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11 May 2006

Gael Webster
Gas Industry Company Ltd
PO Box 10 646
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Dear Ms Webster

Submission on Compliance and Enforcement Arrangements in the NZ Gas Industry

Thank you for the opportunity to comment on the *Compliance and Enforcement Arrangements in the New Zealand Gas Industry* consultation paper dated 12 April 2006. My comments are from the perspective of commissioner of the Electricity and Gas Complaints Commissioner Scheme, an independent dispute resolution mechanism for consumers of electricity and gas. My views do not necessarily reflect those of the Electricity and Gas Complaints Commission or members of the scheme.

I note the comment made in paragraph 8.39 that any third party rights will need to be designed carefully to ensure that the jurisdiction between the compliance and enforcement regime and any rights of complaint under a consumers' complaint service do not overlap inefficiently.

It is my experience working with electricity complaints that from time to time my Office becomes aware of an alleged rule breach by a member company during the investigation of a consumer complaint. Complaints by customers involving switching of gas suppliers will involve the same issue. The development of a protocol for dealing with common jurisdiction between our two offices would seem to be an appropriate approach to ensure both resolution of the consumer complaint and dealing with the rule breach by the supplier.

Yours sincerely

Judi Jones
Electricity and Gas Complaints Commissioner