


Office of the Ombudsmen
Te Tari -o- Ngā Kaitiaki Mana Tangata

20 April 2009

SUBMISSION TO THE ELECTRICITY COMMISSION ON THE PROPOSAL TO APPROVE A JOINT ELECTRICITY AND GAS COMPLAINTS RESOLUTION SCHEME.

I have confined my comments to what I see as the most important issues to be addressed.

Q1: Do you agree that the EGCC Scheme arrangements represent an appropriate basis for a single nationwide complaints resolution scheme for electricity and gas?

Comment: Yes. Where such entities exist in New Zealand and in other jurisdictions they facilitate a consistent approach to complaints resolution and easy access for the public by providing a single point of contact.

Q2: Do you have particular areas of concern that would lead you to making suggestions for changes to the EGCC Scheme?

Comment: No. The proposed amendment to the governance structure is sensible and will facilitate decision making around rule or process changes when these are necessary in the light of experience or practicality. Otherwise, the existing scheme has proved its usefulness and professionalism of approach. It adheres to the benchmarks to which all Ombudsman and other dispute resolution schemes subscribe in this region thus providing a good basis for reviews of comparative efficiency and effectiveness.

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?

Comment: Approval should be on the basis of an indefinite term. This encourages continuity, maintains institutional knowledge and experience and the development and retention of experienced and capable staff.

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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?

Comment: It should be as seamless as possible and all industry service providers must be signed up to it. One of the results of the a well functioning complaints resolution scheme is that it engenders trust in the industry.

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

Comment: 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?

Comment: Yes. In any event, the effectiveness of the Scheme is overseen by the governing body which will monitor costs and administrative efficiency, and as with other such schemes, a regular review (normally every 5 years, but in this case every 3 years) will establish both industry and consumer views on how the scheme is performing against the benchmark criteria.



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Chief Ombudsman