



**Submission to the Electricity Commission
on its Proposal to Approve a Joint
Electricity and Gas Complaints Resolution
Scheme: March 2009**

From

Contact Energy Limited

20 April 2009

Introduction

Contact Energy Limited (“Contact”) welcomes the opportunity to provide feedback to the Electricity Commission (“EC”) and Gas Industry Company (“GIC”) on the Proposal to Approve a Joint Electricity and Gas Complaints Resolution Scheme.

For any questions related to this submission, please contact:

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Discussion paper questions

QUESTION	COMMENT
<p>Q1 Do you agree that the EGCC Scheme arrangements represent an appropriate basis for a single nationwide complaints resolution scheme for electricity and gas?</p>	<p>Yes.</p>
<p>Q2 Do you have particular areas of concern that would lead you to making suggestions for changes to the EGCC Scheme?</p>	<p>We consider that there should be a mediation step in the process before matters become adversarial and proceed to the determination stage.</p>
<p>Q3 Do you agree that approval should be on the basis of an indefinite term, while encouraging cost-effective performance through the independent review process? If not, do you have any additional observations on the merits of a fixed-term?</p>	<p>Yes, we agree with the indefinite term. However, we believe that the 3 year review period is too long and should be changed to 18 months.</p>
<p>Q4 Do you agree that the transition to an approved EGCC Scheme should be relatively straight-forward? Do you have any views on how the transition should be managed?</p>	<p>Yes we agree that the transition should be relatively straight forward. We believe that any existing outstanding complaints from outside the EGCC Scheme need to be managed by the EC & GIC.</p>
<p>Q5 Do you agree that the Service Provider Regulated Scheme and the Fully Specified Regulated Scheme are the only reasonably practicable options to approving an applicant scheme, which meet the proposed regulatory objective? If not, what other reasonably practicable options exist in your view?</p>	<p>Yes.</p>

QUESTION	COMMENT
<p>Q6 Do you agree that the costs and benefits set out in the table are the main costs and benefits that need to be considered? If not, what other costs and benefits would you suggest?</p>	<p>Yes. We would like to see Section 7 have a Member Benefits Section as none currently exists.</p>
<p>Q7 Do you agree that the simple scoring system set out in the table is a reasonable way of comparing costs and benefits across the options?</p>	<p>Yes.</p>
<p>Q8 Do you agree that the range of weighting of costs and benefits in the table are reasonable? If not what alternative weightings would you suggest?</p>	<p><u>Operating Costs 7.11:</u> We consider that the operating costs will not necessarily rise due to a rise in complaints. This assumes that the EGCC is currently operating at full capacity and that no efficiencies can be gained by the increase in volume, which may not be accurate.</p>
<p>Q9 Do you agree that the Approved Scheme option (approving the EGCC Scheme is the best of the reasonably practicable options?</p>	<p>Yes.</p>
<p>Q10 Do you agree that the Approved Scheme option (approving the EGCC Scheme) would yield overall benefits that are reasonably material and that these benefits would outweigh the slight increase in overall costs that could be expected relative to the Status Quo?</p>	<p>Yes. We do not necessarily agree that there will be an increase in costs in the EGCC.</p>
<p>Other issues (note achievement standard number if appropriate)</p>	<p>As a scheme member are we able to have input into what the monitoring requirements will be? We seek clarification on this point.</p>