benefits of alignment of processes in the New Zealand gas and electricity industries.

Additional Submissions Reviewed

A number of submissions beyond the scope of the two questions relating to the Gas Consumer Care Guidelines were received and have been reviewed by Gas Industry Co.

A summary of these additional submissions, and Gas Industry Co's responses to those submissions, is set out in Appendix C.

Key issues raised in these additional submissions are set out below.

Traceable contact

- UDL broadly supports Gas Industry Co's move to closely align the wording of the Gas Consumer Care Guidelines with the EA's CCGs for electricity consumers. However, UDL notes one potential area of inconsistency around the definition of making 'reasonable efforts' to contact a consumer before disconnecting for non-payment of gas services.
- UDL considers the Gas Consumer Care Guidelines should mirror the wording used in the EA's CCGs (in 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.
- Whilst Gas Industry Co considers that the substance of the EA's CCGs have been transferred to the Gas Consumer Care Guidelines, it acknowledges that explicitly adding the requirement that a traceable form of contact must be made prior to disconnection, is a reasonable and prudent measure to ensure vulnerable customers are informed about a pending disconnection.
- Gas Industry Co has made an amendment to the Gas Consumer Care Guidelines to reflect this new requirement.

'Compliance' with voluntary guidelines

- Firstgas has strong concerns with how the GIC has signalled that it will monitor 'compliance' with the voluntary guidelines. In Firstgas's view, compliance is not possible when the guidelines are established as voluntary. Rather the focus should be 'alignment' with the guidelines.
- Gas Industry Co considers that 'compliance' with voluntary, and non-prescriptive guidelines, is correct and appropriate use of terminology. Measuring compliance with non-prescriptive guidelines will involve a level of subjective interpretation by Gas Industry Co, however it is expected that any uncertainty this might create will be more than offset by the flexibility the non-prescriptive guideline approach will afford to retailers in developing compliance or alignment strategies.



3. Gas Consumer Care Guidelines Supporting Documents

Notice of Potential MDC Status

Gas Industry Co has prepared a draft Notice of Potential MDC Status form. This form is based very closely on the form currently used by the EA in respect of the EA's CCGs.

This form is intended to be completed by the person that is claiming medically dependent Gas consumer (MDC) status, and the prescriber or supplier of the relevant Gas-fueled equipment forming part of the applicant's critical care regime (for example, a DHB, private hospital or GP).

Part A of the Notice contains the patient's details, an alternate contact, and the Gas account holder's details for the household where the patient with the critical Gas-fuelled medical equipment will be residing.

Part B of the Notice details the fact of the patient's actual MDC status at the point of signing the Notice, that they have received appropriate training and education about the critical medical equipment, and what to do in an emergency. This section also details who the patient's prescribing health practitioner, or designated health practitioner, is (as defined in section 5 of the Health Practitioners Competence Assurance Act 2003). The Notice is signed and dated by both the patient and the health practitioner.

A draft of the Notice is set out in Appendix D.

Template Gas Consumer Care Policy

Gas Industry Co has prepared a template Gas consumer care policy for use by Gas Retailers (Policy Template).

The Policy Template can be used by Retailers to comply with the requirement in the Gas Consumer Care Guidelines that Retailers shall publish a Gas consumer care policy.

The Policy Template is based on the Consumer Care Policy template developed by an ERANZ-led working group, for use by electricity retailers. Gas Industry Co thanks ERANZ and the ERANZ working group for supporting the development of this Gas market equivalent policy.

A draft of the Policy Template is set out in Appendix E.



Appendix A – Gas Consumer Care Guidelines

Definitions

"alternate contact person" means a person who has been authorised by a customer, or an MDC or unverified MDC who permanently or temporarily resides at the customer's premises, to operate as either the primary contact person for the customer or as an alternate contact person if a Retailer is unable to contact the customer. The alternate contact person must be independent of the Retailer.

"consumer" means an end user of gas and distribution services used fully or partly for domestic (residential) purposes.

"customer" means a person who has entered into a contract with a Retailer for the supply of Gas, other than for resupply, and/or the provision of distribution services, where the Gas supplied to the customer's premises is used fully or partly for residential uses.

"emergency" means an event that threatens the health or safety of a person, or damage to property.

"Gas" means natural gas or LPG.

"Gas distributor" means a "gas distributor" as defined in the Gas Act 1992.

"Gas Information Exchange Protocols" means the information file formats that have been approved and published from time to time by the Gas Industry Information Exchange File Formats Working Group.

"Gas Switching Rules" means the Gas (Switching Arrangements) Rules 2008.

"GP" means general medical practitioner.

"Guidelines" means these Gas Consumer Care Guidelines.

"health practitioner" or "HP" means a person who is, or is deemed to be, registered with an authority as a practitioner of a particular health profession, provided the authority is a body corporate appointed, by or under, the Health Practitioners Competence Assurance Act 2003, as the body that is, in accordance with the Health Practitioners Competence Assurance Act, responsible for the registration and oversight of practitioners of a particular health profession.

"HP Notice" means a notice completed by a health practitioner with an appropriate scope of practice, as that term is defined in section 5 of the Health Practitioners Competence Assurance Act 2003, which verifies that a person is a medically dependent consumer. The standard form of HP Notice is available on the Gas Industry Company's website.

"LPG Bottle" means a 45kg LPG bottle.

"LPG Retailer" means any person who supplies LPG to a customer by reticulated distribution network or in LPG Bottles.

"medically dependent consumer" or "MDC" means a residential consumer, whether a customer of a Retailer or a person permanently or temporarily resident at a residential customer's premises, who depends on Gas for critical medical support, such that loss of Gas may result in loss of life or serious harm. For the avoidance of doubt, medical dependence on Gas could be for use of medical or other Gas equipment needed to support the critical medical treatment regime (e.g., where hot water, medically-required heating or medically required refrigeration are required as part of a critical medical treatment regime).

"metering service provider" means the provider of Gas metering services to a Retailer.

"Natural Gas Retailer" means any person who supplies natural gas to a customer.

"Retailer" means a gas retailer (natural gas or LPG) as defined in the Gas Act 1992.

"social agency" means a government agency with a statutory function or role to assist low-income consumers or consumers facing payment difficulties.

"support person" means a person who has been authorised by a customer or an MDC who permanently or temporarily resides at a customer's premises, to assist the customer or MDC with any issues related to the customer's Gas supply. The support person must be independent of the Retailer.

"support agency" means a non-government agency that offers assistance to low-income consumers or consumers facing payment difficulties, including in relation to budgeting, financial assistance, energy efficiency, and counselling.

"uncontracted premises" means a residential premise that a Retailer is supplying Gas to, without a current Retailer supply contract.

"unverified MDC" means:

- (a) a person who has applied for MDC status but a decision on the application has not yet been made in accordance with clause 10) by the Retailer to whom the application was made; or
- (b) a person whom a Retailer believes could be an MDC, unless the Retailer has made reasonable efforts to contact the person in accordance with clause 10) k) and the person has not made an application for MDC status.

1) Purpose

- a) The purpose of Gas Consumer Care Guidelines is to guide Retailers in helping residential Gas consumers minimise harm caused by insufficient access to Gas or by payment difficulties in relation to the supply of Gas.
- b) These Gas Consumer Care Guidelines should always be read to favour an outcome that achieves their purpose.

2) Scope

- a) These Gas Consumer Care Guidelines apply to all Retailers selling natural gas, reticulated LPG and/or LPG Bottles to customers.
- b) Compliance with these Gas Consumer Care Guidelines is voluntary.
- c) The Gas Industry Company's Retail Gas Contract Benchmarks (as restated and amended) (Retail Gas Contract Benchmarks) remain in effect. Retailers must ensure

their residential consumer contracts comply with Gas Industry Company's Retailer Contracts Scheme Benchmarks (as amended from time to time). To the extent there is any inconsistency between the Retail Gas Contract Benchmarks and these Gas Consumer Care Guidelines, the Retail Gas Contract Benchmarks shall prevail.

3) Principles

- a) Retailers should engage with customers in a manner consistent with the following four principles (Principles):

(i) Consumer care:

- (1) Retailers will work to minimise the harm caused by a customer losing access to Gas (including by disconnection of natural gas, or disconnection and repossession of LPG Bottles).
- (2) Customers facing difficulties paying for Gas supply should be supported by their Retailer, including by helping:
 - (a) customers to be on the most appropriate pricing plan and payment plan; and
 - (b) prevent customers accumulating debt over Gas supply.
- (3) Retailers will seek to keep customers connected, avoiding disconnection for an unpaid Gas invoice, by implementing these Gas Consumer Care Guidelines, and only use disconnection (or disconnection and repossession) as a last resort measure and only in relation to a customer's undisputed debt over Gas supply.

(ii) Positive consumer and retailer engagements:

- (1) Retailers will engage with customers and persons permanently or temporarily resident at such a customer's premises, with care and respect.
- (2) Consumers interacting with Retailers should receive at least a minimum standard of treatment regardless of the Retailer and regardless of whether they are a customer of the Retailer.
- (3) Customers should engage with Retailers in good faith and respond to Retailer communications to avoid or minimize non-payment issues.

(iii) Retailers have a right to be paid for services delivered and competition and innovation are supported:

- (1) Retailers are entitled to be paid for Gas services supplied to a customer.
- (2) Retailers operate on a level playing field where all competitors align with these Gas Consumer Care Guidelines.
- (3) These Gas Consumer Care Guidelines should not place undue costs or constraints on Retailers, or limit competition or innovation.
- (4) Retailers have clear, predictable, consistent and effective processes and interfaces to use when engaging with support/social agencies and health agencies about matters covered by these Gas Consumer Care Guidelines.

(iv) Monitoring performance:

- (1) Retailers should reasonably cooperate with Gas Industry Company to ensure efficient and effective monitoring of compliance with these Gas Consumer Care Guidelines.

4) Retailers to publish a consumer care policy

- a) Retailers should publish a consumer care policy, which:
 - (i) explains the arrangements they have in place or are putting in place, and the actions they are undertaking to:
 - (1) achieve the Principles; and
 - (2) align with these Gas Consumer Care Guidelines; and
 - (ii) commits the Retailer to:
 - (1) working with its customers in a respectful, collaborative and constructive manner, recognising the contribution of Gas supply to the wellbeing of consumers;
 - (2) having timely and clear communications with consumers;
 - (3) seeking customer agreement for referrals to support/social agencies should the customer experience payment difficulties; and
 - (4) clearly explaining in a prominent place all fees, conditional discounts and bonds charged by the Retailer to the customer.
- b) Retailers should review and, as reasonably appropriate, update their consumer care policy at least every two years.

5) Information and records relating to consumer care

- a) Retailers should have and use processes and systems to request, record, allow them to access and ensure that they use information on customers' communication preferences (communication type and method, timing and language), invoicing preferences (frequency, timing and communication means) and alternate contact and support person communication details.
- b) Retailers should have and use processes and systems to record, allow them to access, and ensure that they use, information that relates to a customer's potential to experience payment difficulties and/or harm arising from difficulty accessing Gas (including by disconnection of natural gas, or disconnection or repossession of LPG Bottles).

6) When a customer signs up to, or is denied a contract

- a) Retailers should make information easily available so that persons signing up to the Retailer, or considering doing so, are able to make informed decisions.
- b) Retailers should advise each prospective customer of the range of Gas supply plans (natural gas and LPG) and solutions available from the Retailer, and help each person understand which of the Retailer's Gas offerings best meet the person's needs.

