



PO Box 6144
Wellington, New Zealand
Telephone 0800223340
Facsimile 0800223347
Email: info@egcomplaints.co.nz
www.egcomplaints.co.nz

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Bronwyn Christie
Electricity Commission
PO Box 10041
Wellington

By email: submissions@electricitycommission.govt.nz

Electricity Commission and Gas Industry Company Consultation Paper

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

The Electricity and Gas Complaints Commission believes the assessment criteria proposed in the consultation paper are appropriate. Basing the Achievement Standards on the Australian benchmarks provides a credible independent dispute resolution scheme.

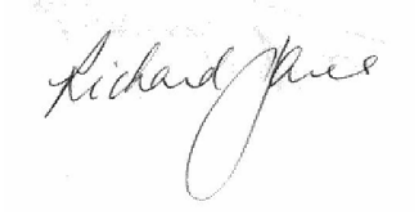
We also believe selecting the Electricity and Gas Complaints Commissioner Scheme, as the approved scheme, is the right choice and this is confirmed by the comparative assessment undertaken by the panel.

The approval of only one scheme is important to avoid consumer confusion and the added costs from having more than one scheme. Analysis of the complaints received by the EGCC Scheme in 2008 shows that 13.5% of complaints and 29.3% of investigations involve two companies – either a lines company and retail company (such as quality of supply issues, network connections) or two retail companies (switching or disconnections). If the companies belong to different schemes, this would introduce operational complexities, extended resolution times, increased costs and company and consumer frustration.

Although the vote on changes the governance structure failed in part, feedback from the majority of members is that they do not favour regulation and they continue to support the EGCC scheme.

If we can assist with any further information, please let us know.

Yours sincerely

A handwritten signature in black ink that reads "Richard Janes". The signature is written in a cursive style with a large, looping 'J' at the end.

Richard Janes
Independent Chair
Electricity and Gas Complaints Commission