



# NERC COMPLAINT HANDLING PROCESS AND STRATEGY

## NARUC/NERC PARTNERSHIP



**USAID**  
FROM THE AMERICAN PEOPLE



National  
Association of  
Regulatory  
Utility  
Commissioners

# **CONTENTS**

- **COMMISSION'S MANDATE**
- **CONSUMER PROTECTION REGULATIONS**
- **OVERVIEW OF COMPLAINTS STRUCTURE**
- **CUSTOMER COMPLAINT HANDLING PROCEDURES ESTABLISHED BY NERC**
  - **ESTABLISHMENT OF CUSTOMER COMPLAINTS UNITS – MINIMUM REQUIREMENT AND PROCEDURES**
  - **FORUM /FORUM APPEAL PROCEDURES**
  - **APPEAL TO NERC**
- **STRATEGIES FOR IMPLEMENTATION OF CCHP**
- **CHALLENGES**
- **CONCLUSION**

# ***MANDATE OF THE COMMISSION: EPSR ACT 2005***

- **S 80 provides for the development of the following, inter alia, instruments for Customer Protection:**
  - Customer Service Standards
  - Customer Complaints Handling Standards and Procedures
  - Codes of Practice to assist special needs customers (disabled, elderly or severely ill)
  - Procedures for assisting customers with difficulty in paying bills
  - Procedures for applying for electricity service
  - Procedures for disconnecting non-paying customers
  - Information to consumers and the manner of dissemination
- Standards for compensation to consumers who do not enjoy regular power supply.
- Standards on connection, safety, reliability of supply, technical codes and manuals.



# CONSUMER PROTECTION REGULATIONS

## **Customer Complaints Handling; Standards and Procedures:**

1. Setting framework for complaints redress
2. Customer Focused Structures
3. Clear Appeal Process
4. Clear Monitoring by NERC

## **Connection and Disconnection Procedures for Electricity Services:**

1. Standards and Procedures for Connection
2. Documentation Requirements
3. Disconnection Procedures



# CONSUMER PROTECTION REGULATIONS

## **Customer Service Standards of Performance for Distribution Companies:**

1. Minimum Service Standards
2. Duration for Fault Clearing
3. Obligations on Meter Installations
4. Replacement of Faulty Equipment like Fuses

## **Meter Reading, Billing, Cash Collection and Credit Management for Electricity Supplies:**

1. Procedures For Accurate Meter Reading
2. Correct Billing
3. Adjustment of Bills
4. Handling Estimated Bills



# OVERVIEW OF CUSTOMER COMPLAINTS HANDLING PROCEDURES

- **Objectives:**
  - To establish institutional framework for addressing Customer complaints
  - To ensure customer satisfaction by creating other avenues of redressing complaints not properly handled at Distribution company level



