



New Zealand Association of
Citizens Advice Bureaux Inc
Ngā Pokapū Whakahoki Pātai mai i te Iwi Whānui

26 July 2004

Electricity Complaints Commission &
Gas Industry Steering Group
c/- Wendy Burke
Electricity Complaints Commission
PO Box 6144
WELLINGTON

Submission on the Incorporation of Gas Consumer Complaints into the Electricity Complaints Commissioner Scheme

Background

1. The New Zealand Association of Citizens Advice Bureaux – Ngā Pokapū Whakahoki Pātai mai i te Iwi Whānui welcomes the opportunity to comment on the proposal to incorporate gas consumer complaints into the existing Electricity Complaints Commissioner Scheme.

2. The aims of the Association are:

To ensure individuals do not suffer through ignorance of their rights and responsibilities or of the services available; or through an inability to express their needs effectively – Me noho matāra kia kua te tangata e mate i tōna kore mōhio ki ngā āhuatanga e āhei atu ana ia, ki ngāmahi rānei e tika ana kia mahia e ia, ki ngā ratonga rānei e āhei atu ana ia; i te kore rānei ōna e āhei ki te whakaputu i ōna hiahia kia mārama mai ai te tangata.

To exert a responsible influence on the development of social policies and services, both locally and nationally – Kia tino whawāhi atu ki te auahatanga o ngā kaupapa-ā-iwi me ngā ratonga-ā-rohe, puta noa hoki i te motu.

3. Citizens Advice Bureaux provide free, confidential and impartial information, advice, advocacy and support to individuals, and use our experience with clients to advocate for socially just policies and services in Aotearoa New Zealand.

4. The national network of 87 Citizens Advice Bureaux aim to empower individuals to deal with their own problems and to strengthen communities by identifying and raising local and national issues. The person to person information, advice, advocacy and support service provided by over 2,700 volunteers is unique in New Zealand, as is our ability to provide a national snapshot of community issues and concerns.

Comments on the Proposal

5. In making our comments we draw on the knowledge and experience from bureaux' client contact and the fact that we have dealt with around 29,000 energy and fuel related enquiries since 1998.

6. In our submission to the Commerce Select Committee on the Electricity and Gas Industries Bill in January of this year, we strongly recommended that the gas industry come under the existing electricity complaints scheme. Therefore, we support the Gas Industry Steering Group's proposal for incorporation of gas complaints into the Electricity Complaints Commissioner Scheme.

7. We agree that the revised title of the Electricity and Gas Complaints Commissioner Scheme should refer to Electricity and Gas, and not Energy, so as to avoid possible confusion for consumers about what is meant by the term energy.

8. The Association is pleased to note that the additional code for gas deals with dual consumer contracts where a company supplies both electricity and gas to a consumer.

9. We support the requirement in Schedule CA, Gas Consumer Code (of the revised draft Constitution) for accessible, easily understood language in the Code. A Code that is easy to read and to navigate will benefit the consumer and our bureau volunteers, who provide information, advocacy and support services to the public including on consumer issues relating to electricity and gas.

10. The Association supports clause CA19.2, which requires gas companies to advise consumers on how to turn off their gas in an emergency. The clause mentions the possible use of consumer contract, brochures and advertisements to convey this advice to consumers. We suggest that thought should be given to ensuring this information reaches and is understood by consumers who are not proficient in the English language, particularly in the written form. The Citizens Advice service is used by many different groups within our society, including new migrants to New Zealand. Through our contact with these groups, we are aware of the need for important public information to be conveyed in forms that are accessible to non-English speakers and those for whom English is not their first language. Advice relating to safety issues within the home, such as how to turn off the household gas supply, must be conveyed to all consumers regardless of their language skills.

11. We support the requirement that the Electricity Company Council members and the Gas Company Council members must be mindful of the need for consistency, where appropriate, between the dispute resolution protocols for both electricity and for gas (clause 7.11a). This will be particularly important for aiding consumer understanding of and trust in the dispute resolution processes. It is also important for those acting in a support or advocacy capacity for consumers such as our bureaux workers.

12. We are pleased to note the requirement (CA14 re Billing) for dual energy consumer contracts to itemise separately the amounts payable for electricity and for gas. This will have the effect of increasing transparency where this is not already standard practice and it will assist consumers with their household budgeting.

Conclusion

13. The Association welcomes the proposed Electricity and Gas Consumer Complaints Commissioner Scheme and endorses the amendments to the Constitution for the Electricity Complaints Commissioner Scheme.

14. The Association recommends that thought is given to ensuring the safety information referred to in clause CA19.2 is required to be presented in forms that can be understood by consumers who are not proficient in the English language, particularly in the written form.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Nick Toonen', written in a cursive style.

Nick Toonen
Chief Executive