- c) If a customer nominates an alternate contact person, Retailers should seek the contact person's agreement to act in that capacity.
- d) Retailers should reasonably satisfy themselves that new customers have reviewed the Retailer's terms and conditions, and agree to the same.
- e) Each Retailer should advise new customers of the existence of the Retailer's consumer care policy and the Retailer's commitment to offer support if the customer faces payment difficulties.
- f) Retailers considering entering a consumer contract with any person enquiring with the Retailer should carefully consider all relevant information rather than just the person's credit record.
- g) Retailers that decide not to enter a consumer contract with a person enquiring with the Retailer should:
 - (i) advise the person of the reason for the Retailer's non-supply decision; and
 - (ii) reasonably support the person to find an alternative Retailer, or if the person indicates that they are struggling to find a Retailer, refer the person to a reputable support/social agency.
- h) Retailers should advise each new customer of the process that will be followed if a Gas invoice is not paid when due and the customer does not engage with the Retailer about payment.
- i) For LPG Bottle customers, LPG Retailers should advise customers:
 - (i) of any cost differential between the Retailer's post-pay and pre-pay LPG Bottle payment arrangements, including, but not limited to, fees, bonds, equipment charges and the cost of Gas purchased under each arrangement;
 - (ii) the customer's obligations and liability in relation to the Retailer's LPG Bottles supplied to the customer including the Retailer's rights to repossess its LPG Bottles (and how any LPG contained within such bottles at the time of repossession is dealt with); and
 - (iii) that when the pre-paid LPG Bottle is used up, resupply will only occur if an order is placed and pre-payment for the replacement LPG Bottle is received (and in the absence of resupply, the customer will cease to have access to LPG).

7) Account management

- a) Retailers should interact at least annually with each of their customers and:
 - (i) mention that the customer can request access to consumption data; and
 - (ii) advise the customer of the existence of the Retailer's consumer care policy; and
 - (iii) confirm the consumer information recorded by the Retailer in accordance with clause 5 remains current.
- b) If a customer enquires about changing a pricing plan, Retailers should notify the customer of the range of Gas pricing plans and payment plans the Retailer offers.
- c) Retailers should, if they become aware that a customer's nominated alternate contact person no longer agrees to act in that capacity, inform the customer of this.

- d) Retailers should use actual meter readings for invoicing, if these are reasonably available, either through each Retailer's manual meter reading cycle or through remote meter readings. Retailers should, in the case of LPG Bottle customers, use agreed LPG Bottle prices and charges for invoicing.
- e) Retailers should prepare plain English, easy to understand Gas invoices.

8) Payment issues

- a) For customers on a monthly invoice cycle, Retailers should follow the process set out below when a customer has missed a payment, with each step occurring on or after the number of days specified from the invoice date:

Day 1: Invoice issued, allowing a minimum of 14 days for payment.

Day 14: On, or any time after day 14, if payment has not been made, the Retailer may issue a late payment notice or a reminder notice to the customer as soon as payment is overdue and start the recommended actions in clause 8 c). The late payment notice should have the purpose of engaging the customer to resolve the payment issue and avoid disconnection, and describe the actions the customer can take to avoid disconnection.

Day 21: If payment has not been made, from day 21 the Retailer should make at least three separate attempts to contact the customer via both the customer's preferred communication channel and their alternate contact person (if provided under clause 5)) for the purpose of seeking payment and avoiding disconnection (including describing the actions the customer can take to avoid disconnection). The contact attempts should ideally be at different times of the day and spread over a period of more than seven days.

Day 24: If payment has not been made, nor contact made by the customer, at or after day 24, the Retailer should use the remaining contact attempts to also discuss the customer's situation and payment options and actions to avoid disconnection. This timing allows six days for receipt of late payment notice and four days for a response.

- b) For customers on a non-monthly invoice cycle, the timing of each step above may be proportionally altered to align with the above step duration.
- c) Retailers should, for a customer not on a payment plan, who is in payment arrears and/or is having payment difficulties:
 - (i) clearly communicate its willingness to engage with the customer to resolve the payment issue by finding a suitable payment plan;
 - (ii) encourage the customer to engage with the Retailer over resolving the payment difficulties;
 - (iii) confirm the situation is not yet at the disconnection stage and the steps that the Retailer will go through to assist the customer to make payments for the supply of Gas and avoid disconnection; and
 - (iv) provide such advice (or reference to suitably qualified, independent advice) on budgeting, energy efficiency, suitable Gas tariffs available from the Retailer, and Government social and support agencies, reasonably considered to be of benefit to the customer.

- d) Retailers should work towards having the capability to reasonably monitor customers' Gas consumption via the consumption data normally collected by Retailers with the aim of helping the Retailer anticipate which customers may be about to be, or are already experiencing, payment difficulties, and proactively engage with customers based on such insight to help ensure customers receive appropriate support and advice.
- e) Retailers should, within a reasonable time of a customer falling behind in their repayments under an agreed repayment plan, contact the customer to understand the reason for non-payment, offer to review the repayment plan to align with what the customer can reasonably afford and offer to refer the customer to reputable support/social agencies offering budgeting and energy efficiency advice.

9) Disconnection

- a) Retailers should make sure they have followed the recommendations set out in clause 98) before carrying out the recommended actions in this clause 109). The recommendations in this clause 109) shall not apply in the event a Gas disconnection is required for the purpose of responding to an emergency.
- b) Subject to clause 109) c), Retailers may only commence the notification process for disconnecting a customer's premises, or disconnection and repossessing a customer's LPG Bottles, for non-payment of a Gas invoice if:
 - (i) the Retailer's invoices to the customer are overdue for payment; and:
 - (ii) ~~(1) the Retailer has made reasonable but unsuccessful attempts to engage with the customer under clause 98) to arrange payment or discuss a repayment plan (including the provision of budgeting and energy efficiency advice, as reasonably appropriate), or the customer is not adhering to an agreed debt plan that, over time, is reducing the customer's debt; or and~~
~~(2) the customer is not adhering to an agreed debt payment plan that, over time, is reducing the customer's debt; and~~
 - (iii) ~~(3) the Retailer has the contractual right to disconnect the premises; and~~
 - (iv) ~~(4) the Retailer has taken all reasonable actions to make sure the customer, or any consumer permanently or temporarily resident at the customer's premises, is not, or may not be, an MDC or an unverified MDC.~~
- c) Retailers may only commence the notification process for disconnecting a customer's premises, or disconnection and repossessing a customer's LPG Bottles:
 - (i) for non-payment of ~~a~~ a customer's estimated invoice, if, in the Retailer's reasonable opinion, the estimated reading is a reasonable estimation of actual consumption and:
 - (1) an accurate meter reading is not available due to a customer obtaining Gas in breach of the Retailer's terms and conditions; or
 - (2) the customer is denying the Retailer reasonable access to the metering installation; or
 - (3) the Retailer cannot get reasonably safe access to the metering installation, despite its reasonable efforts; and

- (4) the Retailer has taken all reasonable actions to make sure the customer, or any consumer permanently or temporarily resident at the customer's premises, is not, or may not be, an MDC or an unverified MDC; or
 - (ii) in respect of an reticulated Gas at uncontracted premises, if:
 - (1) the Retailer has reasonably satisfied itself that a consumer is unlikely to be in occupation of the premises; or
 - (2) if Gas consumption data indicates to the Retailer that a consumer is likely to be in occupation of the premises, and the Retailer has first made reasonable efforts to contact the consumer and, if applicable, the consumer's alternative contact person, about the pending disconnection; and
 - (3) the Retailer has confirmed the premises are not being switched to another Retailer (with a switch date effective at the start of the customer's occupancy); and
 - (4) ~~either the Gas meter can be safely disconnected, or the LPG Bottles can safely be disconnected and repossessed;~~ and
 - (5) the Retailer has satisfied itself, acting reasonably, that disconnection of the premises will not disconnect an MDC or an unverified MDC;
 - (iii) at a time that is not reasonably likely to endanger the wellbeing of the customer or any consumer at the premises being disconnected; or
 - (iv) if the debt due relates to Gas supply (e.g., it does not relate to electricity, telephone, broadband or other services); or
 - (v) if there is no genuine dispute between the Retailer and the customer (of which the Retailer has been notified).
- d) Before disconnecting a customer for non-payment of a Gas invoice, a Retailer must:
- (i) make reasonable attempts to inform the customer and, if applicable, the customer's alternative contact person, of the pending disconnection including using and successfully completing a traceable form of contact at least once (e.g. an electronic read/viewed receipt or courier letter requiring a signature); and
 - (ii) issue the customer with notices of disconnection, which should be provided at least 44 days after the invoice was issued; with the first notice provided at least seven days before the disconnection and the second at least 24 hours before the disconnection.
- e) For customers on a non-monthly invoice cycle, the timing of each step in clause 9) d) may be proportionally altered to align with the above step durations.
- f) Retailers should make sure that the content of any notice or final notice of disconnection for non-payment or for non-registration of any premises to which the Retailer supplies Gas, aims to engage the customer to resolve the non-payment issue by containing at least the following information:
- (i) a description of the actions the customer can take to avoid disconnection;

- (ii) the contact details necessary for payment of some, or all, of the debt;
 - (iii) payment options available (e.g., smooth pay or redirection of income);
 - (iv) details of the Retailer's dispute resolution process and the contact details of Utilities Disputes;
 - (v) details of all the charges, fees and penalties that must be paid, if disconnection and reconnection occur, in addition to charges for Gas supply;
 - (vi) the contact details of Work and Income or other support/social agencies that can help the customer to pay their Gas invoice;
 - (vii) the contact details of one or more reputable budgeting advice agencies (one of which must be funded by the Ministry of Social Development); and
 - (viii) where to obtain information on applying to have MDC status and a summary of what it means to be an MDC.
- g) Retailers should only move to disconnection of a consumer's premises, or disconnection and repossession of a consumer's LPG Bottles, for non-payment of one or more Gas invoices, as a last-resort measure.
- h) Retailers should satisfy themselves that any of their representatives who visit a consumer's premises or uncontracted premises for the purpose of contacting the consumer about the non-payment of Gas or to make a disconnection/repossession:
- (i) make a reasonable effort to contact any consumer at the premises (unless there is a health and safety risk to the representative or the customer or consumer);
 - (ii) advise the customer or consumer at the premises to contact the Retailer, including, if necessary, provide information to the consumer to help them to do this;
 - (iii) informing the customer or consumer that, if they make contact with the Retailer at any point before disconnection, the Retailer should actively work with the customer or consumer to avoid disconnection occurring, even if customer or consumer has failed to act on prior attempts by the Retailer to engage with them;
 - (iv) provide information to the customer or consumer at the premises regarding reputable support/social agencies offering budgeting and energy efficiency advice; and
 - (v) make a reasonable effort to ascertain and consider whether there are any reasons why the disconnection should be put on hold (e.g., there is, or may be, a MDC or an unverified MDC at the premises, there is a dispute in progress between the customer and the Retailer, or the customer provides reasonable evidence to show they are making genuine efforts to arrange payment of the debt).
- i) An LPG Bottle running out of LPG, is not considered a disconnection under these Guidelines. This is because the customer has understood and accepted the risks associated with being on an LPG Bottle service where disconnection effectively occurs ~~automatically once~~ when a customer's LPG Bottles are depleted to the extent that LPG will no longer discharge from the bottle.

10) Additional recommendations for medically dependent consumers

- a) Retailers should have and use processes and systems to request and record sufficient information on MDCs and unverified MDCs to make sure, as far as practicable, that no premises at which an MDC permanently or temporarily resides is disconnected, or LPG Bottles at the premises at which an MDC or unverified MDC permanently or temporarily resides, are disconnected and repossessed, for reasons of non-payment of a debt to the Retailer, or the consumer obtaining Gas services by or involving deception, and in particular:
 - (i) the Retailer should request and record information on whether a customer or consumer permanently or temporarily resident at the customer's premises:
 - (1) is potentially medically dependent; and
 - (2) is verified as medically dependent via a HP Notice completed by a health practitioner with an appropriate scope of practice; and
 - (ii) if a customer or a consumer permanently or temporarily resident at the customer's premises is or could be an MDC or unverified MDC, the Retailer should collect the following information:
 - (1) the name of the actual/unverified MDC; and
 - (2) the name of the actual/unverified MDC's GP; and/or
 - (3) where it has occurred, the name of the health practitioner with an appropriate scope of practice who has verified the customer or consumer permanently or temporarily resident at the customer's premises as medically dependent by completing a valid HP Notice; and
 - (4) where it has occurred, the date on which the valid HP Notice was issued, and any review or termination date contained in the HP Notice.
- b) Retailers should, for MDCs and unverified MDCs who are a customer of the Retailer, have and use processes and systems to request, record, allow them to access and ensure the use of information on the communication and invoicing preferences of the MDC/unverified MDC in accordance with clause 5) of these guidelines.
- c) Retailers should, for MDCs and unverified MDCs who are not a customer of the Retailer but are permanently or temporarily resident at the premises of a customer of the Retailer, have and use processes and systems to request and record information on the communication preferences of the consumer or the consumer's alternate contact person in accordance with clause 5) of these guidelines.
- d) Where an MDC who is not a customer, or an unverified MDC who is not a customer, has nominated:
 - (i) a support person, the Retailer should contact the MDC/unverified MDC directly; and
 - (ii) an alternate contact person as the primary contact, the Retailer should initially contact the MDC/unverified MDC via the alternate contact person, and only revert to contacting the MDC/unverified MDC directly if the Retailer cannot contact them via the alternate contact person.