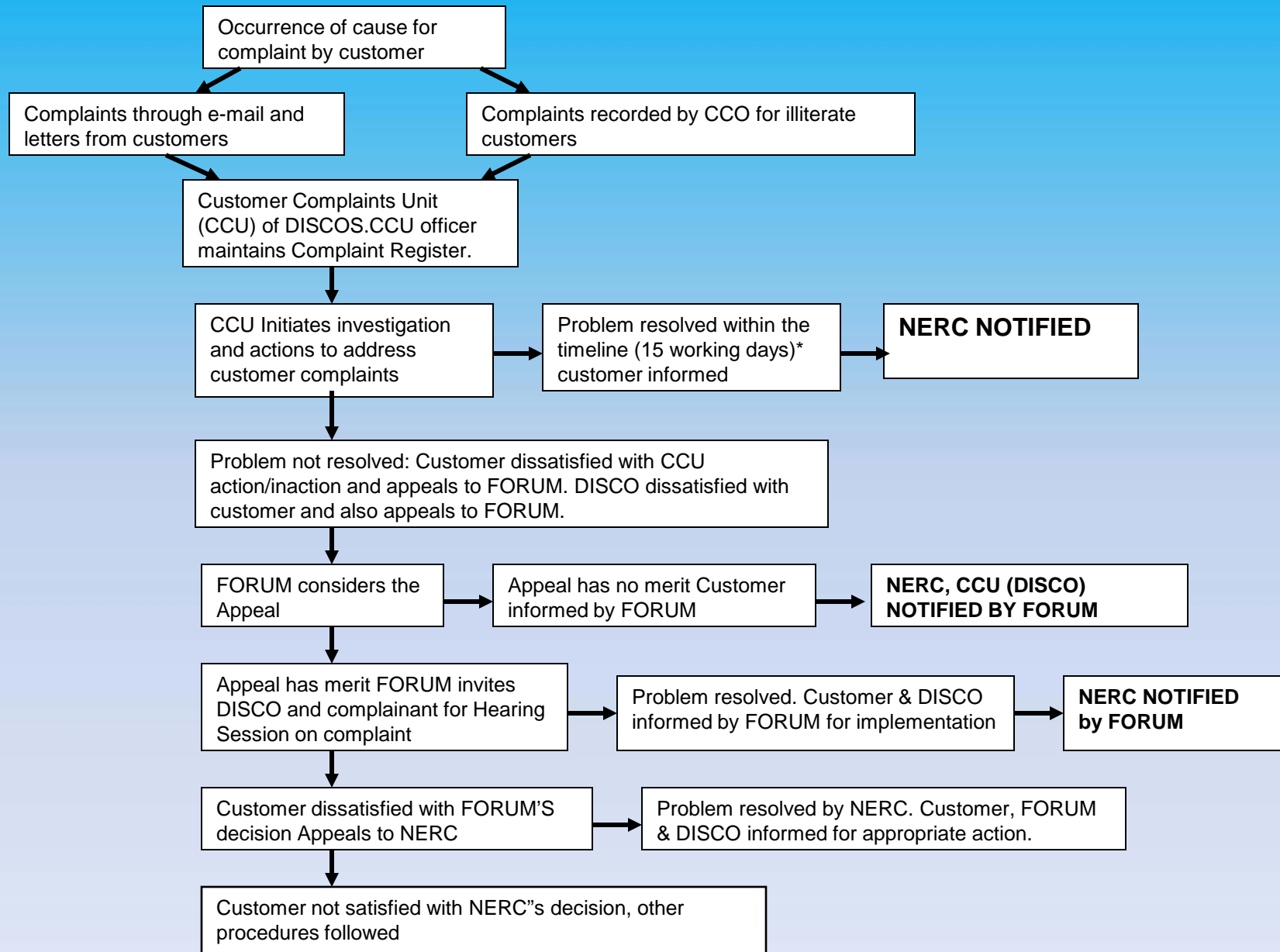
# **CUSTOMER COMPLAINT HANDLING AS ESTABLISHED BY NERC**

Customer Complaint Handling: Standards and Procedure (CCHSP) Regulation stipulates the process for handling Electricity consumers complaints. The procedure has three (3) different levels. A 3-tier redress mechanism

- Resolution at the Customer Complaint Units (situated at Distribution Companies' offices)
- Resolution and appeal at the Forum (Established by NERC in Distribution Companies' operating/coverage areas)
- Appeal at the Commission (NERC)



