

## NZ Association of Citizens Advice Bureaux (CAB)

### Feedback on Consultation of Approval Method for consumer complaints resolution schemes (CCRS)

*Submission is a summary taken from verbal submission given by Louise May, Social Policy Manager, CAB, to Lisa White, Advisor Retail, Electricity Commission on 20 February 2007 at CAB offices at 75 Ghuznee Street.*

#### Feedback form 1:

Ref	Submission
1	<i>No comment</i>
2	<i>No comment</i>
3	See feedback form 2
4	<p>The CAB believes that the Electricity and Gas Complaints Commission (EGCC) scheme is very effective and that their preference would be for that one scheme to cover the whole country.</p> <p>In support of this the following was noted:</p> <ul style="list-style-type: none"><li>• Since the EGCC was established CAB bureaux workers have noted a marked drop-off in electricity related complaints.</li><li>• The Association National Office has received unprompted feedback from CAB volunteers about the helpfulness of the EGCC scheme. Volunteers find the EGCC staff to be polite and helpful and their advice useful and accurate.</li><li>• CAB clients have also commented (unprompted) on the usefulness of the scheme, including using the case studies posted on the EGCC which are helpful for giving clients an idea of how the EGCC process works and how to proceed with the issues they have with their electricity supplier.</li></ul>
5	<i>No comment</i>
6	<i>No comment</i>
7	<i>No comment</i>

## Feedback form 2:

Ref	Benchmark criteria	Achievement standard
1.1		1.1 b) and c) 'notice in member invoices and on members websites' should be compulsory not an option within the 'three or more'
1.3		Note that the current information provided by the EGCC is very good but needs to be in a wider range of languages
1.11		All resources and promotional material should highlight that the service is free. This is important for encouraging greater take up of the scheme
1.16	This puts the emphasis on the decision-maker having the discretion to decide if the case is presented in writing or verbally. Should be the complainant's choice.	
2.6		CAB supports the independence requirements of the entity
4.2		Written reports should also not include any other information that could identify the complainant
5.1b(i)		2 months is too long as the definition of 'reasonable time' for member organisations to resolve complaints before they are passed to the CCRS. Between 4 to 6 weeks should be the maximum period.
5.4		It should be made clear that member companies must advise complainant of the CCRS even if the complaint is frivolous or vexatious. This will provide the opportunity for complainants who disagree with their company's assessment to seek the opinion of an independent third party (the CCRS). If the CCRS deems it to be a complaint of

		substance then the case can proceed through the CCRS process as normal. If the CCRS agrees with the company's assessment, they can dismiss the case.
6.2		Note that \$20,000 is higher than current EGCC scheme – the CAB supports \$20,000 as a more appropriate figure.
6.7		The CAB supports requirements for the CCRS to ensure that member companies have appropriate internal complaint schemes and would like to see the CCRS having a role in providing guidance and monitoring of those internal schemes.

**Additional comment:** The CAB is very pleased that the consumer complaints schemes are to be compulsory.

The CAB advise that nothing in this submission is confidential and it can be posted on the Commission website.

*Agreed as an accurate account of CAB submission: Louise May – dated 28/02/07*