

15 October 2021

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Commerce Commission  
Wellington

Nova Energy Limited  
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Speak to one of our team  
0800 668 236  
7.30am to 7pm – Monday to Friday

Or email us  
[info@novaenergy.co.nz](mailto:info@novaenergy.co.nz)

## **NOVA ENERGY SUBMISSION TO THE COMMERCE COMMISSION: IMPROVING RETAIL SERVICE QUALITY – DRAFT BASELINE REPORT**

### **PUBLIC VERSION**

1. Nova Energy Limited (**Nova**) welcomes the opportunity to provide a submission to the Commerce Commission (**Commission**) in relation to the questions set out in the Commission’s “Improving Retail Service Quality – Draft Baseline Report” dated 14 September 2021.
2. By way of background:
  - (a) Nova is a wholly owned subsidiary of The Todd Corporation, which has been one of New Zealand’s leading energy explorers and producers for around 60 years. Todd Generation Limited, also a wholly owned subsidiary of The Todd Corporation, holds an interest in approximately 170 megawatts of installed power generation capacity. Nova is a supplier of electricity and natural gas to wholesale, retail and industrial markets.
  - (b) In 2018 Nova entered the telecommunications market and currently supplies fixed-line broadband and voice services. This includes voice calls originating on a fixed telephone network using VoIP to residential customers.
  - (c) In 2019 Nova purchased the business of Total Consumer Services Limited and its corporate group (trading as MegaTEL) including its fixed-line broadband and mobile customer books. The MegaTEL business supplies mobile services as an MVNO (pursuant to an agreement with Spark as the MNO) and now operates as a standalone division of Nova.
3. Regarding question 4 (of the proposed RSQ matters, which ones do you think we should address first?), Nova considers the switching process should be addressed first for the reasons set out in our earlier submission dated 26 February 2021.
4. Nova suggests that any RSQ code pertaining to switching should be paired with the creation of telecommunications registry, for greater transparency and consumer satisfaction across the telecommunications industry.
5. Nova considers that the telecommunications industry and all consumers would benefit from the creation of a broadband (or wider telecommunications) registry/database; similar to the electricity registry maintained by the Electricity Authority.
6. Nova considers that a telecommunications registry would be likely to deliver the following benefits to both retailers and consumers:
  - (a) transparency around the exact connection options at every property in New Zealand;

- (b) transparency as to the incumbent RSP(s) for every connection point – i.e. removing the issue of having multiple services from multiple retailers on the same ONT;
  - (c) avoid confusion and give greater certainty regarding customer site identification and demarcation;
  - (d) create a more streamlined switching process – e.g. by improving visibility regarding, or removing entirely, the open service order issue described above;
  - (e) potentially create a more streamlined billing reconciliation process – e.g. by having greater transparency over who is (and who has been) the RSP for each connection point, there may be fewer cases of consumers being unfairly billed by their previous RSP after the consumer's contractual termination notice period has ended; and
  - (f) promote and help ensure that RSPs are compliant with industry regulation generally.
7. We would be happy to meet with the Commission to further discuss our submission and to answer any questions that you may have. Please direct any questions or other matters regarding this submission, in the first instance, to:

Cameron Pentecost – Legal Counsel – Todd Corporation

[REDACTED]

Yours sincerely,

Michael O'Donnell  
General Manager – Nova Retail