

**Powerco Limited**  
**Submission on the Electricity Commission's proposed amendments to**  
**the MDC Guidelines, MDC and MUOSA, June 2008**

Question	Comments on the proposed amendments to the MDC, MDC Guidelines or MUOSA regarding:	Comment
1	Alignment of service timeframes.	No comment
2	Alignment of customer obligations regarding access.	No comment
3	Alignment of reliability of supply clauses.	No comment
4	Alignment of the margin of variance re supply voltage and frequency clauses.	No comment
5	Alignment of disconnection/termination clauses.	No comment
6	Alignment of Good Industry Practice definitions.	No comment
7	Alignment of limitation of liability clauses.	No comment
8	The addition of clauses relating to the "Guideline on arrangements to assist low income and vulnerable consumers".	No comment
9	Changes to the transparency of line and energy charges clauses.	No comment
10	Format for publication of tariffs and line and energy charges on retailer websites as set out in Appendix 3	No comment
11	Changes to the definitions relating to customer service lines.	<p>Powerco is generally supportive of the proposed changes around customer service lines. However, an inconsistency has now arisen between the MDC and MDC Guideline as a result of the proposed amendments. In the MDC, clauses 26.5 and 131 both deal with costs payable by consumers for work on customer service lines. The MDC Guideline paragraph 47 addresses the same issue. Clause 26.5 reflects the reality of what happens in the field whereas 131 and 47 do not.</p> <p>In many situations it will not be apparent until a line mechanic arrives on site and traces the fault that it is identified that the repair is needed to be made to a service line not a network line. In those situations,</p>

		<p>which are often after hours, or around milking time, the consumer and the line mechanic's priority is restoration.</p> <p>The line mechanic will not always know until after they have finished, how long the job will take, the cost in time or the cost of components replaced. In addition, in rural areas there is often a substantial distance between the dwelling of a consumer and the location of the fault which make it difficult to communicate with a consumer.</p> <p>The obligations in 47 and 131 to advise of the cost before work commences, could leave retailers (and distributors and their contractors) wasting a lot of time and money or being reluctant to do customer service line work because of the difficulty in complying with this obligation. This will not be in the best interests of consumers who could be disadvantaged by having to wait for another independent contractor to arrive- which could be the following day and/or after milking time.</p> <p>Powerco recommends that the principal in 26.5 applies and that 131 and 47 are amended to reflect a requirement to inform customers that there will be a cost but not the exact cost.</p>
12	The addition of clauses highlighting the tax implications for distributed generation.	No comment
13	Removal of references to the Electricity and Gas Complaints Commission and Code of Practice	No comment