



Voluntary Practice Benchmark for Electricity Retailer Management of Medically Dependent Consumers

Version 0.8
August 2018

Objectives

Ensuring application of the Electricity Authority's Medically Dependent Consumer Guidelines¹ (MDC guidelines) consistently delivers best outcomes for all consumers and retailers.

Key principles

1. All consumers are treated with respect, understanding and compassion.
2. The primary objective of the MDC verification process is correct identification of genuine MDCs to ensure that genuine MDCs are able to access all available support and that no genuine MDCs are placed at risk of disconnection for non-payment of their electricity bills.
3. Improving processes that support retailers' right to be paid, while ensuring that genuine MDCs are not placed at risk of disconnection.
4. Communications between retailers, health service providers and social and support agencies on the needs of MDCs are clear, and communication channels with retailers are easy for MDCs to use
5. MDCs are provided with relevant information in a manner that is accessible and easily understood².
6. MDCs experiencing difficulty paying their electricity bills (either temporarily or on a long-term basis) are identified as early as possible and are engaged by retailers under the practices in the associated *Voluntary Practice Benchmark for Electricity Retailer Credit Management* (the Credit Management Benchmark)³.

¹ *Guideline on arrangements to assist medically dependent consumers, Version 2.1*, available online at <http://www.ea.govt.nz/operations/retail/retailers/retailer-obligations/medically-dependant-and-vulnerable-customers/>

² This information includes the need for an individual emergency response plan in emergency situations, sources of financial support, etc.

³ Available online at <http://www.ea.govt.nz/operations/retail/retailers/retailer-obligations/>

Definitions

Medically dependent consumer⁴ A domestic consumer who is dependent on mains electricity for critical medical support⁵, such that loss of electricity may result in loss of life or serious harm. For the avoidance of doubt, medical dependence on electricity could be for use of medical or other electrical equipment needed to support the treatment regime (e.g. a microwave to heat fluids for renal dialysis or equipment such as that listed in Appendix B of the MDC Guidelines).

The MDC Guidelines and this benchmark use the term 'MDC' to include a potential MDC, verified MDC and reverified MDC.

Social agency Government Department or other agency with a statutory function or role.

Support agency Organisation that has been authorised to support, receive and request information on behalf of the consumer.

Health practitioner A person who is, or is deemed to be, registered with an authority as a practitioner of a particular health profession under the Health Practitioners Competence Assurance Act 2003. Includes DHBs, private hospitals and GPs.

Benchmarking

The practices on the following pages are actions that will help in the management of MDCs, in particular in relation to verification.

The list of mandatory actions on the following pages form the voluntary benchmark for a minimum practice requirement for retailers in dealing with MDCs when applying the MDC Guidelines.

This benchmark should assist retailers with compliance with the MDC guidelines.

⁴ This definition, and that of *Health practitioner* below, is the same as that used in the MDC guidelines.

⁵ Support which, in the opinion of a health practitioner with an appropriate scope of practice, is required to prevent loss of life or serious harm. This is usually provided by critical electrical medical equipment (CEME), which is any equipment supplied or prescribed by a health practitioner with an appropriate scope of practice, which requires mains electricity to provide critical medical support to a person, and includes other electrical equipment needed to support the treatment regime (e.g. a microwave to heat fluids for renal dialysis).

The Benchmark

Activity	Practice
<p>A. MDC identification and records</p>	<p>A.1 Upon sign-up of a MDC, through any channel, the retailer will request <u>as much</u> of the following information from the account holder as possible, or as the retailer considers reasonable in the circumstances:</p> <ul style="list-style-type: none"> i. Medical condition that requires equipment (including whether permanent or temporary); ii. Equipment (make/model/serial number); iii. Name of equipment user / NHI number; iv. Duration of time the MDC is likely to be at the address; v. DHB/Doctor – name and phone number; vi. Privacy waiver – for verification and conversing with support agencies; and vii. Confirmation that the MDC has an emergency response plan in place. <p>A.2 If the MDC is not the account holder, the retailer will, where considered reasonable in the circumstances, request the following extra information for each MDC at the address, over and above that requested in A.1 above:</p> <ul style="list-style-type: none"> i. Name; ii. Date of birth; iii. Relationship with account holder; and iv. A privacy waiver from the MDC that enables the retailer to communicate with the account holder in relation to verification of MDC status. <p>A.3 The retailer will have secure systems for recording, maintaining and adding information about MDCs within the requirements of the Privacy Act.</p>
<p>B. Confirmation/ Reconfirmation/ Removal of MDC status</p>	<p>B.1 Retailers are unable to remove MDC status from an MDC until the verification process has been completed in accordance with B.3, or the retailer has taken other reasonable steps to verify the MDC status of the consumer.</p> <p>B.2 The retailer, acting in accordance with processes of the Voluntary Practice Benchmark for Electricity Retailer Credit Management, will verify or reverify that a consumer is not an MDC prior to issuing a final disconnection notice, but may choose to verify at an</p>

Activity	Practice
	<p>earlier stage of the credit cycle (including immediately post sign-up).</p> <p>B.3 The retailer will verify using one, some, or all of the following methods as is appropriate in the circumstances:</p> <ul style="list-style-type: none"> i. Outbound calls to health practitioner or provider; ii. Field visits; iii. Requesting photos of equipment; iv. Request and receipt of forms from the health practitioner or provider; and, v. Contacting the MDC by texts, letters, calls, emails or other means. <p>B.3 In situations in which medically dependent status has been disputed, and/or all reasonable efforts have been made to verify the MDC status in accordance with B.3, retailers will advise/notify consumers and (where the MDC is not the account holder) the MDC. The advice or notification will be copied to Work and Income/health practitioners, as appropriate, and detail information on:</p> <ul style="list-style-type: none"> i. The fact that medically dependent status is disputed by the retailer; ii. Reason(s); iii. Timeframes for next steps (e.g. <i>"We have removed your medical dependency status, and the credit cycle will commence in 7 days"</i>); iv. Relevant contact details, including contact names of appropriate department or staff member within the retailer; v. Actions required on the part of the MDC if they would like to challenge the retailer's assessment (e.g. contact person within retailer, reference to contact their health professional, to Utilities Disputes Ltd); and vi. Assistance available (if any). <p>B.5 As per the MDC Guidelines, reverification will occur no more than once every 12 months.</p> <p>B.6 Retailers will make clear to the MDC that the MDC must have an individual emergency response plan in place after discussion with their health professional to deal with planned outages, unplanned outages and emergencies, and that the responsibility to have this sits with the consumer.</p>

Activity	Practice
<p>C. Communication with stakeholders</p>	<p>C.1 Retailers will ensure that they have open and established lines of communication with a range of stakeholders, which may include:</p> <ul style="list-style-type: none"> i. DHBs and health care providers, other health and disabilities service providers, including private hospitals, and other agencies who may have issued equipment; ii. Work and Income; iii. Support agencies, including The National Building Financial Capabilities Charitable Trust; iv. The Electricity Authority (who on occasion receive completed verification forms not identifying retailers); v. The Commissioner of Utilities Disputes Ltd; vi. Any participant under the Electricity Industry Participation Code 2010 that a Type 2 retailer purchases from (note: a Type 2 retailer is a retailer that has the contract to supply the consumer at an ICP but is not recorded in the registry as the trader responsible for that ICP); and vii. Electricity retailers (in the context of switching).
<p>D. Credit process</p>	<p>D.1 For MDCs, retailers will follow credit management processes agreed under the Voluntary Practice Benchmark for Electricity Retailer Credit Management.</p>