



2024–2025 Annual Report

UDL has a simple and clear purpose – to sort complaints between utility providers and consumers through prevention, education and complaint resolution. We are independent and free to all consumers, and our mission is to be fast, fair and effective.



**UTILITIES
DISPUTES**
TAUTOHETOHE
WHAIPAINGA

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A message from the Chair

Tautohetohe Whaipanga | Utilities Disputes (UDL) has a simple, clear and useful purpose. For those with utility issues or concerns, we provide a free and independent service for resolving complaints. For utility providers, we support them in resolving complaints and help set standards for complaint resolution. I have been consistently impressed by the level of care and dedication the UDL whānau bring to their everyday work.

This is my first report as Chair of Tautohetohe Whaipanga | Utilities Disputes (UDL) and I am delighted to be able to contribute to the work and growth of this important organisation.

Our priority is to deliver New Zealand's leading dispute resolution service, and that requires us to provide outstanding support to consumers and providers.

While our core focus is resolving complaints, this is just one component of what UDL does. Our three core pillars: to prevent, educate, and resolve, inform everything we do, and we are always looking for areas where we can provide better value to consumers and providers.

While the majority of our work is assisting energy consumers, we are committed to growing our Water and Telecommunications Schemes. The providers that choose to join these schemes place trust in our impartiality, experience, and expertise in dispute resolution to help build trust between them and their customers. These schemes, alongside our Broadband Shared Property Access Dispute Scheme, allow us to cover all key utilities for consumers and providers across Aotearoa.



My thanks to my fellow Board members Tony Dench, Kevin Angland, Corey Hebbard and Ruth Smithers for their dedication over the past year and effort to support UDL and its work. I also want to thank departing Board member Kyle Christensen and former Chair the Hon Heather Roy, who gave me an expansive and expert handover.

My fellow board members and I want to thank and acknowledge the support we receive from our Advisory Committees, who provide invaluable insight into how we can best operate our schemes.

Finally, and most importantly, we also want to thank UDL Commissioner Neil Mallon, Deputy Commissioner Kalina Shipkov, and all the team at UDL who work so tirelessly to help kiwi consumers and provider.

A handwritten signature in white ink, reading 'Deborah Hart'.

Deborah Hart

Heamana | UDL Chair

A message from the Commissioner

Utilities Disputes makes a difference to the people of Aotearoa, resolving over 8,000 complaints in the past year.

In the past year UDL helped over twenty thousand Kiwis. We resolved more complaints than ever and experienced our fifth consecutive year of growth. Complaints and enquiries increased by 36% and we resolved 19% more complaints than the previous year.

This increase is a reflection of the difficult financial circumstances of many consumers as price increases place more pressure on the cost of living. It's reasonable to expect consumers will apply more scrutiny to their bills, and that they'll be more likely to raise a concern or complaint. We are in a privileged position to respond to these concerns and to help both consumers and providers to resolve them while maintaining a positive relationship.

We've made a number of changes to respond effectively to the increase in demand for our services. We've invested in our early resolution process so we can resolve complaints earlier.

We've also focused on improving our ability to issue decisions and increased our focus on identifying and reporting on systemic issues. We've increased our ability to produce meaningful data and factor it into the work we do. In the last year we shared more decisions with regulators and key stakeholders than ever before. This is complemented by monthly data reports and insights, and our first annual systemic insights report. This collaborative approach is allowing us to work together with our providers and stakeholders to improve the quality of service for everyone.



We commissioned two important pieces of research in the past year to increase our knowledge of the people we help, and the value we provide. The first was a piece of independent research and analysis on the economic benefit of our services to consumers and providers. This was undertaken by the New Zealand Institute of Economic Research. The second piece of research looked at consumers who comprise the 'squeezed middle' and the issues they face. This research was led by Martin Jenkins, providing valuable insights of the 1.4 million Kiwi consumers who identify as the squeezed middle, and how we can help them.

None of this work would have been possible without the amazing people working at UDL. An organisation is only as great as it's people, and I am fortunate to be able to work with an incredible bunch. I want to thank all of my staff for their hard work and support over the last year. I also want to thank the UDL Board for their continued guidance and support.

*Nā tō rourou, nā taku rourou ka ora ai te iwi.
With your food basket and my food basket,
the people will thrive.*

A black ink signature of Neil Mallon, written in a cursive style.

Neil Mallon

Toihau | Commissioner

Tumu Whakarae | Chief Executive Officer

Year at a glance

Here are some of our highlights from 2024–25.



**We're resolving
more complaints, and
resolving them sooner**

Complaints and queries

36%

increase in the number of
complaints and queries

2,961

complaint summaries produced
and sent to providers on behalf
of consumers

21,000 **194**

Kiwis called UDL to
access our services

decisions
written

Most common complaint issues

Complaints can have more than one issue

48%

Billing

37%

Customer service

11%

Supply

10%

Equipment

10%

Disconnection

Systemic issues

UDL produced its **first
systemic insight report**.

26

decisions referred to
external organisations

Social media

390K+

combined reach of
our social posts

How many consumers our schemes cover



ENERGY
**Every household and
business in Aotearoa**



BSPAD
**Every major fibre provider
and all the shared properties
that rely on them**



WATER
**Over 2 million consumers
across Aotearoa**



TELECOMMUNICATIONS
**Over 100,000 consumers
across Aotearoa**

Employer awards

Shortlisted for:

Best Place to Work
Small workplace

Wellington Gold Awards
Supporting Gold

Complaints

Background

UDL resolves complaints between utility providers and consumers. If a consumer has made a complaint to their provider the two parties cannot resolve, they can come to UDL to get it sorted. We work with both parties to find a fair resolution.

