



**National Council of
Women of New Zealand**

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Wahine O Aotearoa

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**Submission to Chen Palmer and Partners on the
Independent Review of the Electricity Complaints Commission
Code of Practice**

Introduction

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 42 nationally organised societies. It has 34 branches spread throughout the country to which women from some 150 societies are affiliated.

NCWNZ appreciates the opportunity to participate in this review of the Electricity Complaints Commission Code of Practice.

This submission has been prepared by members of the Consumer Affairs Standing Committee. As there has been insufficient time to consult the wider membership of NCWNZ, the committee has referred to the views expressed in a previous NCW submission on the Code of Practice for the Supply of Electricity to Consumers and on the establishment of the Electricity Ombudsman scheme.

Comments on the Electricity Complaints Commission Code of Practice

NCWNZ is generally supportive of the Code of Practice. In 1997 our organisation made a submission on the content of the Domestic Contract Code of Practice for electricity supply companies and in 2000, in a submission on Proposals for the Establishment of an Ombudsman for the Electricity Industry, we reiterated the high priority we gave to such a Code and made suggestions for change.

Para 35 (a), (b), (c), (d) page 6:

Although the Commission's constitution requires a review to be carried out twelve months after the adoption of the Code in August 2001, it is less than a year since the Commissioner was appointed and even less since the official opening of the Commissioner's office in May 2002. With the backlog of complaints the Commissioner's office has had to deal with, there has been little opportunity to inform the public about the usefulness of the Code of Practice. It is our view that this review is therefore premature and very little reliable information will be available about how the Code is working. Given the greater length of notice of the wider review to be held in two years time, NCWNZ would be able to canvass the opinion of its entire membership who will by then have more experience of the whole scheme.

Para 35, (e), page 6: Matters that should be added to the code -

Bonds: C 12.1, bullet point 2

"The bond is not to be more than the expected loss if a consumer doesn't pay".

This point is too vague and we would like to see more clarity for both the consumer and the power company. We suggest that the bond should not be set at more than the estimate of the consumer's bill for, say, two months.





Obligations from point of supply: C 16.2

The consumer is to be responsible "for the maintenance of trees ... where this could affect the supply." Again this is vague. We suggest 'trimming or removal of trees' would more specifically state the responsibility of consumers.

Definitions: C 24

We would like to see these definitions placed at the beginning of the Code as is usual practice in these documents. Alternatively, there could be a note near the beginning to direct readers to the definitions. With the present format, readers have no idea that a set of definitions is available for reference until they get to the end of the Code.

NCWNZ would like to be informed about the outcome of this review and request a copy of the findings which we note are to be publicly available.

Beryl Anderson
National President

Liz King
Convener, Consumer Affairs Standing Committee