- e) Retailers should:
- (i) seek to make sure customers are aware of and agree to the obligation (if created via the Retailer's terms and conditions) to inform the Retailer if the customer, or a consumer permanently or temporarily resident at the customer's premises, is an MDC or an unverified MDC; and
 - (ii) have a process to confirm MDCs are verified as medically dependent via a HP Notice completed by a health practitioner with an appropriate scope of practice, noting Retailers may choose to verify a customer's MDC status if the customer falls into payment arrears.
- f) If a customer or a consumer permanently or temporarily resident at the customer's premises is an MDC, Retailers should advise the customer that the supply of Gas to the premises cannot be guaranteed and that the MDC needs to develop an individual emergency response plan to use during any Gas outages.
- g) Retailers should not proactively recommend an LPG Bottle service to a customer if the customer, or a consumer permanently or temporarily resident at the customer's premises, is an MDC or an unverified MDC.
- h) Retailers may agree to providing an LPG Bottle service for the premises of an MDC or an unverified MDC if requested to do so by the customer at the premises. This is to avoid discriminating against MDCs wanting an LPG Bottle service. However, the Retailer should suggest the MDC or unverified MDC first discusses the LPG Bottle service option with their health practitioner (on the basis that a bottled LPG service shall automatically be interrupted on the LPG Bottle running out of LPG).
- i) If an LPG Bottle service is provided at premises where an MDC or unverified MDC permanently or temporarily resides, the Retailer should make sure the MDC or unverified MDC understands the risk of there being no LPG supply if the LPG Bottle runs out of LPG.
- j) Retailers should use reasonable endeavours to make sure:
- (i) they have effective and agreed processes with Gas distributors to support and prompt a Gas distributor to:
 - (1) coordinate with Retailers for a planned Gas outage or disconnection, if Retailers notify the distributors of any MDCs or unverified MDCs on the Gas distributor's network; and
 - (2) not vary the time or date of a planned electricity outage or disconnection without conferring with the Retailers whose MDC or unverified MDC customers or consumers are affected; and
 - (ii) their service level agreements with metering service providers (MSP) prevent the MSP, subject to health and safety requirements, from:
 - (1) disconnecting a Retailer's customer without the express consent of the Retailer; and
 - (2) varying the date or materially varying the time of a consented disconnection.

- k) Retailers may, at their discretion and subject to the customer's agreement, allocate the status of MDC to a customer who may be medically dependent or to the customer's premises if a consumer who permanently or temporarily resides there may be medically dependent. The Retailer's view may be based on information gathered under these guidelines, provided by an unverified MDC, the customer, a consumer permanently or temporarily resident at the customer's premises, or a third party.
- l) Retailers should make all reasonable efforts to contact, as soon as practicable, a customer, or a consumer permanently or temporarily resident at a customer's premises, who the Retailer believes could be an MDC, to obtain an application, in any form, for MDC status from the customer or consumer resident at the customer's premises.
- m) Retailers should, upon receipt of an application for MDC status from a customer or a consumer permanently or temporarily resident at the customer's premises:
 - (i) confirm the Retailer is responsible for supplying Gas services to the premises; and
 - (ii) if the Retailer is responsible for supplying Gas services to the premises:
 - (1) ask for the unverified MDC's consent to record and hold relevant information relating to the MDC application and to advise the relevant Gas distributor and MSP of relevant information (since these parties can disconnect the unverified MDC's premises); and
 - (2) put in its records the application for MDC status; and
 - (3) confirm that the unverified MDC is permanently or temporarily resident at the premises; and
 - (4) ask the unverified MDC for a valid HP Notice if one has not been provided with the application for MDC status; and
 - (5) where applicable, confirm the validity of the HP Notice held by the unverified MDC; and
 - (6) if the unverified MDC's consent has been given, advise the relevant Gas distributor and MSP of the application at the time of receipt and at the time of approval, using standard New Zealand Gas industry protocols and in compliance with all relevant law.
- n) Retailers should, if they are not the responsible retailer under the Gas Switching Rules for the premises an unverified MDC permanently or temporarily resides at:
 - (i) make reasonable attempts to determine who the current retailer is for the premises and advise the unverified MDC of the retailer's name and contact details; and
 - (ii) encourage the unverified MDC to contact the appropriate retailer as soon as practicable.
- o) Retailers may, if an unverified MDC does not provide a valid HP Notice verifying MDC status, after a period of at least 21 business days after making a request under clause 10) m) (ii)(4):

- (i) request the valid HP Notice directly from the District Health Board, private hospital, GP or health practitioner the unverified MDC says provided the HP Notice if the unverified-MDC has provided appropriate consent and contact details; or
 - (ii) if the unverified MDC has not provided appropriate consent or contact details, advise the unverified MDC they should obtain the valid HP Notice from the relevant health practitioner that issued the HP Notice as soon as practicable.
- p) Retailers should advise unverified-MDCs who do not agree to the Retailer recording and holding information relevant to the application and/or HP Notice, or who do not provide a valid HP notice within the time frame set out in clause 10) o):
 - (i) that the Retailer may not treat the unverified-MDC as an MDC/unverified MDC; and
 - (ii) that the unverified-MDC should, as soon as practicable, inform the relevant health practitioner that the retailer may not treat the unverified-MDC as an MDC/unverified-MDC.
- q) Retailers should advise an unverified-MDC that their application has not been approved if, within a period of at least 21 business days of a Retailer making a request, the unverified MDC does not respond to queries from the Retailer sent via the agreed method of communication between the Retailer and the unverified MDC.
- r) Retailers should, if the HP Notice for a customer, or a consumer permanently or temporarily resident at the customer's premises, is not current or is potentially invalid, have and follow a process to review and confirm the MDC status of the customer or consumer resident at the customer's premises.
- s) Retailers may choose to confirm the validity of a HP Notice verifying a customer or a consumer permanently or temporarily resident at the customer's premises as medically dependent. This should be no more frequently than once every 12 months unless the HP Notice is valid for less than 12 months or has no expiry date on its validity or the Retailer, acting reasonably, has good reason to believe an MDC should not have MDC status.
- t) Retailers should explain to an unverified MDC that the unverified MDC and Retailer each pay their own costs associated with the unverified MDC gaining MDC status, unless a Retailer wishes while an HP notice remains in force to confirm or reconsider the MDC status of a customer, or a consumer permanently or temporarily resident at a customer's premises. In that case, the Retailer should reimburse the customer or consumer resident at the customer's premises for the reasonable costs incurred if the Retailer confirms the customer's or consumer resident at the customer's premises MDC status.
- u) Retailers that do not agree an MDC or an unverified MDC is medically dependent should inform the MDC/unverified MDC of the Retailer's view and:
 - (i) advise the MDC/MDC applicant of the dispute process the MDC/unverified MDC may follow, including:
 - (1) making a complaint to the Retailer through the Retailer's dispute resolution process; and

- (2) making a complaint to Utilities Disputes if the MDC/unverified MDC considers its dispute remains unresolved following the conclusion of the Retailer's dispute resolution process; and
 - (ii) if a complaint is made, treat the premises where the MDC/unverified MDC permanently or temporarily resides as housing an MDC for at least the duration of the dispute concerning the MDC's/unverified MDC's status as an MDC.
- v) Retailers should:
- (i) make all reasonable efforts to confirm whether an MDC or unverified MDC is permanently or temporarily resident at a customer's premises which the Retailer intends to disconnect; and
 - (ii) not disconnect a post-pay Gas customer's premises for non-payment of debt even where Gas supply services were obtained by deceptive means if an MDC or unverified MDC is permanently or temporarily resident at the premises, including where the customer or consumer permanently or temporarily resident at the customer's premises:
 - (1) has been confirmed as medically dependent by the Retailer; and
 - (2) has applied to the Retailer for MDC status.
- w) Retailers should use reasonable endeavours to make sure they have effective and agreed processes with Gas distributors to support and prompt a Gas distributor undertaking a disconnection of a domestic premises in an emergency, if practicable, safe and if there is sufficient time, to proceed with the disconnection only if:
- (i) no consumers are at the premises or the distributor receives no response to its reasonable attempts to contact persons at the premises during the distributor's onsite visit(s); and
 - (ii) the distributor has advised any MDCs at the premises of the reason for the disconnection and has advised any such MDCs to enact their individual emergency response plan.

11) Reconnection

- a) Retailers that disconnect Gas at a customer's premises or disconnect and repossess LPG bottles from a customer's premises should reconnect Gas to those premises or resupply and reconnect LPG Bottles to those premises as soon as reasonably practicable, if:
 - (i) the disconnection or repossession was inadvertent or in breach of the Retailer's terms and conditions (in which case the reconnections shall be at no cost to the customer); or
 - (ii) the disconnection or repossession was for either non-payment of debt or a material breach of the Retailer's conditions for supply of Gas, and the customer has satisfied the Retailer's (reasonable) requirements for reconnection/resupply.
- b) Remote Gas reconnections should only occur if the Retailer can reasonably satisfy itself that the reconnection can be completed safely.
- c) A Retailer should, within a reasonable period, revisit support options with a customer that remains disconnected and remains contracted to that Retailer.

12) Fees and bonds

- a) Retailers should, in their consumer care policy, provide easy-to-understand detailed information on all fees, charges (including disconnection and reconnection charges), conditional discounts and bonds charged or made available to customers, even if the Retailer has published them elsewhere on its website.
- b) Retailers should make sure all customer fees, charges, conditional discounts and bonds are reasonable. Bonds should be returned within a reasonable time.
- c) Retailers should consider the Commerce Commission's guidance on unfair contract terms, including regarding break fees, under the Fair Trading Act 1986. Retailers must also make sure that they do not, using break fees or any other fees, act in a manner inconsistent with Gas Industry Company's Saves and Winbacks Guidelines.

13) Information disclosure and monitoring

- a) Retailers should provide to Gas Industry Company such information as is reasonably requested by Gas Industry Company to assess compliance with these Gas Consumer Care Guidelines.
- b) Gas Industry Company will advise a Retailer of any non-compliance with the Gas Consumer Care Guidelines identified by Gas Industry Company. The Retailer will work reasonably with Gas Industry Company to remedy any non-compliance.
- c) Gas Industry Company may publish the details (including Retailer names) of any identified non-compliance with the Gas Consumer Care Guidelines.

