

2 November 2007

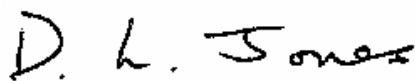
Review of Codes of Practice
Electricity and Gas Complaints Commission
PO Box 6144
Wellington

By email: f.day@egcomplaints.co.nz

SUBMISSION ON REVIEW OF THE ELECTRICITY CONSUMER CODE OF PRACTICE AND THE GAS CONSUMER CODE OF PRACTICE

- 1 Orion welcomes the opportunity to submit on the paper recently released by the Electricity and Gas Complaints Commission (the *Commission*) – the *review of the Electricity Consumer code of Practice and the Gas Consumer Code of Practice consultation paper* (the *paper*).
- 2 Orion's submission comprises a response to the Commissions specific questions raised in the paper, which we set out in the schedule to this letter.
- 3 Thank you for the opportunity to make this submission. If you have any questions, please contact Dennis Jones (Industry Developments Manager) DDI 03 363 9526, email dennis.jones@oriongroup.co.nz.

Yours sincerely



Dennis Jones
Industry Developments Manager

Schedule 1 – Answers to the Commission’s specific questions

Question	Relevant Clause in Code	Comment Where possible, please include details about the number and source of complaints that have lead to the concern.
Q1. Do we need the Electricity and/ Gas Codes? If so, how do you see them working with guidelines that are created by the Electricity Commission and Gas Industry Company? For example, the electricity model retail contract.		Yes. We consider that the Code of Practice was useful in informing the Electricity Commission’s (EC) model use of system agreements. The EC’s model’ can be changed by negotiation whereas the Code of Practice forms a non-negotiable base set of standard of service.
Q2. Are the Electricity and/ Gas Codes working well?		Orion has not experienced any problems with the Electricity Codes and they appear to us to be working well.
Q3. Are there any clauses in the Codes that promise more than can reasonably be delivered?		Orion has not experienced any problems with the clauses in the Codes promising more that can be delivered.
Q4. Are there any clauses in the Codes that are vague or ambiguous?		We have not experienced any problems with understanding the codes.
Q5. Should complaints handling by the Electricity and Gas Complaints Commissioner always be free to consumers? Are there some circumstances where a charge is appropriate such as where a meter undergoes testing or voltage variation is recorded?		We consider that the complaint system should be free to consumers as is currently provided for. However, we do consider that there are situations (such as metering or power quality issues) where the right to charge for testing in the event that the equipment is found to be operating to the required standard should be available. It is essential however that the customer should be made aware of the possible charge and whether it will be applied in advance.
Q6. Would it be useful if the Codes included an explanation of the purpose of some or all of the clauses? If so, which ones in particular?		Orion considers that it would be useful to maintain an explanation of the original intent behind a particular code. However we do not feel that this should be included with the codes as this may make the document unnecessarily complex and large.

Q7. Are there examples of changed industry duties and practice that should be incorporated into the Electricity and/ Gas Codes?		The additional requirements relating to disconnection of electricity supply recently introduced could be an issue to include in the codes of practice.
Q8. What other changes should be made to the Codes? Please provide reasons why you think the changes should be made.		Orion is comfortable with the codes as they currently exist.
Q9. Are there any other matters that you wish to raise?		No.
Q10. Please tell us how you first became aware of the Codes and the associated issues.		Orion was a founder member of the electricity complaints scheme and worked to develop the codes.
Q11. How do you think consumers usually become aware of the Codes? Do you have any specific suggestions as to how consumer awareness of the codes can be broadened?		Orion has copies of the codes and makes them available to customers on request. This would normally occur in response to a customer who may be considering making a complaint.