



24 July 2014

Hon Heather Roy
Independent Chair
Electricity and Gas Complaints Commissioner
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TRUSTPOWER SUBMISSION: SCHEME AMENDMENTS – LPG IN CYLINDERS

Trustpower Limited (Trustpower) welcomes the opportunity to provide a submission to the Electricity and Gas and Complaint Commissioner (EGCC) on its *Proposed amendments to the Scheme document: LPG in cylinders* consultation paper (the Consultation Paper).

Our answers to the specific questions posed in the Consultation Paper are attached in Appendix A. We are mostly in agreement with the EGCC on the issues identified in this paper.

For any questions relating to the material in this submission, please contact me on 07 572 9888.

Regards,

A handwritten signature in blue ink, appearing to read "J. Tipping".

JAMES TIPPING
REGULATORY STRATEGY MANAGER

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Appendix A: Responses to consultation questions

Question	Response
1. Do you agree with the Board’s proposal that the Commissioner have jurisdiction to consider complaints about LPG in cylinders?	1.1 Yes
2. Do you agree with the proposed changes to the definition of gas in the interpretation section?	2.1 Yes
3. Do you agree with the proposed effective date for considering complaints about LPG in cylinders (clause B.6.4)?	3.1 Yes
4. Do you agree with the removal of “Consumer” from clauses D.9, F.15 and F.17?	4.1 Yes
5. Do you have any other comments you would like the Board to consider about the proposed changes for LPG in cylinders?	<p>5.1 Within 6 months of the starting date for considering complaints (relating to LPG in cylinders), we would encourage the Commissioner to publish details on the quantities and types of LPG complaints, and issue guidelines on complaint-handling procedures (alongside relevant LPG case studies). This will enable the industry to learn from early decisions, and respond proactively by refining processes.</p> <p>5.2 We consider that the Consultation Paper could have been improved by establishing the rationale for the proposed changes, and describing how the Scheme’s guiding principles will be maintained more effectively.</p> <p>5.3 Regarding cost structure and how this in turn would influence members’ decision-making, it is worth noting that LPG is a low-margin business. Total customer charges are typically in the region of \$400-\$800 per</p>

	<p>annum. As a result, this requires a retailer's dispute-resolution process (including the Complaints Scheme) to be highly effective and efficient. The cost of undertaking the process must be worthwhile economically.</p> <p>5.4 We would also like to see a clear outline of the demarcation between the respective responsibilities of the retailer and consumer. For example, the outline could spell out clearly that the retailer is responsible for the bottle, and the consumer is responsible for the associated fixtures and fittings.</p>
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