Our process can be separated into three key streams:

1. Intake: Our **First Contact** team receives all incoming complaints and enquiries. The First Contact team can refer queries and complaints to providers and will often set them out in writing on behalf of the complainant. The First Contact team will also refer consumers to other organisations if it's not an issue we can resolve. The team will also fast track urgent complaints where the consumer may suffer serious harm, for example those involving disconnections.
2. Deadlock: Deadlock Complaints are complaints that have already been made to the provider and remain unresolved after 20 working days¹. These complaints are referred to our **Early Resolution** team. They will work with the consumer and provider to try and resolve the complaint early in the process. If it can't be resolved, we may issue a Commissioner's decision to close the complaint. If it would not be correct to close the complaint, it will be accepted for further investigation.
3. Accepted: If the complaint has not been resolved through the above process, it can be accepted for further investigation. The **Conciliation & Investigation** team will then take it over. They can complete an in-depth investigation if required and they will continue to work with the complainant and provider to try and reach an agreement to resolve the complaint. Complaints reaching this stage are usually more complex and not suitable for early resolution. If they can't be resolved by agreement the Commissioner will issue a decision after deciding what is a fair and reasonable outcome.

We have continued to focus more resources and efforts on resolving complaints earlier. This is the evolution of a realignment in organisational structure in 2023 that led to the creation of the Early Resolution team. We've made changes to our annual reporting to better represent the impacts of this change. This is also our first full year of data gathered under the new CRM introduced in 2023.

This year's data is broken into four sections:

- 1 The Big Picture – details of all complaints and queries received and closed during the year
- 2 Intake – Complaints and Queries
- 3 Deadlock Complaints
- 4 Accepted Complaints.

¹ Some complaints can reach deadlock without being with the provider for 20 working days, as per our [Scheme Rules](#).

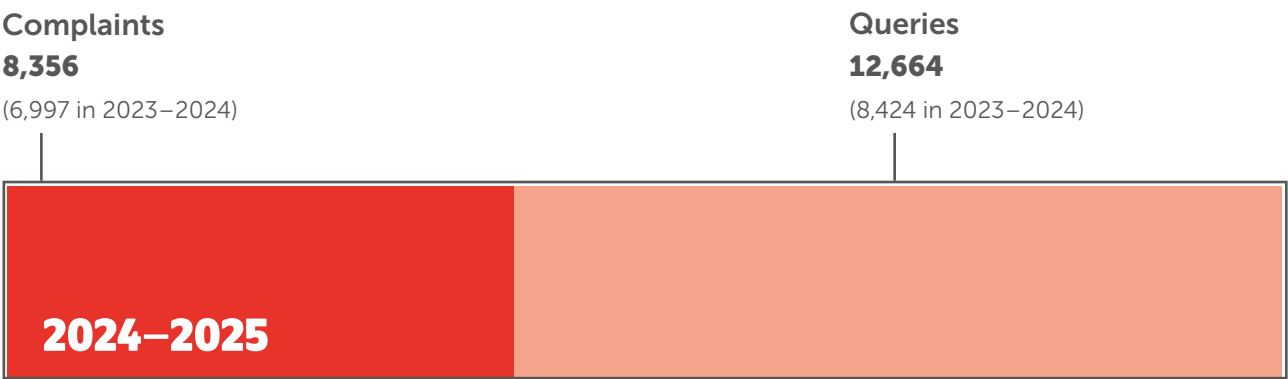
1

The big picture

At a glance:



Complaints and queries received



There was a 50.3% increase in queries received, and a 19.4% increase in complaints. These increases reflect the difficult conditions facing many consumers last year, and the growing awareness of UDL. This continues a trend of increased complaint numbers yearly since 2019–2020.

In depth:
We are sorting more complaints than ever before. During this year we received 21,020 queries and complaints across all schemes, compared to 15,421 last year.

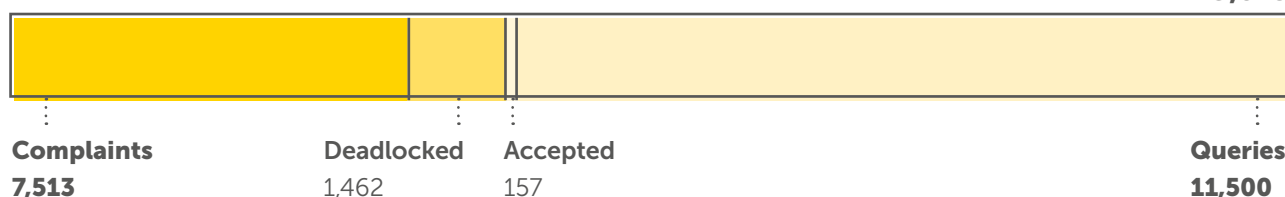
Complaints and queries received by scheme

Below is the breakdown of complaints and queries received by each scheme, compared to 2023–24. These graphs also show how far into UDL's process these complaints and queries progressed.

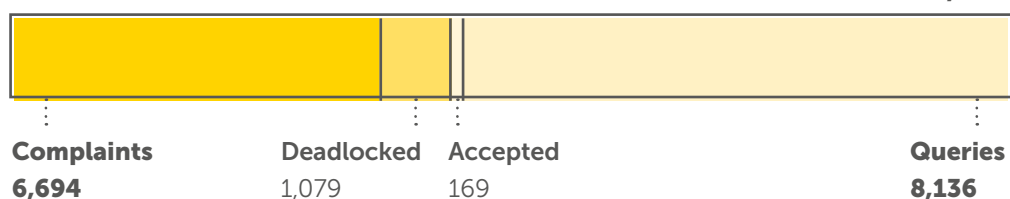
Energy



2024–2025

19,013


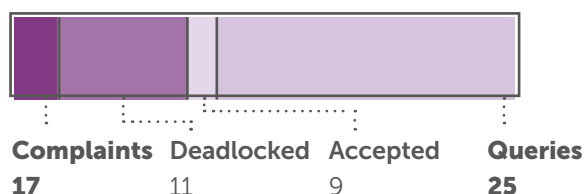
2023–2024

14,830


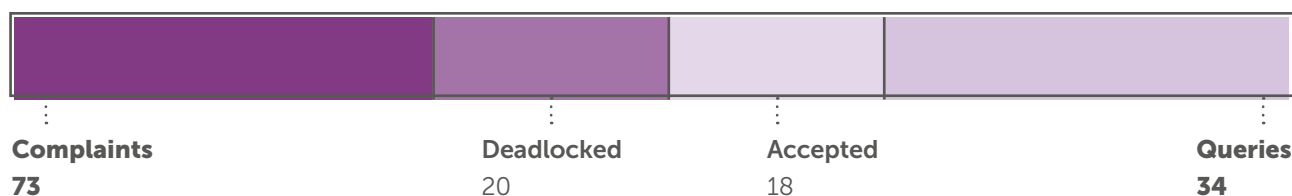
Broadband Shared Property Access Disputes



