



Wellington

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Electricity and Gas Complaints Commission
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Dear Hellene

We would like to thank you for visiting us and providing an informative and interesting overview of the EGCC scheme.

The following is our submission to the consultation document on the proposed amendments to the EGCC documents.

Question 1: Which changes to the scheme documents listed below DO NOT

- (a) meet the regulators' proposed scheme requirements
- (b) the recommendations from the Wood Report.
- (c) otherwise improve the efficiency and effectiveness of the scheme?

Answer:

We are satisfied that the proposed changes meet with the criteria.

Question 2: What other changes are required to be made to the scheme documents in order to comply with the regulators' proposed scheme requirements?

Answer:

We are satisfied that required changes are met by the proposed amendments.

Question 3: Given that membership of an approved scheme will be mandatory, is it appropriate to retain:

- (a) the ability for members to withdraw from the scheme? (see 3.13 -3.15)
- (b) the concept of and consequences for defaulting members (see definitions and clause 3.16 – 3.18 of the Deed)?

Answer:

(a) Yes. The ability to withdraw from the scheme should be retained however a member withdraws it must be reported to the regulators and to consumers.

(b) Yes.

Question 4: Given that membership of an approved scheme will be mandatory, is it appropriate to retain the Board's power to refuse to accept an application to join the scheme on the basis that the Board believes the applicant:

- (a) does not have the ability to carry out its obligations under the Constitution? (see clause 3.9(b))
- (b) does not have the ability to pay any entry fee or the annual levy the Board requires? (see clause 3.(9c))

Answer

Yes it is important for the credibility of the scheme to retain these provisions as removing them may create a disparity between members.

Yours sincerely
Wellington Community Law Centre



Frances Ah Mu
Community Lawyer