Gas Consumer Care Guidelines Guidance Notes

1. These Guidance Notes are designed to support Gas Industry Company's Gas Consumer Care Guidelines, to help Retailers comply with the Gas Consumer Care Guidelines.
2. The focus of these Guidelines is to help natural gas and LPG (Gas) retailers to understand the context and goals of the Gas Consumer Care Guidelines, and to support a meaningful increase in protection for vulnerable Gas consumers, consistent with changes made in the electricity market.
3. The following table summarises the scope of the Gas Consumer Care Guidelines:

The Gas Consumer Care Guidelines apply to the following Gas market participants				
Natural Gas Retailer	LPG Retailer (45kg bottles)	LPG retailer (reticulated)	Distributor (Natural Gas)	Distributor (LPG)
✓	✓	✓	✗	✗

The Gas Consumer Care Guidelines apply to the following Gas market consumers		
Residential	Small business	Commercial & industrial
✓	✗	✗

4. The Gas Consumer Care Guidelines are closely aligned with the EA's Electricity Consumer Care Guidelines, to help deliver consistency and efficiency across electricity and Gas markets.
5. The Gas Consumer Care Guidelines should be interpreted with common-sense, giving words their plain English meaning, and having regard to the intent of the Gas Consumer Care Guidelines.
6. Gas Retailers that also supply electricity to customers will be familiar with the Electricity Consumer Care Guidelines and will be implementing measures to ensure alignment with the Electricity Consumer Care Guidelines. Extending equivalent alignment measures to Gas customers will ensure compliance with Gas Consumer Care Guidelines.
7. Gas Retailers that do not also supply electricity to customers (Stand-alone Gas Retailers) will be less familiar with the EA's Electricity Consumer Care Guidelines and may have less well-developed consumer care systems in place. Acknowledging the more nascent state of Stand-alone Gas Retailers' consumer care systems, Stand-alone Gas retailers be given an extended period for implementing the Gas Consumer Care Guidelines, as reflected in clause 12 below
8. Compliance by Retailers with the Gas Consumer Care Guidelines is voluntary but compliance with the Gas Consumer Care Guidelines does not absolve participants of any other legal or contractual obligation to Gas consumers.
9. The Gas Consumer Care Guidelines are deliberately non-prescriptive. This non-prescriptive approach is intended to provide a framework within which participants can innovate.

10. If Retailers are unsure about anything relating to the Gas Consumer Care Guidelines they can discuss the same with Gas Industry Company.

Alignment timing

11. Gas Industry Company will survey Gas Retailers that also supply electricity to customers 12 months after publishing the Gas Consumer Care Guidelines, to monitor compliance. Regulatory change recommendations will be considered if this voluntary compliance approach proves unsuccessful.
12. Gas Industry Company will survey Gas Retailers that do not also supply electricity to customers (Stand-alone Gas Retailers) 24 months after publishing the Gas Consumer Care Guidelines, to monitor compliance. Regulatory change recommendations will be considered if this voluntary compliance approach proves unsuccessful.



Appendix B – Submissions Summary

Question	Submission
Nova	
Do you agree with the changes made to the Gas Consumer Care Guidelines to address persons medically dependent on gas?	<ul style="list-style-type: none"> Nova questions whether or not there are actually circumstances in which customers are medically dependent on gas? If such circumstances exist, Nova will respect the guidelines.
Do you support the development of new Gas Information Exchange Protocols, adopting relevant provisions from the corresponding information exchange protocols in the electricity market, addressing the exchange of MDC information?	<ul style="list-style-type: none"> Nova does not support the development of new Gas Information Exchange Protocols until it can be shown that customers can be medically dependent on gas.
FinCap	
Do you agree with the changes made to the Gas Consumer Care Guidelines to address persons medically dependent on gas?	<ul style="list-style-type: none"> FinCap strongly supports the changes made that make protections for people medically dependent on gas consistent with their protections for electricity supply. Such protections can prevent avoidable death that can cause significant harm to communities. Preventing harm in the first place is the best way to address the avoidable hardship which financial mentors support people through every day.
Do you support the development of new Gas Information Exchange Protocols, adopting relevant provisions from the corresponding information exchange protocols in the electricity market, addressing the exchange of MDC information?	<ul style="list-style-type: none"> We support development of exchange protocols that ensure a medically dependent consumer remains protected where a customer changes providers or where multiple entities ensure supply but only one has a relationship with the end user. Whenever a supplier is in doubt, protections should apply until a point where whether or not there is a medically dependent consumer is clearly known. This will help avoid an unacceptable tragedy where a medically dependent consumer is put in an avoidable life-threatening situation. There has been extensive work in Australia on life support protections that reach across multiple businesses who are ensuring stable supply. To get a head start on what

Question	Submission
	<p>considerations may be relevant here we encourage the GIC to discuss this work with the Essential Service Commission, Australian Energy Market Commission and Australian Energy Regulator. We also support the calls of many stakeholders for the Ministry of Health to become more involved in facilitating a robust system for protecting people medically dependent on energy supply.</p>
UDL	
Do you agree with the changes made to the Gas Consumer Care Guidelines to address persons medically dependent on gas?	-
Do you support the development of new Gas Information Exchange Protocols, adopting relevant provisions from the corresponding information exchange protocols in the electricity market, addressing the exchange of MDC information?	-
Vector	
Do you agree with the changes made to the Gas Consumer Care Guidelines to address persons medically dependent on gas?	<ul style="list-style-type: none"> • Vector has always broadly supported the extension of the electricity Consumer Care Guidelines to the gas sector. • In the case of the changes made to the draft Gas Consumer Care Guidelines to address medically dependent consumers (MDC), we seek clarity whether consumers can be "medically dependent" on LPG, i.e. whether there is life support equipment that may be fuelled by LPG as defined by New Zealand and Australian rules/regulations. We note that the newly added section 10 of the draft Consumer Care Guidelines provides the following additional/specific protections for 45kg bottled LPG consumers: <ul style="list-style-type: none"> g) <i>Retailers should not proactively recommend an LPG Bottle service to a customer if the customer, or a consumer permanently or temporarily resident at the customer's premises, is an MDC or an unverified MDC.</i> h) <i>Retailers may agree to providing an LPG Bottle service for the premises of an MDC or an unverified MDC if requested to do so by the customer at the premises. This is to avoid discriminating against MDCs wanting an LPG Bottle service. However, the Retailer should suggest the MDC or unverified MDC first discusses the LPG Bottle</i>

Question	Submission
	<p><i>service option with their health practitioner (on the basis that a bottled LPG service shall automatically be interrupted on the LPG Bottle running out of LPG).</i></p> <ul style="list-style-type: none"> In relation to the last sentence of clause "h)" above, should the GIC determine that there is no known LPG powered life support equipment, we suggest removing the requirement for the MDC or unverified MDC to discuss an LPG Bottle service option with his or her health practitioner – which will no longer apply, e.g. both "g)" and "h)" above. In addition, we do not agree that a bottled LPG service is "automatically...interrupted", which suggests that this service is interrupted all the time, which is not the case. We therefore suggest amending clause "h)", as follows: <ul style="list-style-type: none"> <i>h) Retailers may agree to providing an LPG Bottle service for the premises of an MDC or an unverified MDC if requested to do so by the customer at the premises. This is to avoid discriminating against MDCs wanting an LPG Bottle service. However, the Retailer should suggest the MDC or unverified MDC first discusses the LPG Bottle service option with their health practitioner (on the basis that a bottled LPG service shall automatically be interrupted on the LPG Bottle running out of LPG).</i> We are not aware of any list of MDCs of gas fueled retailers. We seek clarity on how gas retailers – particularly standalone retailers – can know who are medically dependent, and the privacy implications of handling MDC data that is provided by other parties. It is the current practice of our OnGas LPG business to treat any customer who is a pensioner as a vulnerable customer. We do not cut off supply to our pensioner customers or send them to debt collection.
<p>Do you support the development of new Gas Information Exchange Protocols, adopting relevant provisions from the corresponding information exchange protocols in the electricity market, addressing the exchange of MDC information?</p>	<ul style="list-style-type: none"> Vector seeks clarity around the applicability of Gas Information Exchange Protocols (GIEP) for the exchange of MDC information in the case of 45kg bottled LPG and reticulated LPG. We currently cannot see any practical examples for such information exchange, given there is no LPG customer register and registry processes through which MDC information (or any information for that matter) may be exchanged. There is effectively no switching in the case of reticulated LPG that would trigger the need for information exchange. A reticulated LPG customer who switches providers

Question	Submission
	<p>needs to be 'physically disconnected' from one reticulated network and 'physically connected' to another.</p> <ul style="list-style-type: none"> We seek explicit clarification whether 45kg bottled LPG and reticulated LPG services will be captured should Gas Industry Co develop any new GIEPs for MDC information. Should that be the case, we suggest that guidance on how the GIEPs apply in practice be included in the proposed consumer care policy template. We further suggest that any proposed (new) GIEPs and the draft consumer care policy template be subject to stakeholder consultation.
FirstGas	
<p>Do you agree with the changes made to the Gas Consumer Care Guidelines to address persons medically dependent on gas?</p>	<ul style="list-style-type: none"> FirstGas's distribution business and Rockgas agree that we need to protect our medically dependent and vulnerable consumers in New Zealand. As a business, we work hard to care for all customers, and support additional measures being put in place to support those most at need. However, Rockgas has several concerns regarding the current draft guidelines. The document appears to have been written from a position of piped natural gas, with limited consideration of the additional complexities of supplying LPG cylinders. LPG cylinder supply requires a person to physically attend consumers sites, and while consideration for the vulnerable person is critical, limited attention has been given to those attending the site providing this service or site safety. Furthermore, we are concerned that emergency response has been de-prioritised in the guidelines, with the expectations drafted prioritising communicating with impacted persons prior to isolating a site. Adding additional complexity to any emergency response process increases risk to emergency services and all in proximity. It is critical to consider whether LPG actually fuels life support equipment, and whether interruption of energy supply would cause immediate threat of loss of life. Therefore, Rockgas believes emergency response must be prioritised in the guidelines, with subsequent priority of returning urgent supply to vulnerable customers.

Question	Submission
	<ul style="list-style-type: none"> • FirstGas disagree that replication of medical dependency guidelines with that of the electricity market is relevant or required for natural gas / LPG consumers. • What constitutes being medically reliant on natural gas hot water or heating appliances? We query whether hot water or heating are considered an appliance required for a medical dependency in the current electricity guidelines.
Do you support the development of new Gas Information Exchange Protocols, adopting relevant provisions from the corresponding information exchange protocols in the electricity market, addressing the exchange of MDC information?	-



Appendix C – Additional Submissions Summary and Gas Industry

Submitter	Additional Submissions	Gas Industry Co Comments
FinCap	<ul style="list-style-type: none"> FinCap reiterates prior submissions already considered by Gas Industry Co. FinCap strongly recommends that at a minimum the protections for access to gas for whānau match the protections for electricity. Consistency will mean financial mentors and the whānau they support have better chances of realising good outcomes where facing issues with any essential energy supply. We resubmit the recommendations we made in an earlier submission and welcome where the GIC has accepted those recommendations while reiterating our concerns where the Proposed Guidelines still fall short of alignment with equivalent protections for electricity services. <ul style="list-style-type: none"> <i>Recommendation: The Gas Consumer Care Guidelines prompt retailers to include discussions around options for disconnecting from gas or changing the use of energy appliances in discussions around the best pricing plans or approaches to energy efficiency.</i> <i>Recommendation: The Gas Consumer Care Guidelines better match the Electricity Authority's Consumer Care Guidelines, particularly in relation to situations where whānau have missed a payment, face disconnection or seek reconnection.</i> <i>Recommendation: The Gas Consumer Care Guidelines are mandatory requirements and gas suppliers are expected to prove alignment by 31 December 2021.</i> 	<ul style="list-style-type: none"> These issues raised by FinCap were addressed in Gas Industry Co's Extending the Electricity Price Review's Final Recommendations to the Gas Market – Final Gas Market Guidelines paper dated 9 November 2021.

Submitter	Additional Submissions	Gas Industry Co Comments
	<ul style="list-style-type: none"> ○ <i>Recommendation: More work is done to ensure whānau can know they are paying fair prices for gas and identify if it is in their best interests to change providers or plans.</i> ○ <i>Recommendation: Utilities Disputes Limited is promoted to all whānau with gas supply as consistent with the requirements on electricity providers.</i> ○ <i>Recommendation: Mandatory prohibitions on saves and winbacks that mirror the prohibition for electricity providers are implemented.</i> 	
UDL		
	<p>Raising Awareness of Utilities Disputes</p> <ul style="list-style-type: none"> • 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. <p>Consumer Care Guidelines</p> <ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • Whilst Gas Industry Co considers that the substance of the EA's CCGs have been transferred to the Gas Consumer Care Guidelines, it acknowledges that explicitly adding the requirement that a traceable form of contact must be made prior to disconnection is a reasonable and prudent measure to ensure vulnerable customers are informed about a pending disconnection. • Gas Industry Co has made an amendment to the Gas Consumer Care Guidelines to reflect this new requirement.