2024–2025

42


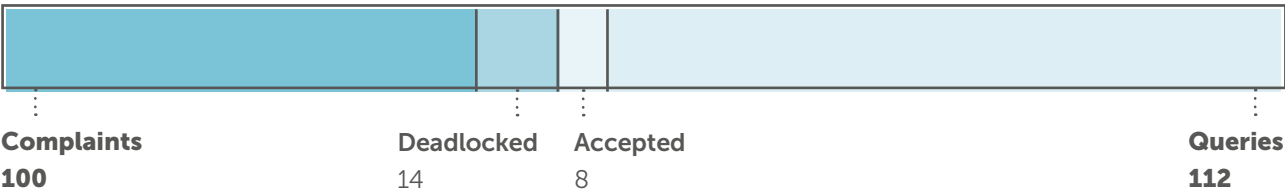
2023–2024

107


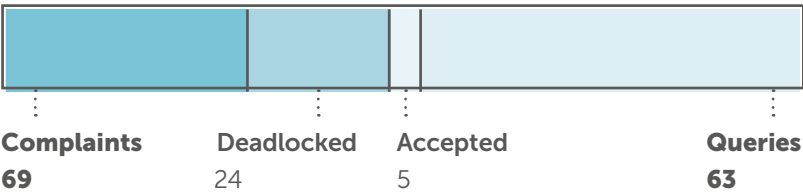
Water



2024–2025



2023–2024



Telecommunications



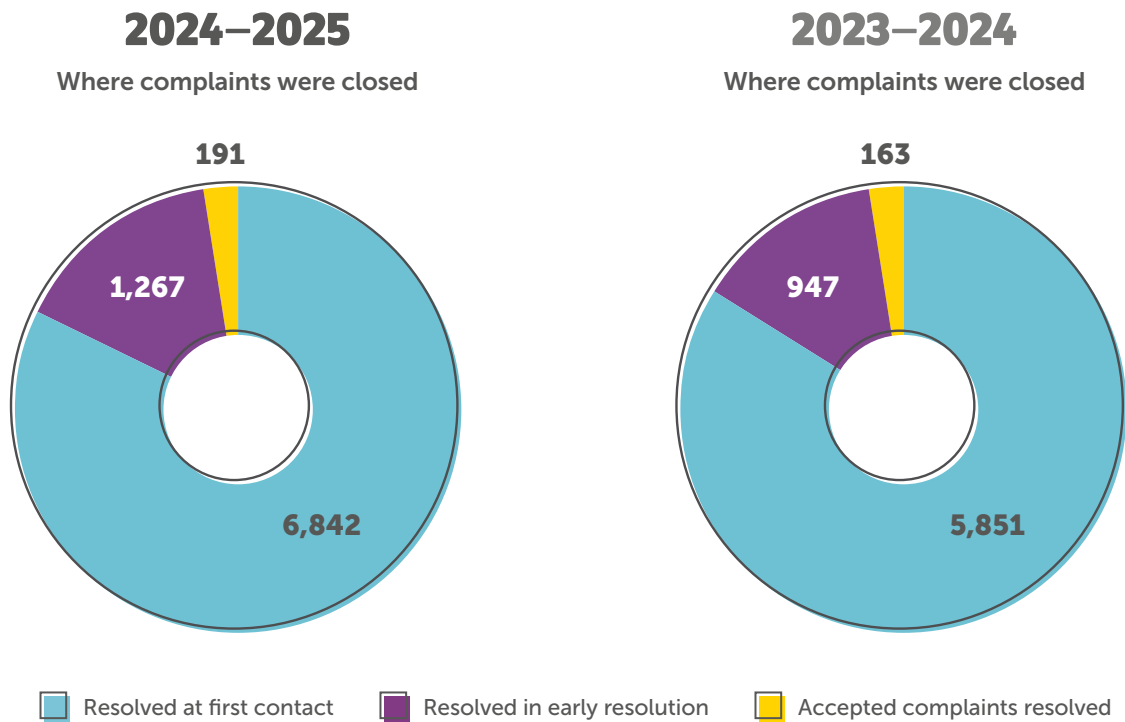
2024–2025



Complete numbers for the Telecommunications scheme over 2023–24 are not available.

Where complaints are closing

The proportion of complaints closed by Early Resolution increased by 1.7%, while the proportion closed at intake and following acceptance both fell. These numbers include complaints that began prior to the reporting year.

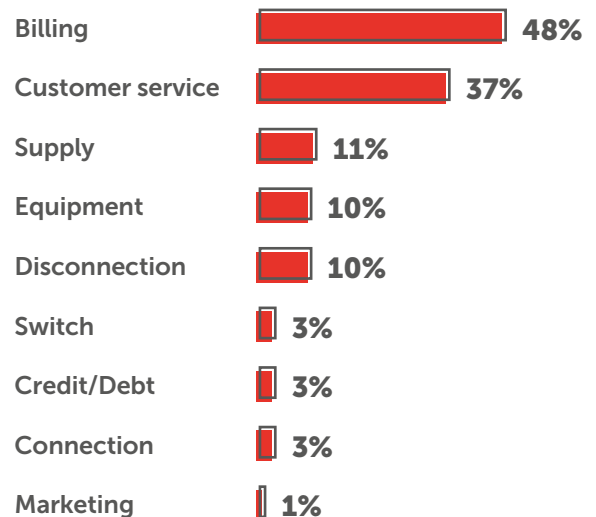


What complaints are about

We increased our tracking of complaint issues significantly last year. We record complaint issues down several tiers to get a clear idea of what the main issues of a complaint are, and so we can identify if issues are becoming more common. A single complaint can have several issues.