# DISCO CUSTOMER COMPLAINTS PROCEDURE FLOW CHART



*\* The timeline depends on the nature of the complaint*



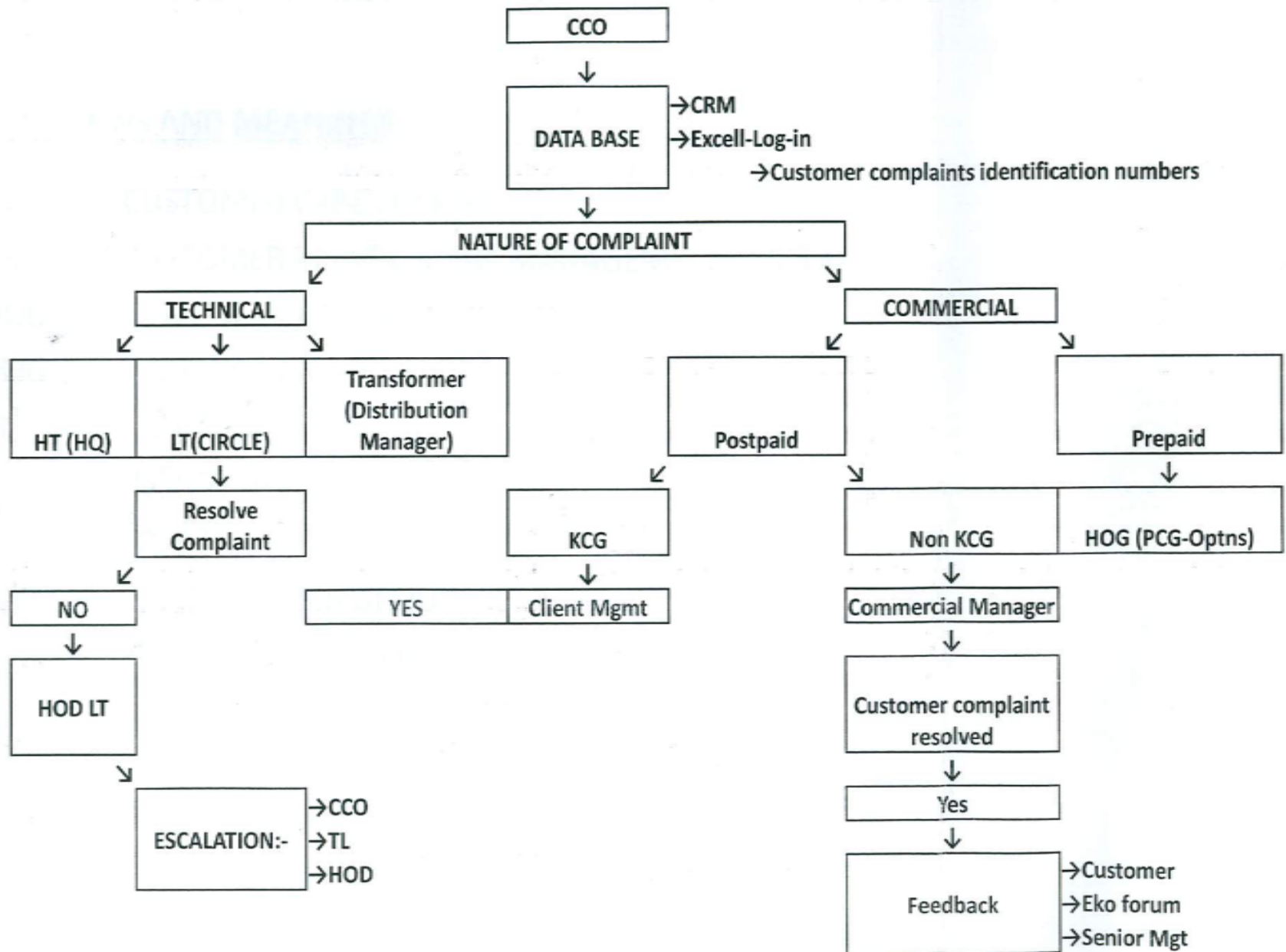
# **ESTABLISHMENT OF CUSTOMER COMPLAINTS UNITS – MINIMUM REQUIREMENT.**

- Customer Complaint handling: Standards and Procedures Regulation Sect. 3(1-10) specifies minimum requirement for establishment and functioning of Customer Complaint Units (CCU).
- Required the establishment of at least one CCU. However DISCOS may establish more than one in different locations within its operational area depending on the volume of complaints.
- Headed by a senior officer of the DISCO – Customer Complaints Officer (CCO) and staffed by DISCO staff.
- Complaints must be handled in accordance with Distribution Company's own written Complaints Procedure as approved by NERC.



