



13 October 2023

Andrew Young
Manager, Retail Service Quality
P O Box 2351
Wellington 6140

By email: market.regulation@comcom.govt.nz

Dear Andrew and team

Re: Bundling Guidelines

Flick is a pioneer of independent electricity retailing in New Zealand, coming to market with an innovative and disruptive business model in 2014. Flick has always been for the customer; our value proposition is "We are deliberately on the customer's side". Flick believes competition and innovation is critical to the long term interests of consumers in terms of reducing prices and delivering social and environmental outcomes in the sector.

Flick supports the Commerce Commission's (Commission) proposal to implement Product Disclosure – Retail Service Bundling Guidelines. Making sure consumers have access to transparent and detailed information about the contents and consequences of any 'bundle' is imperative to inform their choice of products and services that meet their needs at a fair price.

We agree with the issues the Commission has identified that are currently imposing additional costs on consumers. The requirements in Part Two of the proposed Guidelines on Product Disclosure for Bundled Retail Telecommunications Services are comprehensive and will have a measurable positive impact for consumers.

We suggest the Commission prioritise monitoring alignment with these Guidelines and be clear about any consequences of non-alignment.

Yours



Pavan Vyas
Chief Executive Officer