Tier 1 issues broadly cover what a complaint is about. As shown below, 48% of complaints include a billing issue as a component. Common billing issues include incorrectly high bills, large back bills, and unexplained fees.

TIER 1 ISSUES



(complaints can have more than 1 issue)

2

Complaints – Intake

Every case received by UDL starts at intake with our First Contact team.

At a glance:

21,020

complaints and queries received
(15,421 in 2023–2024)

8,356

complaints received
(6,997 in 2023–2024)

20%

increase in the number of Complaint Summaries produced

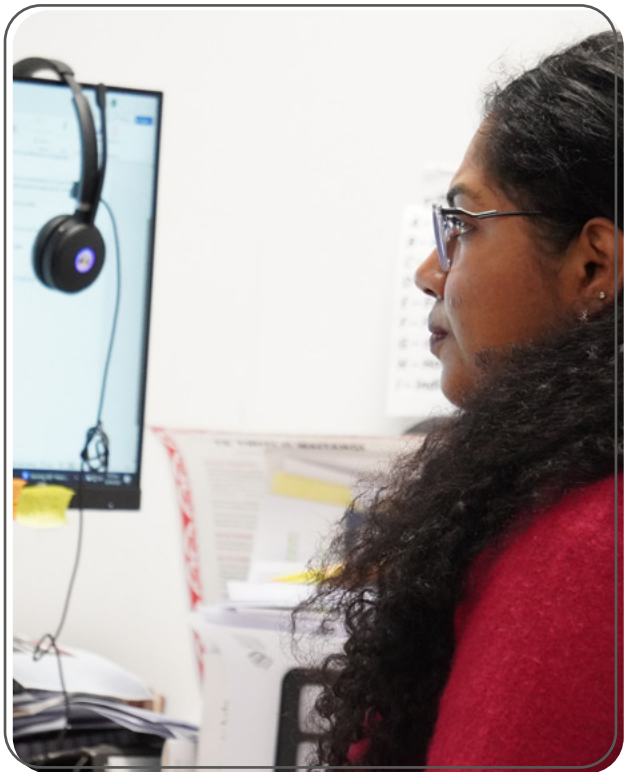
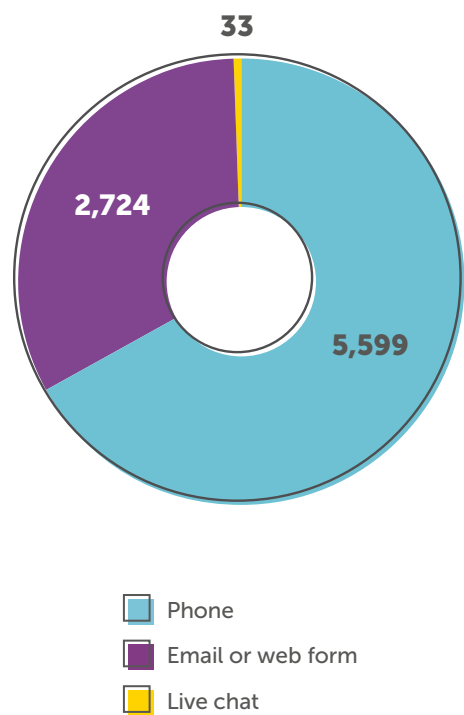
40-point

NPS improvement when a complaint summary is produced

In depth:

How complaints are received

How complaints are received



Complaint Summaries

One way we provide value at intake is by producing Complaint Summaries for consumers. These are written summaries of a consumer's complaint that is passed on to a providers complaint resolution team by UDL. They set out the details of a complaint succinctly and confirm the resolution the consumer is seeking. Complaint Summaries help resolve complaints early by identifying the issues for both sides so they can focus on resolving them. They also reduce the stress in complaining – one of the barriers that prevents people from getting issues sorted.

Complaint Summaries are valued by consumers and providers. This can be seen from the increased NPS score for complaints where Complaint Summaries were provided.

2,961

complaint summaries written

Resolutions

A crucial responsibility of the First Contact team is to identify which complaints need to be escalated. This typically happens when there is a potential disconnection or potential for the consumer to suffer serious harm. Where appropriate, the team will refer complainants to external organisations or provide a Complaint Summary so the complainant can first try and resolve the issue with their provider.

82.4%

of all complaints closed were resolved by the First Contact team

HOW COMPLAINTS WERE RESOLVED

Closed after referral

 37%

Complainant to contact provider themselves

 28.7%

Abandoned by complainant

 18.2%

Resolved through facilitation

 6.6%

Referred to another organisation

 5.7%

Complainant agreed to work with provider

 2.0%

Withdrawn by complainant

 1.8%

3

Complaints – Deadlock

At a glance:

1,502

complaints that reached
deadlock
(1,123 in 2023–2024)

34%

increase in the number of
deadlocked complaints

81.4%

of closed deadlocked
complaints were resolved
through facilitation

In depth:

A complaint reaches deadlock once it has been with the provider for 20 working days, or it would be otherwise inappropriate to wait longer.

Resolutions

When a complaint reaches deadlock, we will first try and resolve the complaint through facilitation. If we are unable to resolve it early, we may accept the complaint for further consideration.

Despite the number of deadlocked complaints increasing by 34%, the likelihood of a complaint needing to be accepted for consideration dropped by 5.6%. This can be attributed to the additional efforts being made to resolve complaints earlier in the process. This is shown in the 46% increase in the number of Commissioner Decisions that were issued before acceptance this year.