Submitter	Additional Submissions	Gas Industry Co Comments
	<p>traceable form of contact at least once before disconnecting a customer's premises for non-payment.</p> <ul style="list-style-type: none"> 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. 	
Vector		
	<ul style="list-style-type: none"> Vector supports the development of Consumer Care Policy template based on ERANZ model. Vector reiterates its significant reservations about the proposal to add 45kg LPG pricing to Powerswitch, which would only increase the regulatory burden without any significant consumer benefits. Building a highly complex website functionality for this purpose, including maintaining it and keeping information up to date (through regular updates from LPG retailers) would be very costly. Any functionality of lesser capability would only add to the costs of bottled LPG without significant consumer benefit. Vector suggest that any new/additional compliance costs for LPG retailers arising from this proposed requirement be factored into Gas Industry Co's assessment. While electrification is expected to intensify, the use of gas is expected to decline as the energy sector transitions into a low carbon future. In considering any new arrangements, we urge Gas Industry Co to focus on enabling participants to navigate the transition smoothly rather than imposing more prescriptive arrangements that increase costs without overriding consumer benefits, therefore diminishing energy affordability. 	<ul style="list-style-type: none"> Gas Industry Co is awaiting development of costing and complexity details to enable it to carry out a cost benefit analysis of the proposal to add 45kg LPG pricing to Powerswitch.

Submitter	Additional Submissions		Gas Industry Co Comments	
FirstGas				
	<p>Application to gas distribution businesses</p> <ul style="list-style-type: none"> Disconnections for non-payment or vacancy are currently managed by the meter owner as the disconnections occur at the meter. Has input been received/ sought from meter owners on this matter? <p>Use of voluntary guidelines</p> <ul style="list-style-type: none"> FirstGas has strong concerns with how the GIC has signalled that it will monitor compliance with these voluntary guidelines. For example, the GIC may publish details including a retailer's name for non-compliance with these drafted guidelines. Compliance is not possible when the guidelines are established as voluntary. Rather the focus should be alignment with the guidelines. As stated in the guidelines, it is deliberately non-prescriptive and is intended to provide only a framework within which participants can innovate. This provides retailers with the license to interpret, (without providing clarity or concise language) while allowing innovation. This will enable multiple ways of implementing the guidelines and therefore, "compliance" in this case will become relative and subject to interpretation If the GIC are seeking compliance, then a voluntary guideline is not the correct tool to achieve this outcome. 		<ul style="list-style-type: none"> Gas Industry Co has consulted widely on these guidelines. It has received submissions from Vector and Powerco, both gas market metering service providers. Gas Industry Co disagrees with the FirstGas submission in respect of the voluntary nature of the guidelines – "compliance" with <i>voluntary</i>, and <i>non-prescriptive</i> guidelines, is possible. Measuring compliance with non-prescriptive guidelines will involve a level of subjective interpretation by Gas Industry Co, however it is expected that any uncertainty this might create will be more than offset by the flexibility the non-prescriptive guideline approach will afford to retailers in developing compliance or alignment strategies. 	
	2.3.1	Medically required refrigeration - Is this relevant for Natural Gas or LPG? This may be an issue for MDCs	2.3.1	Yes – gas refrigeration is one of the items of equipment that may form part of a MDC's critical care regime. Note however that the proposed Gas

Submitter	Additional Submissions		Gas Industry Co Comments	
		residing in caravans or campers as their fridges are frequently run-on smaller LPG Cylinders.		Consumer Care Guidelines apply only in respect of customers of 45kg LPG bottles (and not 9kg or other smaller sized bottles).
	2.3.3	<p>Gas Industry Company has however amended the Gas Consumer Care Guidelines to reflect the approach taken in the EA CCGs- Referencing retailers working towards having the capability to monitor individual customer consumption to help them anticipate which customers may benefit from assistance.</p> <p>Gas Industry Co's response does not appear to have considered cylinders, only piped gas.</p>	2.3.3	Gas Industry Co acknowledges the complexities around managing 45kg LPG bottle consumption data but considers that the current "working towards" wording in the guidelines affords enough flexibility to address the inherent difficulties in monitoring bottled LPG usage.
	2.4	<p>Gas Industry Company will survey Gas Retailers that also supply electricity to consumers 12 months after publishing the Gas Consumer Care Guidelines, to monitor compliance. Regulatory change recommendations will be considered if this voluntary compliance approach proves unsuccessful.</p> <p>Which category would Rockgas fall into, we have an enduring collaborative marketing relationship with Contact Energy. Rockgas and Contact Energy have dual branded, dual energy offerings in the market? However, we are separately owned companies.</p>	2.4	The guidelines apply to "retailers" – that is, the entity with the relevant retailer contract with the customer. If an LPG retailer (being the retailer with a contract to provide LPG services to a customer) does not also supply electricity to customers, then that LPG retailer will be subject to the Gas Industry Co's 24-month survey process.
	2.6	<p>Are any modifications required to the Gas Consumer Care Guidelines to take account of the unique characteristics of the bottled LPG market? No Significant issues were raised by submitters.</p> <p>We disagree with this as there is significant issue with guaranteed supply. We deliver cylinders. A cylinder may</p>	2.6	The guidelines address the issue of 45kg LPG bottles running out of LPG – see clause 9)i) of the guidelines which provides that a 45kg LPG bottle running out of LPG, is not considered a disconnection under the guidelines.

Submitter	Additional Submissions		Gas Industry Co Comments	
		run out and supply is ceased. This is beyond the retailer's control if no order has been placed.		
	2.7	<p>Those using less than 10 terajoules of gas per year.</p> <p>Could this measurement reference be changed to something more reflective of industry typical measurement types? Terajoules is more commonly used in the Electricity sector.</p>	2.7	To clarify - the "10 terajoule" reference is made in connection with the Retail Gas Contracts Oversight Scheme that was introduced by Gas Industry Co in 2010 with the aim of delivering improved outcomes for <i>small</i> gas consumers - those using less than 10 terajoules of gas per year. (Terajoules being the relevant unit of measurement for the gas industry – refer to the Gas (Downstream Reconciliation) Rules 2008, and 10 terajoules being a relatively small volume of gas.)
	3.3	<p>Utilities Disputes and Powerswitch Guidelines – these guidelines recommend retailers continue to provide retail natural gas pricing information to Powerswitch and Gas Industry Company is reviewing the addition of adding 45kg LPG bottle pricing to Powerswitch.</p> <p>Rockgas would like to reiterate our concerns about extending this requirement to LPG cylinder business, unlike electricity or piped gas, selecting a preferred retailer does not ensure that retailer can supply a premise. Engaging a particular retailer to service your property would be subject to a site check, a retailer may be unable to supply a premise due to delivery health and safety concerns, compliance issues or delivery access issues.</p>	3.3	Noted. Gas Industry Co acknowledges that posting pricing information on PowerSwitch is not a guarantee to supply any particular residential address.

Submitter	Additional Submissions		Gas Industry Co Comments	
	3.4	<p>Do you agree with the Gas Industry Companies proposed narrower approach than implemented in the electricity market in relation to the provision of Utilities Disputes information?</p> <p>Yes, however Rockgas believes it should be narrowed to include only billing, complaints, term or condition changes, website and price changes communications.</p>	3.4	Noted. Gas Industry Co does not however agree to limit the definition of "complaints" to include only billing, complaints, term or condition changes, website and price changes communications. The revised definition is consistent with the definition of "complaint" in the UDL scheme rules.
	3.6	<p>Gas Industry Company Investigating the associated costs and implementation complexities of adding LPG pricing (45kg bottles supplied to residential consumers) to Powerswitch. The timing and implementation of Powerswitch provisions of the Utilities Disputes and Powerswitch Guidelines to 45kg LPG retailers awaits completion of this work.</p> <p>Rockgas is unable to offer full support of points 3.5 and 3.6 as they ask for agreement to support proposed implementation timelines while the complexities associated with Powerswitch are unresolved. Rockgas requests the opportunity to revisit once the associated costs and complexities of adding LPG cylinders has been consulted on, agreed to, or finalised.</p>	3.6	Noted. Gas Industry Co is awaiting development of costing and complexity details to enable it to carry out a cost benefit analysis of the proposal to add 45kg LPG pricing to Powerswitch.
	Appendix A	<p>Alternate Contact Person. The alternate contact person must be independent of the retailer. Would be better phrased as "should" rather than must. Or further clarification of "independent of retailer" is required.</p>	Appendix A	Noted. Gas industry Co considers the terms "should" and "must" to be synonymous.
	Appendix A	<p>Customer means a person who has entered into a contract with a retailer for supply..... If a consumer is without a contract to a retailer are they not a customer?</p>	Appendix A	No – customers must have a contract with their retailer.

Submitter	Additional Submissions		Gas Industry Co Comments	
	Appendix A	<p>"LPG Bottle" means 45 kg LPG Bottle.</p> <p>Is the intention of the Consumer Care Guidelines to exclude residential customers using alternative sized cylinders from the care model? LPG refrigeration and heating is commonplace in caravans and motor homes. Rockgas does also supply alternative sized cylinders to some permanent residential dwellings. Rockgas believes that some MDC and vulnerable customers are using alternative sized LPG cylinders to supply residential gas.</p>	Appendix A	Correct – Gas Industry Co has limited the guidelines to 45kg LPG bottles, to help limit the complexity of introducing these guidelines to the bottled LPG market.
	Appendix A	<p>"LPG Retailer" Means any person who supplies LPG to a customer by reticulated distribution or in LPG Bottles.</p> <p>If the intention of the Consumer Care Guidelines is not to exclude some residential consumers, then LPG Retailer may be extended to 3rd party resellers including service stations, Hardware stores and any bottle swap site</p>	Appendix A	"LPG Bottles" are defined in the guidelines as 45kg LPG bottles. The guidelines apply to all retailers selling these 45kg LPG bottles to consumers for residential use.
	Appendix A	<p>Gas Distributor Has not been specified in appendix, first appears at page 31. Further clarification is required.</p>	Appendix A	Noted. Gas Industry Co has added a definition of Gas distributor to the guidelines.
	Appendix A	<p>While Medically Dependent Consumer is defined, Vulnerable Gas consumers is not? There is no further clarification within the Gas Consumer Care Guidelines what constitutes a Vulnerable Gas consumer. While expectations are placed on retailers to adhere to the guidelines and there are possible penalties associated with non-compliance Rockgas believe further clarification or criteria is required to support retailers successfully implementing guidelines.</p>	Appendix A	Consistent with the EA's CCGs, there is no definition of "vulnerable consumer" in the guidelines. The guidelines however are intended to provide additional protections for consumers who are vulnerable, by virtue of being either medically dependent or by having difficulty making payment on their energy bills.