# **DISTRIBUTION COMPANY CUSTOMER COMPLAINTS REPORTING STRUCTURE**





# **DISCO CCU CUSTOMER COMPLAINTS PROCEDURE**

- Complaints must be In writing (Including e-mail)
- “Customer Complaints Officer” CCO will write “Statement of Complaint” for non-literate customers
- Complaints must be advised of progress at least every 15 working days
- Any customer dissatisfied with outcome or where the resolution of complaint is delayed can appeal to ‘FORUM’
- The Distribution Company may also refer a complaint to The ‘FORUM’
- Bills issued to customers should contain the contact information of the FORUM and an advise to the customer to direct any complaint not satisfactorily handled at the DISCO CCU to the ‘FORUM’

# XYZ DISTRIBUTION COMPANY

## MONTHLY COMPLAINTS REPORT

DISCO Name	Business Unit	Complaints at the Beginning of the Month	No. of Complaints Received During the month	Time Duration for resolving complaints during the month (Max/ Avg/ Min) (Days and Night)	No. of Complaints under column (B) that are resolved	No of Complaints under column (C) that are resolved	No. of Complaints pending at the end of the month (By category of Complaints)					Total	Remarks (Including reasons for non redress of complaints)
								More than 6 months	3-6 months	1-3 months	For 1 month		
A	B	C	D	E	F	G	H	I	J	K	L	M	N
							Categories of Complaints						
							1. Interruption						
							2. Voltage						
							3. Load Shedding						
							4. Meter						
							5. Billing						
							6. Disconnection						
							7. Delay in connection						
							8. Others						



# DISTRIBUTION COMPANY

## CUSTOMER COMPLAINTS REGISTER



S/NO	CUSTOMER DETAILS (NAME/ADDRESS) TEL./EMAIL	THE GRIEVANCE/ COMPLAINT/ OTHERS	COMPLAINTS O./ DATE OF RECEIPT	CONCERNED BUSINESS UNIT	ACTION TAKEN/DATE	MONTH.....YEAR	REMARKS
						RESOLUTION	

# TEMPLATE FOR MONITORING THE ESTABLISHMENT OF CCU WITHIN DISCOS



S/N	DESCRIPTION	OBSERVATION	COMMENTS
1	One – stop Customer Complaints Unit		
2	Central Head Office co-ordination at DISCO		
3	Computer Hardware <ul style="list-style-type: none"> <li>• Desktop(s) and Printer(s)</li> </ul>		
4	Customer Relationship Management (CRM) Software		
5	Customer Communications <ul style="list-style-type: none"> <li>• Telephone</li> <li>• Valid email address</li> </ul>		
6	Internet Connectivity <ul style="list-style-type: none"> <li>• Modem</li> <li>• Radio</li> <li>• VSAT</li> </ul>		
7	Furniture <ul style="list-style-type: none"> <li>• Comfortable seating arrangement</li> <li>• Information/Complaints Desk (s)</li> </ul>		
8	Ambience <ul style="list-style-type: none"> <li>• Air Conditioner</li> <li>• Curtains/Blinds</li> <li>• Flooring with Vitrified Tiles</li> <li>• Colour Television</li> <li>• Décor of Unit</li> </ul>		
9	Information materials  (DISCO/NERC) <ul style="list-style-type: none"> <li>• Posters <ul style="list-style-type: none"> <li>- Especially customers' rights and obligations as well as the Commission's Complaint handling flow chart conspicuously displayed.</li> </ul> </li> <li>• Newsletters</li> <li>• Fliers</li> <li>• Pamphlet <ul style="list-style-type: none"> <li>- Including printed copies of the DISCO's Complaint Procedures lodged with the Commission and freely distributed to customers</li> </ul> </li> </ul>		
10	Signboard <ul style="list-style-type: none"> <li>• CCU name and address</li> <li>• P.O. Box Address</li> <li>• Email address</li> <li>• Contact phone numbers</li> </ul>		

# THE FORUM



- NERC Has Established The FORUM in The Operational Areas of Distribution Companies.
- Secretariat And Administrative Support Are Provided By NERC.
- Office Space And Other Required Facilities Are Provided By Distribution Companies.
- The FORUM Shall Comprise of Five Part-Time Members:
  - Representative of Industrial Customers nominated by Manufacturers Association of Nigeria (MAN).
  - Representative of Commercial Customers nominated by Nigerian Association of Chambers of Commerce, Industry, Mining, and Agriculture (NACCIMA).
  - Representative of Residential Customers nominated by Consumer Protection Council (CPC).
  - An Electrical Engineer from Nigerian Society of Engineers (NSE) nominated by NERC.
  - Member from a Non-Governmental Organization (NGO) nominated by NERC.



