

5 March 2007

Jenny Walton  
Electricity Commission  
PO Box 10041  
**Wellington**

**By email:** [info@electricitycommission.govt.nz](mailto:info@electricitycommission.govt.nz)

Dear Jenny

**King Country Energy – response to consultation paper on “Approval method for consumer complaints resolution schemes”**

We refer to the consultation paper issued in December 2006 seeking submissions on the Electricity Commission’s proposed approval method for consumer complaints resolution schemes.

King Country Energy (KCE) is grateful for the opportunity to provide feedback. Please find attached our submission, which is in two parts:

- our response to the six questions posed in the first section of the paper; and
- our comments on the proposed benchmarks and achievement standards.

By way of summary, the key points in our submission are:

- (a) We support an approval process:
  - (i) with commonsense benchmarking and achievement standards that are flexible and ‘fit for purpose’; and
  - (ii) that gives applicants the opportunity to discuss issues raised by the Commission and agree solutions to enable approval to be granted in a timely fashion.
- (b) We support the Commission’s proposed “broad approach” to assessing applications for approval and allowing applicants to demonstrate other means of meeting applicable benchmarks;
- (c) We consider that the Commission should approve more than one scheme. This is consistent with relevant legislation; it is practical; and there are obvious benefits (for both consumers and industry participants) in having multiple schemes.
- (d) We support ongoing monitoring by the Commission in a focused and commonsense fashion.

We think it is appropriate for all involved in this process to bear in mind that the cost of implementing and operating consumer complaints schemes will be borne by consumers. We are strongly opposed to the creation of a complaints industry. We acknowledge that a robust external complaints scheme benefits both KCE and its customers but our aim is to provide this service in as focussed, efficient and cost-effective a manner as possible. This has been the key factor in the scheme proposed by King Country Electric Power Trust (KCEPT) and KCE.

Finally, please note that KCE's comments on the proposed benchmarks and achievement standards are entirely without prejudice to its application for approval of its complaints scheme. You should not regard any failure to comment on a particular benchmark or achievement as acceptance thereof.

We look forward to your response.

Yours sincerely

Kit Wilson  
General Manager  
King Country Energy