Submitter	Additional Submissions	Gas Industry Co Comments
	<p>Appendix A</p> <p>"Uncontracted premises" means a residential premise that a Retailer is supplying Gas to, without a current Retail supply contract. Rockgas has been unable to establish the impact to retailer within the care guidelines? Residential customers are currently uncontracted.</p>	<p>Appendix A</p> <p>The disconnection of "uncontracted premises" is addressed in clause (9 (c of the guidelines. Gas Industry Co has amended the provisions in clause (9 (c to remove references to premises with 45kg bottled LPG installations as Gas Industry Co considers that the concept of an "uncontracted premise" is not relevant to premises with bottled LPG installations. (To clarify, the concept of an uncontracted premise is created to regulate the disconnection process for premises at which the prior retailer may have residual liability to third party providers (such as distributors and metering service providers) for the continued provision of services to a premise, even though the retailer has no current customer contract at that premise, against which it can recover those third party costs.)</p>
	<p>3)(2)a) & 3)(3)</p> <p>Customers facing difficulties paying for Gas supply should be supported by their Retailer, including by helping preventing customers accumulating debt over Gas supply. Next point.... Retailers will seek to keep customers connected, avoiding disconnection for an unpaid Gas invoice. Rockgas believes proposed limitations to processes and the requirements to avoid disconnection do not align or support the requirement of 3)a)(2)(b)</p>	<p>3)(2)a) & 3)(3)</p> <p>The guidelines seek to balance the objective of ensuring customers remain connected to an energy service, to ensure they can continue to enjoy the wellbeing benefits the energy service provides, against the objective of managing a customer's debt levels incurred through consuming that energy service. Gas Industry Co is happy with the balance that has been struck.</p>

Submitter	Additional Submissions		Gas Industry Co Comments	
	5)a) & b)	<p>Retailers should have and use processes and systems to request, record, allow them to access and ensure that they use information on customers' communication preferences (communication type and method, timing and language)</p> <p>This is unreasonable as most second tier retailers will not have the infrastructure to administer this guideline. It would add undue complexity and cost. Further clarification sought: is the expectation that retailers will supply records relating to consumer care in languages other than New Zealand's official languages?</p>	5)a) & b)	<p>Gas industry Co is aware that some 45kg bottle LPG retailers will not currently have these customer service systems in place. Gas Industry Co has provided these retailers with an additional 12 months' lead time (24 months in total) for implementation of the systems necessary to comply with the guidelines. Gas Industry Co also considers that there is sufficient flexibility in the language of the guidelines to accommodate individual retailers' processes. Finally, there is no requirement in the guidelines to produce a consumer care policy in languages other than New Zealand's official languages, but a retailer may choose to do that depending on the make-up of its customer base.</p>
	6)	<p>When a customer signs up to or is denied a contract.</p> <p>This section makes no allowance or reference to non-compliant or unsafe sites, retailers should not be required by the Consumer Care Guidelines to supply unsafe sites or hazardous sites.</p>	6)	<p>The guidelines establish a set of minimum standards, they do not prescribe all aspects of the connection process. The guidelines do not prevent a retailer from refusing to supply an unsafe site. Clause 6g) only requires the retailer to inform the customer of the reason for non-supply.</p>
	8) d)	<p>Retailers should work towards having the capability to reasonably monitor customers Gas consumption data</p>	8) d)	<p>Noted but Gas industry Co considers that the provisions as drafted are adequate. Gas Industry</p>

Submitter	Additional Submissions		Gas Industry Co Comments	
		<p>normally collected by retailers with the aim of helping the retailer anticipate which customers may be about to be, or are already payment difficulties, and proactively engage with customers based on such insight to help ensure customers receive appropriate support and advice.</p> <p>With LPG customers, this is not achievable as there is currently no adequate technology or systems to monitor LPG consumption. Customer usage does not adequately predict a consumer's ability to pay their bills, is it [not] reasonable to expect retailers to apply analytics to anticipate which customers may experience difficulties paying.</p>		<p>Co understands that much of the 45kg LPG bottle market operates on an invoice in arrears basis. Retailers will, we assume, be aware, when a request to replace an empty bottle is received, whether or not the customer has unpaid debt relating to the prior bottle(s). Non-payment or late payment on prior invoices might suggest payment difficulties for the customer.</p>
	9) c) ii) (3)	<p>The Retailer has confirmed the premises are not being switched to another Retailer (applies to Repossession/collection of LPG Cylinders)</p> <p>There is no LPG national register and therefore not possible to check if a site is currently in the "switching process" for LPG market.</p>	9) c) ii) (3)	<p>Noted. Gas Industry Co has amended clause 9)c)ii)2) and 3) to make it clear these provisions do not apply to 45kg LPG bottles.</p>
	10) g)	<p>Retailers should not proactively recommend an LPG Bottle service to a customer if the customer, or a consumer permanently or temporarily resident at a customer's premise, is an MDC or an unverified MDC.</p> <p>While Rockgas supports the premise and agrees it would provide the best certainty of supply for Medically Dependant Consumers, further clarification would be beneficial. Is the expectation that any MDC being supplied opposition cylinders to a residence with access to a reticulated gas network should be referred to the reticulated gas retailer?</p>	10) g)	<p>The requirement in the guidelines is to not "proactively" recommend an LPG bottle service to a MDC. However, a MDC is free to request such a service, and a retailer free to supply the same in response to a request, subject to the recommendations in the guidelines.</p>

Submitter	Additional Submissions		Gas Industry Co Comments	
	10) j) ii)	Metering service provider is not specified in Appendix A, is this intended to reflect a 3rd party contractor of an LPG Distributor?	10) j) ii)	The reference to "metering service provider" is to the person that provides the metering service to a Gas retailer (either under contract with a third-party metering service provider or by an in-house arrangement, within the retailer's business). Gas Industry Co has added definition to the guidelines.
	10) o)	Retailers may, if an unverified MDC does not provide a valid HP Notice verifying MDC status, after a period of at least 21 business days after under clause 10) m) (ii) (4)..... 10) m) (ii) (4) and ... (5) states "ask the unverified MDC for a valid HP Notice if one has not been provided with the application for MDC status and (5) Where applicable, confirm the validity of the HP Notice held by the unverified MDC. How can Retailers confirm the validity of the HP Notice, due to Privacy Act	10) o)	The template notice contains an approval from the MDC for the MDC's health practitioner to share information on the MDC's dependence on the medical equipment, with the retailer and the relevant distribution and metering service provider companies.
	10) o) i)	Request the valid HP notice directly from the District Health Board, private hospital, GP or Health practitioner the unverified MDC says provided the HP Notice if the unverified MDC has provided appropriate consent and contact details. Rockgas believes this to be an unreasonable request and a significant risk for reportable privacy breaches. How are retailers to predict what is an appropriate level of consent, in an appropriate format for each of the above-mentioned providers. Confirmation to release information is normally approved with the agent	10) o) i)	The template MDC Notice (attached in appendix D) form will contain the necessary consents/authorisations to share information about the MDC.

Submitter	Additional Submissions		Gas Industry Co Comments	
		releasing the information in this case the medical provider rather than the enquirer being Gas provider.		
	10) p) i) & ii)	<p>The Retailer may not treat the unverified MDC as an MDC/unverified MDC; and that the unverified-MDC should, as soon as practicable, inform the relevant health practitioner that the retailer may not treat the unverified-MDC as an MDC/unverified-MDC</p> <p>Further clarification is required - is the intention of this section is for the retailer to supply a specified time frame to supply HP or retailer will cease treating the customer as either a MDC or an unverified MDC</p>	10) p) i) & ii)	The guidelines do not prescribe any time requirements by which a retailer may provide notification to a person claiming MDC status, who has failed to provide the MDC Notice or authorise its recording in the retailer's system. However, in the interim, the consumer will have the status of an unverified MDC and therefore won't be disconnected until the application process is complete. The applicant will be treated as an MDC for the duration of any dispute around MDC status.
	10) w)	Retailers should use reasonable endeavours to make sure they have effective and agreed processes with Gas distributors to support and prompt a Gas Distributer undertaking a disconnection of a domestic premise in an emergency, if practicable and there is sufficient time, to proceed with the disconnection only if.. no consumers are at the premises or the distributor receives no response to its reasonable attempts to contact person at the premises during the distributors onsite visit(s); and.... the distributor has advised any MDCs at the premises of the reason for the disconnection and has advised any such MDCs to enact their individual emergency response plan,....	10) w)	Noted. Gas industry Co has amended the clause to read "if practicable, safe and there is sufficient time, to proceed with the disconnection only..."

Submitter	Additional Submissions	Gas Industry Co Comments	
	<p>Unlike Electricity, Gas is a hazardous and a highly flammable substance, time is always of the essence and to add further complexity to Emergency Response plans creates unnecessary additional risk. Rockgas believes following the guidance above would increase risk to all parties and attending emergency services. It is vital to recognise that there is no life support equipment i.e.. dialysis machine, respirator or ventilator that are powered by LPG. For the safety of all, Rockgas suggests a safer option in case of an emergency would be "once site/area has been deemed safe, the retailer should contact any impacted MDCs as soon as reasonably practicable.</p>		
	<p>11) b)</p> <p>Remote Gas reconnection should only occur if the Retailer can reasonably satisfy itself that the reconnections can be completed safely....</p> <p>Is remote connection a possibility for Natural Gas? It is not available on reticulated LPG sites.</p>	11) b)	Gas Industry Co understands this functionality is available (although not currently activated) in the advanced gas metering infrastructure currently being deployed into the NZ gas market.
	<p>12) a)</p> <p>Retailers should, in their consumers care policy, provide easy-to-understand detailed information on all fees, charges (including disconnection and reconnection charges). Conditional discounts and bonds charged or made available to customers, even if the retailer has published them elsewhere on its website....</p> <p>Currently new customer welcome packs include links to website with this information. This ensures regardless of any changes since the customer has signed up they will always access the most current versions of any documents.</p>	12) a)	Noted.

Submitter	Additional Submissions		Gas Industry Co Comments	
	13) b) & c)	<p>Gas Industry Company will advise a Retailer of any non-compliance with the Gas Consumer Care Guidelines identified by Gas Industry Company. The retailer will work reasonably with Gas Industry Company to remedy any non-compliance. Gas Industry Company may publish the details (including Retailers names) of any identified non-compliance with Gas Consumer Care Guidelines.</p> <p>Rockgas would enquire how there can there be non-compliance to a voluntary scheme? Gas Industry Company has the rights to publish details including a retailer's name for non-compliance Rockgas would strongly object to this. As stated in the document it is deliberately non-prescriptive and is intended to provide a framework within which participants can innovate. By allow retailers licence to interpret, without providing clarity or concise language and allowing innovation "Compliance" to become relative and subject to interpretation.</p>	13) b) & c)	As discussed above, Gas Industry Co disagrees with the FirstGas submission – compliance with voluntary guidelines is possible and Gas Industry Co considers it is capable of assessing such compliance.
	7	"Stand-alone Gas retailers" not defined in Appendix	7	"Stand-alone gas retailer" is defined in the body of the guidelines at clause 7 of the Gas Consumer Care Guidelines Guidance Notes.
	9	Reference for line 37. "The Gas Consumer Care Guidelines are deliberately non-prescriptive. This non-prescriptive approach is intended to provide a framework within which participants can innovate"...	9	Noted.
	11. & 12.	Alignment of timing without clarification of what is a "Stand-alone Gas Retailer"	11. & 12.	Noted. The guidelines apply to "retailers" – that is, the entity with the relevant retailer contract with the customer. If an LPG retailer (being the retailer

Submitter	Additional Submissions		Gas Industry Co Comments	
		While Stand-alone Gas Retailer is undefined how are retailers to determine who commences in 12 months verses who commences in 24 months? Rockgas currently has a Marketing alliance with Contact Energy, there are dual energy companies in Market however both companies are individually and separately owned. If Rockgas was found to not be a Stand-alone retailer due to our association with Contact, would that then flow on Rockgas Franchises?		with a contract to provide LPG services to a customer) does not also supply electricity to customers, then that LPG retailer will be subject to the Gas Industry Co's 24-month survey process.
	Appendix B	<p>"Gas Distributor" means any who supplied line function services (in respect of natural gas or LPG), whether by means of a distribution system or by other means, to any Gas Retailer.</p> <p>In this case does any retailer who has an LPG retic network then become both a retailer and a distributor?</p>	Appendix B	Correct.
	Appendix B	<p>"LPG Bottle" means 45kg bottle, again is the intention of the Consumer Care Guidelines to exclude all other sized LPG cylinders supplying to residential properties</p>	Appendix B	Correct.
	Appendix B	<p>"LPG Retailer" Means any person who supplies LPG to a customer by reticulated distribution or in LPG Bottles.</p> <p>As mentioned earlier if it is not the intention of the Consumer Care Guidelines to exclude some residential consumers then LPG Retailer may then be extended to 3rd party resellers including service stations, Hardware stores and any bottle swap site</p>	Appendix B	The guidelines apply to all persons who sell 45kg LPG bottles to customers for residential use.
	Appendix B	<p>References Gas (Switching Arrangements) Rules 2008- This applies to Natural Gas only</p>	Appendix B	Noted.

