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POWERCO

Submission on Approval of a Complaints Resolution Scheme

1. Powerco thanks the Electricity Commission and the Gas Industry Company for the opportunity to make a submission on the consultation paper *Approval of a Joint Electricity and Gas Complaints Resolution Scheme*, dated March 2009 ("Consultation Paper").
2. Powerco's submissions are made in the attached Appendix in the recommended format set out in Appendix A to the Consultation Paper.
3. Powerco supports the approval of a single, independent complaints resolution scheme that is provided by the industry and believes that this would be significantly more efficient than the establishment of a new scheme by regulation.
4. Powerco was disappointed that the further amendments proposed by the Electricity and Gas Complaints Commission ("EGCC") to its Scheme have not been approved by the requisite majority. Powerco supports the approval of the EGCC as the approved scheme and hopes that these issues can be resolved.
5. Please do not hesitate to contact me if you have any questions.

Yours sincerely



Paul Goodeve

Regulatory and Business Manager

APPENDIX

Submission prepared by: Powerco Limited
Contact: Paul Goodeve, paul.goodeve@powerco.co.nz

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?	Agree.
Q2: Do you have particular areas of concern that would lead you to making suggestions for changes to the EGCC Scheme?	No (aside from the issues around approval of the further amendments to the EGCC Scheme).
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?	Agree. The time and costs involved in reapplying for approval after a set number of years would be prohibitive. If the approved scheme is not performing, this should be identified through the review process and corrected by the Regulators (with revocation of approval being an option for continuing poor performance).
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, particularly given the large number of existing members, who are familiar with the scheme, and the experience of the EGCC in dealing with dispute resolution in the energy industry. It may be appropriate for current complaints being handled by other schemes to be resolved to completion or be progressed to a point at which they are easily able to be transferred to the approved scheme during the transition period.
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?	Agree.
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?	Agree.
Q7: Do you agree that the simple scoring system set out in the table is a reasonable way of	Agree.

comparing costs and benefits across the options?	
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?	Agree.
Q9: Do you agree that the Approved Scheme option (approving the EGCC Scheme) is the best of the reasonably practicable options?	Agree.
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?	Agree.

OTHER ISSUES (note achievement standard number if appropriate)	COMMENT
	No further comments.