# FORUM APPEALS PROCEDURE



- All appeals will be registered and acknowledged within 5 working days of receipt.
- All organizations acting on behalf of customers must provide written authority from the customer
- Whether to hear or reject an appeal must be made within 10 working days of receipt
  - Appeals will be rejected if the Forum decides that they are frivolous, vexatious, or lack merit
- Customers must be informed that their appeals have been rejected within 5 working days and may:
  - Re-submit application
  - Appeal to the Commission

# FUNCTION OF THE FORUM



- Resolve Customer complaints not attended to at DISCO level
- Reverse undue charges to an aggrieved party
- Prevent unfair business practices
- Give direction for the withdrawal of hazardous electrical services being offered
- Provide basis for compensating an aggrieved party

**Form 1: FORUM OFFICE****Registration of Appeal**

Appeal No: \_\_\_\_\_ (To be provided by office)

Reg. No. of Appellant at the CCU: (DISCO/CCU/Code No.):----- ( To be provided by office)

Date:-----

1. Name and address of appellant:-----

2. Telephone number (s) of appellant:-----

3. Type of dispute	Interruption (1)	Voltage (2)	Load Shedding (3)	Meter (4)	Billing (5)	Disconnection (6)	Delay in New Connection (7)	Others (8)

4. Brief description of dispute:-----

5. Any other relevant information:-----

6. Date of Appeal:-----Signature of Appellant:-----

-----Tear from here-----

**To be retained by Consumer**

Appeal No. &amp; Date \_\_\_\_\_ (To be provided by office)

i. Name of consumer:-----

ii. Brief description of dispute:-----

iii. Target date for resolving dispute:----- (To be provided by office)

Signature of staff receiving the application:-----

Designation &amp; Seal:-----

(Please provide your appeal number in any future communications)

# APPEALS TO NERC



- Both the Distribution Company and the customer have right of appeal to the Commission where dispute is unresolved by FORUM.
- Appeals must be submitted within 10 working days of the Forum's decision.
- The Commission shall not entertain an appeal by an appellant who, in terms of a decision by a Forum, is required to pay an amount to a Distribution Company unless that amount has been paid.

# STRATEGIES FOR IMPLEMENTATION OF CCHP



- Communication/Consumer Education:
  - Through Public Campaigns by both NERC and DISCOs (Power Consumer Assemblies – NERC Tool)
    - Development of Jingles. Content based on the provision of the Regulation on customer protection, rights and obligations, Dedicated Radio programmes
    - Social Media – Facebook, Twitter and Dedicated Email
    - Development of consumer Education materials - Flyers
- Monthly Interactive Sessions with CEOs
  - Focus on customer issues derived from trend analysis of monthly submissions.
- Quarterly Capacity building for Key Customer Service Staff of DISCOs
  - Focus on NERC Regulations, Orders and guidelines

# STRATEGIES FOR IMPLEMENTATION OF CCHP



- Auditing /Monitoring Compliance to service standards of DISCOs.
  - Development a methodology and mechanism for monitoring and enforcement of customer protection regulations
- Monitoring and participation at Consumer Consultative Meetings of Disco
  - Design framework on enlightenment campaigns and programmes for DISCOs
  - NERC monitors the consumer outreach programmes of DISCOs using a designated templates
- Mining and analysis of Monthly data on customer complaints submitted by DISCOs
  - Leverage on IT Tools for improved data collection and analysis
  - Creating/monitoring multi channels for complaints
    - Development of Regulations for Contact Centres Standards - DISCOs.

# CHALLENGES

- Proper implementation/performance of Discos' internal procedures
- Handling of slippages from the complaint mechanism
- Data manipulation
  - Credibility of data submitted by DISCOs.
- Monitoring compliance of Customer Protection Regulations
- Optimal operations of Forum offices: Its effectiveness on the complaint mechanism
- Implementation of the Forum decisions
  - Enforcement strategies for implementation of Forum decisions.

# CONCLUSION