Submitter	Additional Submissions		Gas Industry Co Comments	
	4) b)	Powerswitch- while the inclusion of LPG cylinders being added to Powerswitch is still under review, it is critical to point out that if a consumer picks the cheapest retailer, it does not ensure a retailer will be able to deliver to their site. All onboarding of new customer sites is subject to a site inspection, this is to assess the sites compliance, safety and access availability. Rockgas take the safety and wellbeing of our team very seriously and will not take on a site that may endanger the wellbeing of any team member. Rockgas has also encountered sites that have been unable to be serviced by our large trucks, however the site could easily be accessed by an opposition's smaller truck. There are many considerations when onboarding a new residential premise, unlike electricity or piped gas a person is accessing the site for each delivery this adds further complexity to the onboarding process. Rockgas is unable to support this until a review has been consulted on agreed to and finalised.	4) b)	Noted. Inclusion of LPG pricing on the Powerswitch website is not a guarantee to supply gas to any particular premise or any particular customer.
	4) b) iii)	retailers must supply clear and prominent information about Powerswitch: on their website, comms about service and price changes and on invoices..... It also specifically states "to residential consumers of LPG on an annual basis: and" - Rockgas would enquire why is there a further requirement to supply annually, when customers are already being supplied this information monthly on invoicing.....	4) b) iii)	The separate annual Powerswitch notification is intended to draw additional attention to this service for the benefit of customers.
	10	Utilities Disputes explained.... "Utilities Disputes help to resolve complaints about electricity, gas water and access to shared property for fibre installations. <u>Its service is free</u> , independent, and fair.....	10	The messaging is intended for consumers – the service is free to consumers.

Submitter	Additional Submissions	Gas Industry Co Comments	
		This service is not free for retailers, this messaging may be relevant for consumers facing documents, but this document is for Gas Industry, but is factually inaccurate for Gas Industry.	



Appendix D – Notice of Potential MDC Status

Notice of Potential Medically Dependent Consumer (MDC) Status

(HP notice)

To the Patient

Please pass this form onto your gas provider.

PART A - PATIENT DETAILS

Patient's name: _____

Patient's date of birth: _____

Patient's contact phone number(s):

_____ (h) _____ (m) _____ (w)

Caregiver's contact phone number(s) – *if different from patient's*:

_____ (h) _____ (m) _____ (w)

Full physical address (*PO Box or RD is not acceptable*) where the patient will reside on discharge (*Residence*):

Name(s) of gas account holder(s) at residence where the patient will reside on discharge:

Contact phone number(s) of gas account holder(s):

_____ (h) _____ (m) _____ (w)

Residence's gas ICP number (*this can be found on the residence's gas bill – usually up to [15] characters*): _____

Residence's gas account number (*this can be found on the residence's gas bill*):

Consent: As the recipient of this medical equipment and a potentially medically dependent consumer, I consent to the information on this form and information on the future status of my dependence on the medical equipment to be shared between the health practitioner(s), gas retailer(s), distributors and metering service providers and/or the gas account holder for the domestic residence where I will be residing, for the purpose of ensuring that the gas retailer, gas distributor and metering service provider is informed of my medical dependence on gas equipment and my status as a medically dependent gas consumer. The gas retailer may use this information to identify residences where gas disconnection, for whatever reason, may have significant consequences.

Patient signature: _____ Date: _____

and/or

Caregiver signature: _____ Date: _____

PART B - CONFIRMATION THAT GAS IS REQUIRED

I certify that _____ (patient's name) with NHI number _____ is:

- (i) using natural gas or LPG dependent critical medical equipment (CGME); and
- (ii) at some point in the future may be dependent on the CGME to the extent that disconnection may result in loss of life or serious harm. (If so, the patient is a potentially medically dependent consumer of gas .)

I also certify that the patient listed above has been provided knowledge, training and support, in accordance with appropriate clinical practice:

- (iii) for the use of the CGME; and
- (iv) what to do in an emergency, including when the supply of gas may be interrupted for any reason.

Where:

- (v) Critical medical support is defined as support which, in the opinion of a DHB, private hospital or GP, is required to prevent loss of life or serious harm; and
- (vi) CGME is defined as any equipment supplied or prescribed by a DHB, private hospital or GP, which requires natural gas or LPG to provide critical medical support to a person, and includes other gas-fuelled equipment needed to support either the CGME or the critical treatment regime (e.g., gas-fuelled space heating, water heating or refrigeration, where the same is needed to support a critical care treatment regime).

Note: The patient's gas retailer may seek advice on the patient's status as a MDC if at any point in the future the patient faces disconnection.

Date: _____

Name of DHB/private hospital/GP:

Name of the health practitioner treating the patient (including designation):

Signature of the health practitioner treating the patient:

OR

Name of another health practitioner, signing on behalf of the health practitioner treating the patient (including designation):

Signature:

Contact number and/or email address of signatory:

Disclaimer: The DHB/private hospital/GP/issuer of this Notice of Potential MDC Status on behalf of the patient, takes no responsibility for any debts incurred by the patient in relation to transactions or arrangements entered into by the patient with the gas retailer.

ADDITIONAL:

Notice of Potential Medically Dependent Consumer Status (Notice of Potential MDC Status)

The Notice of Potential MDC Status has 2 parts:

Part A – to be completed by the patient/caregiver.

The DHBs, private hospitals and GPs can assist retailers by checking that the patient/caregiver:

- has filled in as much of the form as possible as this will assist his/her retailer to identify the correct account. Specifically, providing a residential address (not a PO Box or RD number), and recording the names of any of the household members who may be the account holder, will be particularly useful;
- understands and has signed the consent portion of the form; and
- understands the importance of:

- completing the Notice of Potential MDC Status; and
- giving the Notice of Potential MDC Status to the patient's retailer.

Part B – to be completed by a representative of the DHB, private hospital or GP, and signed by the health practitioner treating the patient (or by another health practitioner signing on behalf of the health practitioner treating the patient).

DHBs, private hospitals and GPs should check that the patient/caregiver has been informed of all relevant aspects of using the CGME and any gas-fuelled equipment needed to support either the r the critical treatment regime, including:

- what to do in the case of planned or unplanned gas outages; and
- information on the likely costs associated with operating the CGME and any gas-fuelled equipment needed to support either the CGME or the critical treatment regime and, if appropriate, advising the patient/caregiver that financial assistance may be available from Work and Income.

DHBs, private hospitals and GPs should also ensure that patients are well enough or with sufficient support to effectively communicate with their retailer when discharged from the hospital with CGME.



Appendix E – Template Gas Consumer Care Policy

[Company name]

Gas Consumer Care Policy for Retailers

XXX 2022

[Note for policy template users:

- This template policy has been developed by Gas Industry Company to assist retailers with the development of a gas consumer care policy, in line with Gas Industry Company's Gas Consumer Care Guidelines.*
- This template policy complies with Gas Industry Company's Gas Consumer Care Guidelines.*
- Retailers may amend this template policy, or develop their own policy, as they consider expedient. However, care should be taken to ensure any policy amendments, or new policy, align with Gas industry Company's Gas Consumer Care Guidelines.*
- Gas Industry Company may issue changes to this policy template from time to time, as it considers reasonably necessary.]*

Consumer Care Policy

This document is a guide to how we can work together to help you as a consumer. We want you to have a warm and healthy home.

If you are in financial hardship or having trouble paying your bills, let us know how we can support you.

About this document

This document is our Consumer Care Policy.

It contains helpful advice, our contact details, and explains how we will:

- Act to make sure we have a good relationship with you.
- Give you the best chance to afford the natural gas or LPG (gas) you need.
- Help to minimise the harm caused by not having enough gas or not being able to pay your bill.

It tells you where you can find the extra support you might need and how we can help, including if your health depends on gas.

Key:

- **[Red text]** – brackets containing red coloured text are used to indicate notes to the retailer, or customisable or optional text.
- **Bold text** – text in bold denotes text that is more or less mandatory under the Gas Industry Company's Consumer Care Guidelines'. Check with the guidelines before amending.

This Consumer Care Policy is one of several documents explaining the relationship between you, the consumer, and us, your gas retailer. The other documents are our contract for gas supply and our standard terms and conditions.

We're here for you

We're proud to be your gas retailer.

We understand that using **gas in your home is very important for the wellbeing of you and your whānau.**

As your gas retailer, it is our job to:

- Supply you with the gas you need to live your life.
- **Make sure you have every opportunity to choose the best pricing plan to meet your needs.**
- **Communicate with you clearly and on time.**
- Treat you with **care and respect.**

Our promises

As your gas retailer, we want to make sure that:

- We **understand your situation and are proactive in offering assistance.**
- We **work with you collaboratively and constructively to solve problems.**
- We **work with you to resolve payment difficulties and, with your permission, can link you to one or more support agencies or social agencies to assist you.**
- We **work with you to try to keep your gas connected if you are having payment difficulties.**

If you use gas from us, we will communicate with you clearly about your rights and the choices you can make, **even if you have not signed up with us yet.**

We view the disconnection of gas for non-payment of bills as a last resort. We will work with you to try and keep your gas connected and avoid building up debt.

We might not always get it right, but we are **committed to learning continually from our experiences to improve the support we offer you.**

What you can expect from us

We'll help you by making it as easy as possible to pay for the gas you use.

We offer standard terms and conditions to all our customers. You agree to these when you become a customer and consume gas from us.

These terms and conditions are updated from time to time. You can read the latest version on our website: [website address for terms and conditions](#)

You also have access to complaint resolution through the Utilities Disputes process and support under the Gas industry Company's 'Gas Consumer Care Guidelines'.

As a responsible gas retailer, we work within these guidelines, and we are always looking for ways to improve our service to you.

You can find the Gas Consumer Care Guidelines on the Gas industry Company's website: [XXX](#)

What we expect from you

As a gas consumer, you have a set of rights and responsibilities.

We ask that you pay for the gas you use.

Reply to messages we send you, so we can know more about your situation and provide additional help if required. We ask you to work with us positively, the more we work together the more we can help you.

If you are in financial hardship or having trouble paying your bills, let us know how we can help you.

Even if you have had problems with your gas retailer in the past, still contact us so we can help you.

Commitment to inclusion

We are an inclusive gas provider, and **we work to make sure that all our customers have access to the support we offer regardless of language, ethnicity, educational achievement, culture, gender, physical and intellectual ability, age, health, income, and wealth.**

We offer all our customers a variety of support options, including payment plans, to help make gas more affordable for you.

Ways we can help you

Signing up as a customer

We want to have you as a customer, so we will help you through the sign-up process.

You can sign-up here: [Insert primary & secondary channels for acquiring new customers]

Becoming a customer means agreeing to us supplying you with gas, agreeing to our terms and conditions, and choosing the right gas plan for you – see the next subsection for more information.

Before you become a customer, we will ask you questions about yourself and your situation.

If we think there is another gas retailer or a better option for you, we will tell you about them.

We conduct credit checks and will consider this along with all other information you provide to us. In cases of poor credit history, we will provide advice on actions you may take to get gas from us or another retailer.

If we do not offer you a contract, we will tell you why. If you are having a hard time finding a gas retailer, we can advise you on what you can do, including referring you to support services.

Choosing the right gas plan

We offer a range of gas plans designed to make it cheaper for you, suit different households, or provide extra services you might like to receive.

These plans include a daily fixed charge and a usage charge based on the amount of gas you use. [amend this sentence if your plans are structured differently]

We can offer you different billing periods over a week, a fortnight or a month [include all payment periods that you offer]. We can also offer you a "smooth pay" option, which averages your gas bills. This means that you pay regular amounts spread out over a year.

To help you decide which gas plan might suit you best, **we can talk about how you usually use energy in your household and your past gas consumption.**

Talk to us about your options and which plan is best for you: [insert phone number or website address]

Using gas smartly

We want to help you keep your home healthy and warm.

We can offer you advice on how to use your gas in a way that saves you money. There may be simple changes you can make to your home and the way you use gas to keep it warm in winter, and keep your energy costs down.

For more energy-saving tips, visit these website[s]:

- www.genless.govt.nz/living/lower-energy-homes/

We also recommend talking with someone in your community who can provide energy efficiency and healthy homes advice. This advice could be over the phone or an in-home visit. You can find a group near you here: www.communityenergy.org.nz

If you are limiting the amount of gas you use in order to pay your bills, contact us for help. For example, if you are not using your gas heater enough during cold weather.

