



**Vector Limited**  
101 Carlton Gore Road  
PO Box 99882, Newmarket  
Auckland, New Zealand  
[www.vector.co.nz](http://www.vector.co.nz)  
Corporate Telephone  
+64-9-978 7788  
Corporate Facsimile  
+64-9-978 7799

Jenny Walton  
Electricity Commission  
PO Box 10041  
Wellington

7 March 2007

### **SUBMISSION ON APPROVAL METHOD FOR CONSUMER COMPLAINTS RESOLUTION SCHEMES**

Vector welcomes the opportunity to submit on the Electricity Commission's consultation paper 'Approval method for consumer complaints resolution schemes' released for consultation in December 2006.

Vector fully endorses the current Electricity Gas Complaints Commission (EGCC) scheme that has been running since 2002. Membership of the EGCC scheme covers all but a couple of lines companies and retailers and it has operated well overall.

Vector believes there is strong merit in one consumer complaints resolution scheme. Issues of scale make it more advantageous to develop and enhance a single best practice, efficient shop than multiple schemes. With multiple schemes there is potential confusion for customers and landowners if the schemes are active for similar issues in the same geographical area. For example Horizon (as a lines company) belongs to EGCC but Todd (as a retailer) to another scheme. A lines company or retailer may also need to be a member of two schemes in order to manage customer complaints, which would clearly add cost. There is also the potential for issues with consistent rulings if a similar consumer complaint is managed differently by different schemes.

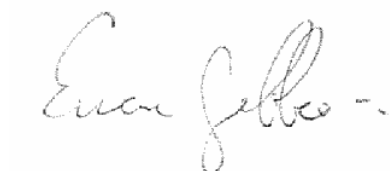
Further to this, a nationwide communications exercise around public awareness of a single scheme would be most effective. Communications on multiple schemes could cause confusion in overlapping areas. Multiple schemes are also not a cost effective option with the duplication of fixed costs.

The consultation paper discusses the use of benchmarks for monitoring. Vector believes the addition of achievement standards clearly sets out the way in which benchmark criteria can be achieved and provides a robust system for setting and monitoring the expectation of the scheme by the Electricity Commission.

Please see Appendix A for some specific comments on benchmark principles.

Thank you for considering this submission. If you have any queries, or require further information, please feel free to contact me at [ewan.gebbie@vector.co.nz](mailto:ewan.gebbie@vector.co.nz) or 04 462 8657.

Kind regards

A handwritten signature in black ink that reads "Ewan Gebbie". The signature is written in a cursive style with a small flourish at the end.

**Ewan Gebbie**

Group Manager Regulatory Performance

**Appendix A: Feedback form relating to specific benchmark criteria and achievement standards (Question 3)**

<b>Benchmark/benchmark criteria Reference</b>	<b>Feedback on benchmark criteria</b>	<b>Feedback on achievement standard</b>
1.22	The term 'legal representation' needs some clarification. Does discussion of cases with internal legal staff constitute legal representation? If so, are we then required to pay the complainants legal costs? We do not think that this is the intention of the standard. This may need to be worded differently.	
3.9	This needs to consider the management of sensitive or competitive information. Under the current EGCC scheme we have the ability to provide information to the EGCC but if identified as sensitive / competitive, this can not be handed forward to the complainant.	
5.5		Vector supports a three month timeframe for complaint resolution.