



NEW ZEALAND FEDERATION OF  
FAMILY BUDGETING SERVICES (INC.)  
TE RŌPŪ PENAPENA PŪTEA  
WHĀNAU O AOTEAROA

P O Box 24382  
Wellington  
Ph:(04) 471-1420  
Fax:(04) 471-1490  
[enquiries@familybudgeting.org.nz](mailto:enquiries@familybudgeting.org.nz)  
[www.familybudgeting.org.nz](http://www.familybudgeting.org.nz)

20 April 2009

Bronwyn Christie  
Electricity Commission  
PO Box 10041  
Wellington

## **SUBMISSION: Submission on Approval of a Complaints Resolution Scheme**

### **Background**

The Federation is a collective of community organisations that share a common code of ethics, philosophy, and commitment to delivering quality, free budgeting advice to families/whanau and individuals. The current membership comprises 143 budget services throughout New Zealand that employ over 1200 predominantly volunteer staff and represent more than 30,000 clients annually.

### **Introduction**

1. Thank you for providing the community with the opportunity of providing feedback on the...

### **Submission**

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 we do. In particular having a single nationwide scheme will provide clarity of who to contact and consistency and fairness of decisions for all consumers no matter which electricity provider they use.

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 any additional observations

Yes. An indefinite term will provide security for consumers as well as employees in the scheme. If people need to be employed on a fixed term basis you may not be able to secure such good quality staff.

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. It is important not to change the phone number of the current EGCC scheme, which the majority of consumers no know. Consistent accessibility is a key factor for communities.

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?

No 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?

No comment.

Q9: Do you agree that the Approved Scheme option (approving the EGCC Scheme) is the best of the reasonably practicable options?

Yes.

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, definitely. Our organisation has had a lot of interaction with the current EGCC scheme and can report considerable overall benefits that we believe must continue. In particular, these are: accessibility, fairness and the positive and helpful information and advice provided to both consumers and community groups. The effective networks and relationships established to date should not be ignored.

The New Zealand Federation of Family Budgeting Services Inc thanks the Electricity Commission for offering it the opportunity to make this submission on the Commissions Consultation Paper.

Yours sincerely

Jarrod Rendle  
Information & Policy Officer  
NZFFBS Inc.