We will contact you at least once a year to check your situation.

Communicating clearly

We value our relationship with you. We want to provide you with **understandable, timely, clear, and accessible communications**.

You can choose the best option for how and when **we communicate with you based on your needs**.

This includes how and when you receive your bill, and how you want us to contact you.

You can see all the ways that we can communicate with you on our website: [insert retailer webpage address on communication options]

If you need someone to act on your behalf

You can ask us to communicate with you using an **alternative contact person** if you prefer.

An alternative contact could be a family member, friend, support person, or community worker.

Ask this person first. Then, if they agree, you can tell us their name and contact details by [insert communication method here].

Once this is settled, we will work with your alternate contact to make sure that you understand what is happening with your gas bills and what payments you need to make.

Speaking your language

If you would like to speak to us in a language other than English, we will try to help.

[If you have call centre staff capable of multiple languages, use section A, if you use a third-party interpreter service use section B, if you do not have the capacity to speak to customers in a language other than English use section C]

Section A

We have a small number of multilingual staff available in our call centre. To see the languages we offer, see our website: [web page of languages available in call centre].

Section B

We use an interpreter service that may speak your language. To see the languages we offer, see our website: [web page of languages available through interpreter services].

Section C

If we do not speak your language, you have other options.

You can use an alternative contact to talk with us instead; see the above section 'Using an alternative contact'.

Another option is to use a different communications method that suits you. For example, you could receive information from us in writing. See the above section 'Communicating clearly'.

Contact our team to set up an arrangement that suits you: [Retailer contact details for non-English customers]

Making it easier to pay

Ways to pay

You can choose how to pay your bills with us.

You can:

[List of all methods customers can use to pay bills]

Tailoring one of these options might work better for you, talk to us about what we can do.

Viewing your account

Managing your gas account is important to us.

To see your account, which plan you are on, and how to make payments, go to: [Insert contact channel for customers to engage with their account]

If you are using our smartphone app, a how-to guide is available on our website at:

[Insert webpage for app guidance]

You can view your past gas use on our website and app.

Making a payment plan

You can pay your bills weekly, fortnightly, monthly or on the due date. [include all payment periods that you offer]

If you are finding it hard to pay your gas bill, we're here to help.

Contact us to discuss your payment options: [Insert phone number of retailer].

We can also help you set up a payment plan which works best with your budget. This way, you know when and how your gas bills are getting paid.

Similarly, if you have an outstanding balance on your account, we can help you set up a repayment plan that suits you.

We will not change your payment plan without telling you first.

We will monitor your payments to check your repayment plan is working well. We may contact you if we think there is a better way for you to set it up.

We will not disconnect your gas if you are on a payment plan and making the agreed payments.

Linking you with financial mentoring and support organisations.

We can help you if your family or household needs a bit of extra support.

We have relationships with different people and organisations in your community that offer financial mentoring and money advice. They can help you work out how best to pay your bills as well as supporting you with other issues your family or household might have.

If you agree, we can connect you with one of these support people who will help you.

Once contact is made, **we will give you some time to talk to the agency and receive help without disconnecting your gas supply** if you are having trouble paying your bills.

We will work with you and your support organisation as a partnership, making sure we all use agreed ways of communicating with each other.

Our fees and bonds

We occasionally charge additional fees or bonds.

These are only charged when necessary and when we have provided extra services to you. If you ask us to provide an extra service, we will tell you the fee beforehand.

Here is a list of the fees and bonds we charge. All our fee and bond amounts are published on our website: [retailer web page of all fees, charges, and bonds].

Charge	Reason
[Charge 1]	[Reason]
[Charge 2]	[Reason]

If a fee is high, you can ask us about spreading your payments across a period of time to make it easier for you.

Protecting the health of medically dependent consumers

The health and wellbeing of our consumers is very important to us.

Some people, known as medically dependent consumers or 'MDCs' rely on gas to prevent serious harm to their health. This could be because a health practitioner has supplied or prescribed medical equipment that requires a constant gas supply.

Contact your doctor (General Practitioner or 'GP') and talk through your situation with them if you think that gas is particularly important for the health of you or someone in your household, or if you are unsure about this.

If you think you, or someone in your household, is medically dependent on gas, let us know as soon as possible by [insert contact methods here].

Your district health board, hospital, GP or health practitioner will give you a "Notice of Potential Medically Dependent Consumer Status (HP notice)". You will need to let us know about this notice, and you can do this by [insert contact methods here].

We may ask you to provide evidence that you or your household member's MDC status is still the same from time to time. For example, we may ask for a letter from a GP that says that the Notice of Potential MDC Status still applies.

We do not disconnect the gas supply of medically dependent consumers for non-payment.

However, despite our best efforts, occasionally the gas supply is cut because of extreme weather, accidents, or technical problems, or in the case of the supply of LPG, your LPG cylinder will from time to time run out of LPG. In case this happens, you should have an emergency response plan.

An emergency response plan, for example, could be having a full, replacement LPG cylinder available, going to a friend or family member's house with electricity or gas or, in very serious circumstances, calling an ambulance to be taken to hospital.

Your gas supply

The gas you use relies on many businesses for producing the gas and getting it to your home.

Each gas bill you receive from us goes towards paying these businesses for this production, transmission, distribution, and metering, as well as what we do as your retailer.

Normally, we will take care of everything for you.

However, from time to time you may receive a notice directly from your local gas distribution company about planned gas outages in your area. This is when they turn off the gas to your home for a set period of time to do maintenance work or upgrade the pipes and associated infrastructure.

Sometimes things go wrong and there is no gas supply to your home. We can help you work out what the problem is and who is best to fix it - for example, if there is a problem with the gas supply in your neighbourhood.

If you have lost gas supply to your home, contact us on: [Insert retailer phone number here]

Disconnections for non-payment & reconnections

We work hard to make gas as affordable for our customers as possible.

We will strive to keep you connected and view disconnections as a last resort.

For extra help paying your gas bills, contact us [Retailer primary contact method]

There are many ways we can help you pay for the gas you use. This includes checking to make sure your gas plan is right for you, offering different billing periods, multiple ways to pay, smooth pay, and custom repayment plans.

Even if you have had payment issues with us in the past, contact us so we can make a new repayment plan that works best for you and your current circumstances.

We can refer you to support services and financial mentoring in your community if you are not comfortable talking to us directly. Refer to the section 'Linking you with support organisations' to help you with money difficulties.

If you do not pay a bill on its due date, we will attempt to communicate with you directly and/or through the alternative contact you have chosen. Please engage with us so we can support you.

What communications you can expect from us

We want you to know what is happening with your account, so we will attempt to communicate with you a number of times about an unpaid bill. Our aim is to let you know about your rights and obligations, and support you to use the gas you need.

We will attempt to communicate with you using more than one method and using your alternative contact if you have provided us with one. We will also contact you at different times of the day to try to make it easier for you.

If we contact you, please respond so we can make payment arrangements and avoid proceeding to disconnection.

[The following is just a list of examples. Your steps must be tailored to how your communication to customers will work and must include one traceable form of contact, as required in the Guidelines. Be as specific as possible; for example, "all traceable forms of contact will be an app notification with read receipts".]

You can expect the following communications from us regarding an unpaid bill:

1. An invoice that tells you the amount due and the due date.
2. A reminder notice if the due date is missed.
3. Three follow-up attempts over more than a week.
4. A further notice using that will tell you the date on which we will disconnect your gas.
5. A final notice of disconnection.

Note that if we attempt to contact you by phone, we may not leave a voicemail, and we may ring you multiple times to speak with you. We do not use a blocked number.

[You should note that in item 3 above, once contact with the customer has been made successfully, there will not be any further attempts under item 3.]

Disconnecting your gas supply for non-payment

If you do not respond to the communications we send (listed above) and your gas bills remain unpaid, we may disconnect your gas supply.

Important: if you have told us that you or a member of your household is medically dependent on gas, we will not disconnect your gas supply for non-payment of bills. Follow the steps listed in the section 'Protecting the health of Medically Dependent Consumers'.

We will not disconnect your gas at a time that might endanger your wellbeing (e.g., just before nightfall, during severe weather events, or at a time when it would be difficult for you to get rapid reconnection).

If your gas supply is disconnected, you may have it reconnected. This may mean you have to pay a reconnection fee to cover the cost of doing this. This is explained in the section 'Our fees and bonds'. You will not pay a reconnection fee if you are disconnected in error.

To reconnect your gas supply, contact us [Retailer primary contact method]

Making a complaint

You can contact us at any time to talk about your situation, ask questions about your bill, or make a complaint.

If you have any concerns about the service you have received from us or if we haven't lived up to our commitments in this document, let us know first. We are committed to constantly improving our service and learning from mistakes.

Make a complaint by [Insert complaint channels here]

If you are not satisfied with the outcome, you can contact Utilities Disputes. This service is independent and free of charge.

Utilities Disputes

0800 22 33 40

info@utilitiesdisputes.co.nz

utilitiesdisputes.co.nz

Monitoring our performance

We uphold high standards of service and performance.

As a gas retailer, we are regulated and supervised by the Government and independent organisations. This is done through several organisations, including the Gas Industry Company, the Ministry of Business Innovation and Employment, the Commerce Commission, and Utilities Disputes.

To demonstrate our commitment to serving our customers, **we give information to the Gas Industry Company as required under the Gas Consumer Care Guidelines.**

Services that can help you

Powerswitch

Find the cheapest natural gas and natural gas plans. [Extend to include LPG, once service on Powerswitch extended]

www.powerswitch.org.nz

Money Talks

MoneyTalks is a free and confidential financial helpline that can connect you with financial mentors and other community services.

www.moneytalks.co.nz

0800 345 123

Citizens Advice Bureau

A nationwide network providing free, confidential, independent information on your rights and how to access the services you need.

www.cab.org.nz

0800 367 222

Work and Income

Work and Income is here to help you financially if you're on a low income or not working.

www.workandincome.govt.nz

0800 559 009

Community Energy Network

Energy efficiency and healthy homes community-based specialists.

www.communityenergy.org.nz

Eco Design Advisor

Improving the comfort, health and performance of New Zealand homes.

www.ecodesignadvisor.org.nz/resources

EnergyMate

EnergyMate is a free energy coaching service for households at risk of energy hardship that are struggling to pay their power bill or keep their home warm, delivered by the Electricity Retailers' Association.

www.energymate.nz/contact

Utilities Disputes

A free, independent, and fair service that resolves complaints about gas and gas.

www.utilitiesdisputes.co.nz

0800 22 33 40



Glossary

EA	Electricity Authority
EA CCGs	Electricity Authority's Consumer Care Guidelines (for electricity consumers)
EPR	Electricity Price Review
ERANZ	Electricity Retailers Association of New Zealand
Gas	Natural gas and LPG
Gas Act	Gas Act 1992
Gas Switching Rules	Gas (Switching Arrangements) Rules 2008
GIC	Gas industry Company
LPG	Liquefied Petroleum Gas
MBIE	Ministry of Business Innovation and Employment
MDC	Medically Dependent Consumer



Questions

Title of Report

Submission prepared by: <company name and contact>

Question	Comment
Do you agree with the final changes made to the Gas Consumer Care Guidelines?	
Do you have any comments on the draft Notice of Potential MDC Status?	
Do you have any comments on the draft Gas Consumer Care Policy for Retailers?	

About Gas Industry Co

Gas Industry Co is the gas industry body and co-regulator under the Gas Act. Its role is to:

- Develop arrangements, including regulations where appropriate, which improve:
 - the operation of gas markets;
 - access to infrastructure; and
 - consumer outcomes;
- Develop these arrangements with the principal objective to ensure that gas is delivered to existing and new customers in a safe, efficient, reliable, fair and environmentally sustainable manner; and
- Oversee compliance with, and review such arrangements.

Gas Industry Co is required to have regard to the Government's policy objectives for the gas sector, and to report on the achievement of those objectives and on the state of the New Zealand gas industry.

ENQUIRIES:
INFO@GASINDUSTRY.CO.NZ