

3 March 2009

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Electricity and Gas Complaints Commission
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**SUBMISSION ON FURTHER CHANGES TO THE ELECTRICITY AND GAS
COMPLAINTS COMMISSIONER SCHEME**

1 Orion New Zealand Limited (**Orion**) welcomes the opportunity to comment on the proposals to make further changes to the Constitution for the Electricity and Gas Complaints Commissioner Scheme (the **EGCC Constitution**).

2 In general we support the proposals in the paper.

3 However, we are concerned about the proposed Principle CC4.1(a) which states that:

Council Members must treat any expression of dissatisfaction or concern about a service or a good provided by a Council Member as a Complaint.

4 This is an all encompassing statement, which we believe does not adequately reflect the reality of everyday interactions between customers and Council Members. It also fails to reflect that “complaints” relating to certain aspects of distributor’s business, such as pricing, are outside the scope of the EGCC Scheme.

5 We are very concerned that **any expression** of “dissatisfaction” or “concern” must be treated as a complaint.

6 Many of Orion’s policies and processes are a direct result of regulatory and legislative requirements. It is not uncommon for customers to react

negatively to these processes and requirements, particularly if they have little knowledge of the electricity industry. Many of these situations are resolved, sometimes through protracted discussion.

- 7 To require **all** concerns to be registered and monitored as complaints would impose significant administration costs, with little or no customer benefit.
- 8 We suggest that the principle needs to be limited to reflect an element of reasonableness, as a process of explanation and negotiation is inherent in many interactions between Council Members and Customers, and also to show that some “complaints” fall outside the scope of the EGCC Scheme.

Recommendation

- 9 We recommend that Principle CC4.1(a) be amended as follows:

Except to the extent limited elsewhere in the Scheme, Council Members must treat any reasonable expression of dissatisfaction or concern about a service or a good provided by a Council Member as a Complaint.

- 10 Thank you for the opportunity to make this submission. If you have any questions please contact Paddy Gregan, Education and Compliance Manager, DDI 03 363 9620, email paddy.gregan@oriongroup.co.nz.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paddy Gregan'.

Paddy Gregan
Education and Compliance Manager