



AUSTRALIA & NEW ZEALAND
ENERGY AND WATER
OMBUDSMAN NETWORK

17 April 2009

Bronwyn Christie
Electricity Commission
PO Box 10041
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By email: submissions@electricitycommission.govt.nz

Electricity Commission and Gas Industry Company Consultation Paper on Options for Complaints Resolution

Thank you for the opportunity to make a submission on your consultation paper *Proposal to Approve a Joint Electricity and Gas Complaints Resolution Scheme*.

The Australia & New Zealand Energy and Water Ombudsman Network (ANZEWON) strongly supports the Electricity Commission and Gas Industry Company's proposal to approve the Electricity and Gas Complaints Commission (EGCC) as the joint electricity and gas complaints resolution scheme.

As set out in our earlier submissions¹, we believe a single industry scheme will benefit energy consumers, the energy industry and the general community. A single scheme is more accessible and more cost effective than multiple schemes.

We also endorse the Achievement Standards used to select the EGCC Scheme as preferred provider, in so far as they are based on the Australian Benchmarks for Industry Based Consumer Dispute Resolution Schemes. These benchmarks remain best practice and are the basis of membership of ANZEWON.

Yours faithfully

Clare Petre, Energy & Water Ombudsman NSW

Fiona McLeod, Energy and Water Ombudsman (Victoria)

Chris Field, Energy Ombudsman WA

Simon Allston, Energy Ombudsman Tasmania

Barry Adams, Energy Ombudsman Queensland

Judi Jones, Electricity and Gas Complaints Commissioner

¹ 8 May 2008 submission to consultation paper *Approval of a Joint Electricity and Gas Complaints Resolution Scheme*



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**Electricity Commission and Gas Industry Co Consultation Paper, March 2009
Proposal to Approve a Joint Electricity and Gas Complaints Resolution Scheme**

Submissions prepared by: Australia & New Zealand Energy and Water Ombudsman Network (ANZEWON)

QUESTION	COMMENT
Q1: Do you agree that the EGCC Scheme arrangements represent an appropriate basis for a single nationwide complaints resolution scheme for electricity and gas?	Yes. The EGCC Scheme meets the achievement standards set by the Electricity Commission and Gas Industry Co and its governance structure achieves the appropriate balance between industry and consumer representatives.
Q2: Do you have particular areas of concern that would lead you to making suggestions for changes to the EGCC Scheme?	No.
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 additional observations on the merits of a fixed-term?	Yes. An approval for an indefinite term will ensure the scheme remains cost-effective. The regulators can still use the review processes to ensure the scheme continues to meet the achievement standards.
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?	Yes. We understand the majority of the energy industry already belongs to the EGCC Scheme which would reduce any impact on the transition to an approved scheme.
Q5: Do you agree 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?	Yes so long as there is a single provider for the regulated scheme to ensure it is still accessible and cost-effective.



QUESTION	COMMENT
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?	Yes.
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?	Yes.
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?	Yes.
Q9: Do you agree the Approved Scheme option (approving the EGCC Scheme) is the best of the reasonably practicable options?	Yes because the EGCC scheme has already been in existence for eight years and provides a specialised service in resolving complaints within the energy industry.
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?	Yes. We believe the <i>status quo</i> of multiple schemes with various degrees of compliance with the achievement standards is not an acceptable option.