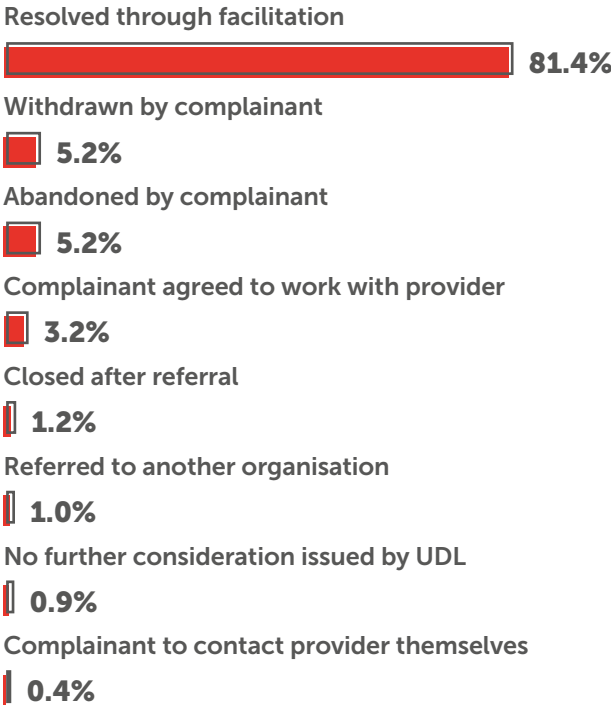
12.3%

of deadlocked complaints accepted
(17.9% in 2023–2024)

15.3%

of all complaints closed were resolved
by the Early Resolution team

HOW COMPLAINTS WERE RESOLVED



4

Complaints – Accepted

At a glance:

174

complaints accepted
(192 in 2023–2024)

53.1%

of accepted complaints
were resolved by
Commissioner’s Decision

10%

decrease in the number
of complaints accepted

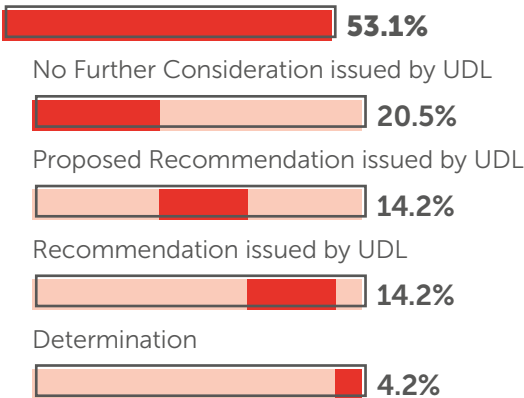
In depth:

Resolutions

If a complaint needs further investigation, we can accept it for consideration by the Conciliation and Investigation team. This team will still try and facilitate a solution and will also investigate the issues.

HOW COMPLAINTS WERE RESOLVED

Commissioner’s Decisions:



Resolved through facilitation



Withdrawn by complainant



Complainant agreed to work with provider



Abandoned by complainant



Referred to another organisation



2.3%

of all complaints closed were resolved
by the Conciliation and Investigation team

Most complaints are settled by Commissioner’s Decisions. The most common decision type is a No Further Consideration, which typically occurs when the Commissioner decides that the provider has already made a fair and reasonable offer to resolve the complaint.

The Early Resolution team can issue No Further Considerations while a complaint is at deadlock. The team will issue these when considering if a complaint should be accepted.

Number of decisions

2024–2025		2023–2024
66	No Further Consideration (at deadlock)	45
39	No Further Consideration (after accepted)	14
51	Proposed recommendation/preliminary determination	38
30	Recommendation	10
8	Determination	5

Complaints glossary

Queries

Where a consumer is simply seeking information or assistance or has contacted us in error (thinking they were calling their provider).

Complaints and disputes²

Includes an expression of dissatisfaction made to or about a provider where a response or a resolution is explicitly or implicitly expected. If the complaint is within 20 working days, we may carry out a three-way call or other dispute resolution method, provide a complaint summary or connect the consumer to their provider.

Deadlocked Complaints

A provider has 20 working days to resolve a complaint. If we are advised the complaint is not resolved after this period, it is described as being at "deadlock". At this stage we assess whether we have jurisdiction to accept it or whether there are grounds to take no further action perhaps because the provider has already made a fair and reasonable offer. A serious complaint such as a potential disconnection may be deadlocked without waiting for the 20-day period to expire. A provider is able to challenge jurisdiction when a complaint is at deadlock.

Resolved Deadlock Complaints

These are deadlocked complaints that have been resolved without being accepted. This can be for a number of reasons. An offer may have been made by the provider which the Commissioner decides provides a fair and reasonable outcome and a decision is issued to confirm this. The complaint may also be closed by agreement after UDL has facilitated a resolution.

Accepted Complaints

These are deadlocked complaints that are accepted as being within jurisdiction, suitable for investigation and are referred to the Conciliation and Investigation Team. If they cannot be resolved, the Commissioner will issue a decision.

² Includes disputes received under the BSPAD scheme.

The payment plan problem



When Holden opened an account with a new provider, J.D Energy, his first bill was higher than expected, so he contacted J.D Energy to let them know he was having payment difficulties.

Holden called J.D Energy a number of times to try and arrange a payment plan, but was told he needed to book an appointment through a separate channel and no plan was put in place to manage the debt.

Over the next two months, Holden contacted J.D Energy 8 times to try and make a manual payment towards his debt. Each time he was told to book an appointment through another channel.

Holden then received a disconnection notice from J.D Energy due to the outstanding debt. The notice stated that he needed to respond or else his property would be disconnected.

He responded a few days later to try and set up a payment plan. J.D Energy again responded saying he must book an appointment. However,

no appointments were available prior to the scheduled disconnection date.

On the scheduled date, he received an automated email saying that since he had not responded, the disconnection would go ahead as planned. His power was then disconnected, with an outstanding balance of \$2,000 accrued over 2 months.

Holden complained to UDL, stating that J.D Energy:

- Sent inaccurate bills.
- Failed to communicate adequately.
- Disconnected without following the correct process.

Holden's complaint was ultimately considered by the Commissioner.

The Commissioner started by considering the accuracy of Holden's bills.

Although the bills were higher than the average consumer, there was nothing to suggest that the bills were not accurate. However, the Commissioner did consider the size of the bills when assessing J.D Energy's communication.

The Commissioner considered the information provided to Holden when he signed up, including a claim on J.D Energy's website that it charged the same or less than other retailers. Holden said he chose to go with J.D Energy due to this promise.



