



Vector Limited
101 Carlton Gore Road
PO Box 99882, Newmarket
Auckland, New Zealand
www.vector.co.nz
Corporate Telephone
+64-9-978 7788
Corporate Facsimile
+64-9-978 7799

Hellene Wallwork
Electricity and Gas Complaints Commission
PO Box 6144
Wellington

29 August 2008

SUBMISSION ON PROPOSAL TO CHANGE THE CONSTITUTION FOR THE ELECTRICITY AND GAS COMPLAINTS COMMISSIONER SCHEME

Vector welcomes the opportunity to submit on the proposal for changes to the scheme to comply with Electricity Commission (EC) and Gas Industry Co (GIC) requirements.

Overall Vector supports the proposed changes as we see they are necessary to meet the current suggested criteria by the EC and GIC for an approved scheme. If there are changes in the scope of the requirements for the scheme (due for release and consultation from the EC and GIC in September) we are happy to engage with you further on any other changes necessary to comply.

We have included some specific comment on the proposed changes as follows.

Terms of Reference

We support the shortening of the timeframe for recommendations and awards from 20 days to 15 days.

Codes of Practice

C23.1A & B and CA23.1A & B – This refers to a requirement for companies to include advice about their free internal complaints process, and information about the EGCC on “consumer invoices”.

We would appreciate clarification on what sort of invoices this refers to. Whilst Vector does not bill customers directly for consumption we do send invoices for many services performed on the network and sometimes even into customer's private property. Is it the intention that the EGCC wishes us to include complaint process information on these invoices? We would have a concern if this is the case as this could lead to a large number of out of jurisdiction complaints particularly

around price. Our preferred solution on this matter is that a definition of “consumer invoices” is established that avoids the potential for confusion regarding the jurisdiction of the EGCC, or simply identifies which specific invoices should be included under this definition.

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 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