However, a comparison of prices revealed that J.D Energy's plan was not the cheapest and that Holden could have reduced the total cost by over 40% by going elsewhere. J.D Energy was also unable to provide any evidence to support the accuracy of its price promise.

The Commissioner then looked at what happened after Holden signed up. This included applying industry standards that dictate what steps a provider should take when a customer experiences payment difficulties. These are set out in the Consumer Care Guidelines (CCG). They require providers to take proactive steps to support customers when payment issues arise.

Holden made numerous attempts to establish a payment plan with J.D Energy. Each time, J.D Energy made it clear they would only accept a full manual repayment of all outstanding debt in one lump sum.

After several attempts, J.D Energy agreed to make an exception and offered a payment plan that spread the outstanding debt over an extended period. Holden attempted to confirm this plan via email, however J.D Energy stated that he must make an appointment to accept.

The CCG requires providers to be accessible to consumers and to engage with them through their preferred channels. J.D Energy's insistence on booked appointments made it more difficult for Holden to sort out the issue.

The Commissioner determined J.D Energy had failed to communicate effectively with Holden throughout the process. J.D Energy appeared to have failed to follow the industry standards

and the CCGs. It has also put barriers in place that had limited Holden's ability to manage the growing debt.

The Commissioner also looked at the disconnection process set J.D Energy had followed and the CCGs. The CCGs require providers to make at least 5 contact attempts before disconnecting, including at least one traceable form of contact. The Commissioner said it appeared J.D Energy had also failed to meet the obligations imposed by the CCGs. The Commissioner noted J.D Energy's final disconnection notice had stated the process could be stopped if Holden contacted J.D Energy within a few days. Holden contacted them shortly after this, which should have stopped the disconnection process. However, J.D Energy went ahead with the disconnection regardless.

The Commissioner's decision confirmed J.D Energy had failed to meet the standards expected of a provider throughout the process. The Commissioner also identified several procedural changes that could improve J.D Energy's services going forward.

J.D Energy offered to reduce Holden's outstanding debt by 70% in response to the complaint and to provide him with 12 months to pay it off. The Commissioner ultimately decided this was a fair and reasonable offer to address the identified issues and closed the complaint. The Commissioner also directed that an anonymous version of his decision should be shared with the Electricity Authority and Commerce Commission for their information.

Too steep to deliver



Victor used two 45kg LPG bottles to supply gas to his home, and they were periodically replaced by his gas retailer Gas Solutions. Gas Solutions had delivered the bottles for several years, until a new delivery driver decided it was unsafe to deliver to the property.

Gas Solutions told Victor the steep driveway, steps, and uneven ground at his property made it unsafe to deliver the 45kg bottles to his home. Victor disagreed and proposed an alternative delivery location on the property. Gas Solutions refused to change its decision, saying the new option raised the same safety issues.

Victor and Gas Solutions also disagreed about who owned the 45kg bottles. Victor believed he had purchased them from Gas Solutions years earlier. Gas Solution said Victor had

simply paid a one-time rental payment and did not own the bottles. However, Gas Solution acknowledged its initial invoice was unclear and it offered Victor \$100 compensation for its poor communication.

Victor rejected this offer and brought his complaint to UDL, complaining:

- Gas Solutions should have continued to deliver gas bottles to his property
- He had purchased the gas cylinders and should receive a refund
- Gas Solution's communication was unclear and misleading

The Commissioner investigated Victor's complaints but ultimately decided Gas Solutions' decision to refuse to deliver the 45kg gas bottles was justified. Health and safety legislation requires gas suppliers to protect the health & safety of their workers. Industry guidelines set limits on slope, access steps, and path conditions for the safe delivery of LPG bottles. Victor's property didn't meet those standards.

While deliveries had taken place in the past, Gas Solutions was entitled to reassess the risk. After the driver raised concerns, Gas Solutions reviewed the decision internally and decided to stop delivery. Victor also confirmed that other suppliers had declined to deliver to the property, further supporting the conclusion that access was unsafe.



The Commissioner reviewed Gas Solutions initial invoice and decided it was unclear as to whether Victor was paying to rent or purchase the 45kg bottles. Gas Solutions agreed and confirmed it had updated its documentation to avoid future confusion. The \$100 compensation offered covered the savings Victor would have had if he had rented annually, rather than via one-off payment.

The Commissioner was satisfied Gas Solution's decision to stop delivering bottles to Victor's home was fair and consistent with its health and safety obligations. While Gas Solutions' communication could have been better, the compensation it had offered Victor was sufficient to address its failings. As a result, the Commissioner decided it was not appropriate to consider the complaint further.

Troubled waters



Water Connect was responsible for the local water and wastewater network in Ngatai's neighbourhood. For several years, Ngatai noticed wastewater seeping onto his property.

The water was pooling on his driveway, entrance steps, and nearby footpath. Ngatai believed the problem was caused by a broken pipe Water Connect was responsible for. The pipe serviced a neighbouring property and Ngatai had made multiple complaints to Water Connect without the issue being resolved.

Ngatai had also raised concerns about a pipe from his neighbour's property. The pipe was connected to the public wastewater system. Ngatai suspected stormwater from his neighbour's property was being illegally diverted into the wastewater network, increasing the flooding on his property during wet weather.

Ngatai made a complaint to UDL, complaining:

- Water Connect had failed to follow through on commitments to repair the leak
- The connection on his neighbour's property between the private and public wastewater networks had not been properly fixed
- Water Connect had not taken sufficient responsibility for the ongoing wastewater seepage

The Commissioner started by considering the steps Water Connect had taken to try and repair the leak on its network. The Commissioner reviewed all Water Connect's work on the leak, which included more than ten inspections and tests on the public wastewater pipes in the area. Only one of the inspections had identified an issue and the Commissioner was satisfied Water Connect had taken appropriate action to address it.

The Commissioner also considered Ngatai's complaint about the connection on his neighbour's property between the private and public network. Water Connect set out its network maintenance responsibilities clearly on its website, which excluded private wastewater pipes such as the one on Ngatai's neighbour's property. Water Connect did, however, contact the owners of the neighbouring property to encourage them to inspect their own network, however, it was ultimately up to the local council to take further action.



The Commissioner also considered information from a private plumber who was subsequently contracted to investigate the leak by Ngatai. The plumber provided footage from before and after the work, that showed no evidence of repair.

The Commissioner was ultimately satisfied Water Connect had met its obligations in most respects. It had investigated the matter thoroughly, completed appropriate tests, and addressed issues within its control. It had also communicated with the council and the neighbouring property owners regarding private pipework concerns.

However, the Commissioner was concerned the information provided by the private plumber raised doubt about whether Water Connect's repair of the leak had been successful. He recommended Water Connect revisit the site to inspect the repair and confirm if any further work was needed. He also recommended that Water Connect provide Ngatai with a summary report of its findings. Water Connect agreed to do so and the Commissioner closed the complaint.



A cable too shallow?



When Ravi began landscaping the shared driveway outside his home, he hit something unexpected: a buried fibre cable.

It has been installed before Ravi moved into the area, without any objections from the previous homeowners.

The damage disrupted Ravi's broadband service, and shortly after, Ravi received invoices from his fibre provider, Good Fibrations, charging him for the repair. Two invoices were over the course of a month, totalling over \$1,000.

Ravi didn't believe the bills were fair. He thought the cable had been installed too close to the surface, without proper protection or clear markings. He also questioned whether it had even been installed in the right location to begin with.

Ravi complained to UDL, raising the following concerns:

- The cable was not buried at the minimum required depth
- It lacked proper protection and surface indicators

- One of the invoices he received appeared to be a duplicate

When considering depth, the Commissioner considered the Telecommunications (Property Access) Regulations 2017, which state the cable must be at least 20cm below ground level. Ravi provided photos he had taken while digging, suggesting the cable was buried at a depth of around 10cm. Good Fibrations challenged the photos and noted their records said it was buried at 20cm.

The Commissioner reviewed the evidence and agreed that the exact depth of the cable couldn't be clearly determined. The photos did not provide conclusive proof that Good Fibrations had failed to meet the required depth, and there was no evidence that the installation had breached the legal standards at the time it was done.

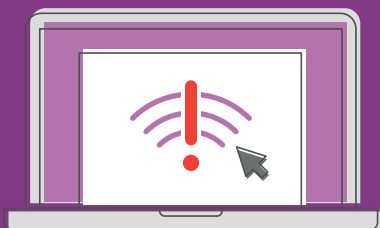
The Commissioner also considered whether Good Fibrations should have protected or marked the location. The regulations did not create a legal obligation on Good Fibrations to notify new homeowners, or mark the location of the cable. Homeowners were expected to contact the service '*Before you Dig*' prior to starting work on a property.

Finally, while Ravi questioned whether one invoice was a duplicate, this fell outside of the Jurisdiction of the BSPAD Scheme and therefore couldn't be considered.

The Commissioner decided that Good Fibrations had complied with its obligations and that there was no basis to cancel the invoice.



Lagging behind?



Violet signed up for broadband services with Telconnect, on a high-speed unlimited broadband plan. Not long after, she began experiencing problems with her internet connection.

She believed it was running slowly and claimed to experience frequent lagging. She also thought that her broadband usage was higher than it should have been, even for a full household.

Violet contacted Telconnect to report the issues. It said her usage was consistent with what is expected in larger households, and its data indicated no issues with the connection.

Unsatisfied with this outcome, Violet brought her complaint to UDL, raising the following issues:

- Her broadband usage was unusually high
- The internet connection frequently lagged and was unreliable
- A third party was accessing her connection without permission

This case reached the early resolution team at UDL. They worked with both parties to try and find a solution, while also considering if the complaint should be accepted for further consideration.

They reviewed the steps taken by Telconnect and found it had responded appropriately to Violet's concerns by checking the service, arranging a technician, and explaining the likely reasons for high usage. After considering the evidence provided by both parties, there was no evidence of any issues with the broadband service.

The Commissioner therefore issued a decision confirming the complaint should not be accepted for further consideration.

However, the Commissioner also noted that Telconnect could have provided more practical advice when managing the complaint.

Performance standards

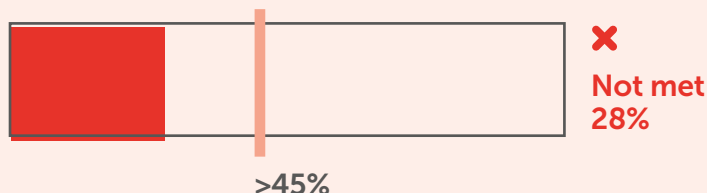
Time to close cases

The performance standards for time to close cases were not met this year.

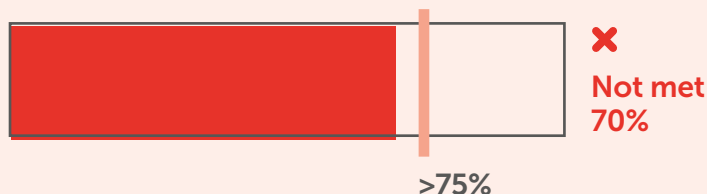
The additional focus on closing complaints at the deadlock stage has impacted our average close, as more straightforward cases are being resolved by the Early Resolution team. Our board has approved new performance standards for 2025–26 to reflect this change.

Performance Standard A

>45% DL cases closed in 30 working days



>75% DL cases closed in 90 working days



We run surveys for both complainants and providers to ensure we are meeting the needs of both parties. Independence is a significant element of the work we do, so it is important that both consumer and provider are satisfied with our service.

Complainant satisfaction

Performance Standard B

Goal: Reaching an average of 4 out of 5



Provider survey satisfaction

Performance Standard C

Goal: Reaching an average of 4 out of 5



Unprompted awareness

More and more people are reaching out to us for support as highlighted by the increase in contacts to UDL this past year.

Our current objective is to have a 20% unprompted awareness in a general awareness survey. As available surveys do not measure unprompted awareness, we track progress through the biennial Ministry of Business, Innovation, and Employment (MBIE) consumer awareness survey, which measures prompted awareness.

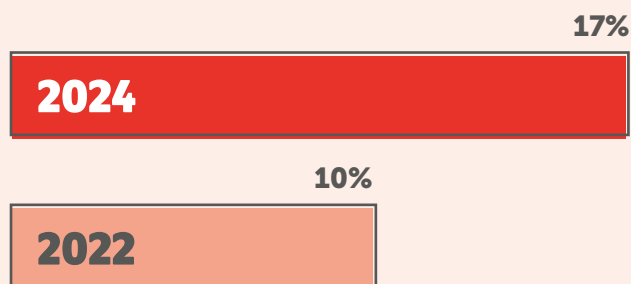
In the 2024 survey, UDL's prompted awareness increased by 7% to 17%. This was the largest increase in awareness amongst organisations of our kind. UDL is the only dispute resolution scheme that has consistently increased its awareness in each survey since 2018.

UDL commissioned research from Martin Jenkins into the 'Squeezed Middle' also provided insight into our awareness. The report found that "15% of consumer knew about UDL before they responded to the survey".

We have agreed to change our awareness performance standard for the next reporting year. Our target will be 25% prompted awareness, which will require an 8% increase before the 2026 MBIE survey. We believe this is more aligned with the work we are doing to raise awareness.

Performance Standard D

20% unprompted recognition in general awareness survey.



Prompted general awareness



15% of consumers knew about UDL before they responded to the survey.

– The "Squeezed Middle", Martin Jenkins, pg. 2.

Compliance reporting

The UDL Board monitors UDL's performance and compliance with its obligations through a comprehensive annual self-review. The annual review covers each reporting year, and it incorporates feedback from our Advisory Committees. The review also provides detailed breakdown of how UDL has performed in relation to its Performance Standards.

Performance Standard E

Compliance reporting for the Energy Scheme is complete, accurate and on time

✓ **Met**

External review of cases

An external review of cases was not completed last year. The year prior, the review was conducted as part of an independent review of the Energy Complaints Scheme. The feedback was largely positive, and the few recommendations raised have been integrated over the past year.

Performance Standard F

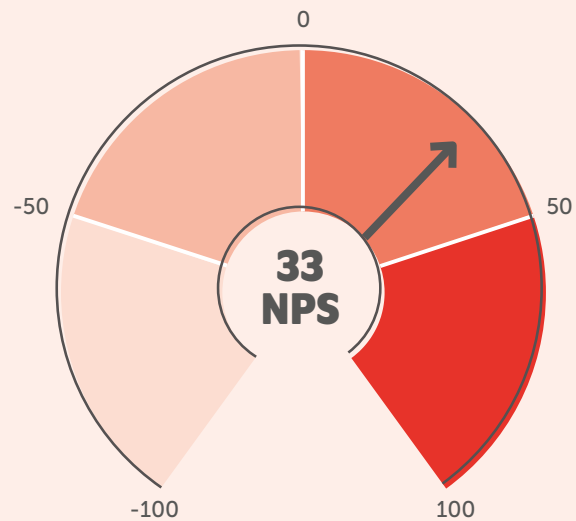
Assess complaint handling as meeting requirements of natural justice and good complaint handling

✗ **Not met**

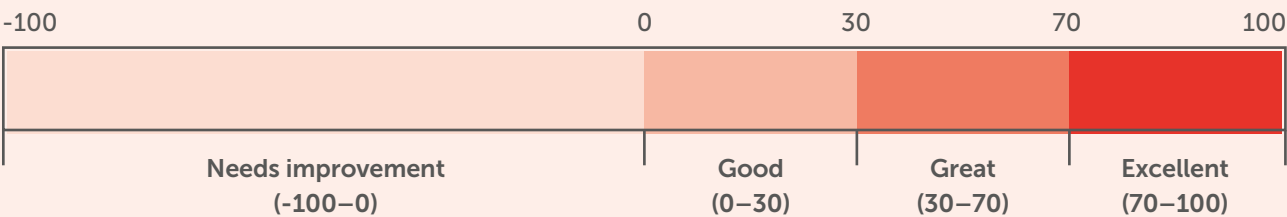
Other feedback scores

We also use surveys to measure the Net Promoter Score of UDL.

A Net Promoter Score (NPS) measures customer loyalty by looking at their likelihood of recommending a given service/company/business to a friend or colleague. An NPS score is measured with a single-question survey and reported with a number ranging from -100 to +100, where a higher score is desirable. Our Net Promoter Score (NPS) is categorised as GREAT with a score of 33.



What is a good NPS score?



Timeliness to close

We are changing the way we measure the time taken to close complaints, to better reflect organisational shifts that have more closely aligned the Early Resolution and Investigation and Conciliation teams.

The new standards will track the timeliness of all key aspects of our service from queries to deadlocked complaints, which includes accepted complaints. This is a shift from focusing solely on accepted complaints. The new standards have been set out on the right and will apply from next year. We have shown how we have performed this year to illustrate how they will be applied.

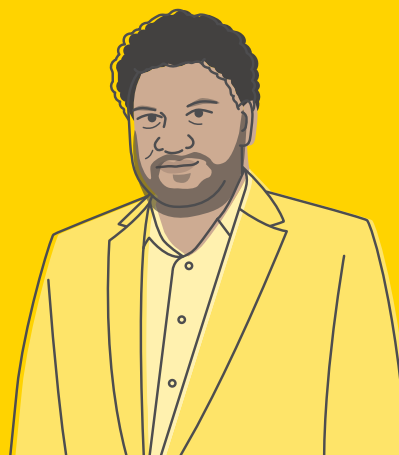
PERFORMANCE STANDARDS

2025–26	2024–25
90%	90%
of queries closed within 1 working day	
90%	91%
of all complaints and queries closed within 10 working days	
65%	66%
of all deadlocked complaints (includes accepted complaints) closed within 30 days of deadlock	
90%	90%
of all deadlocked complaints (includes accepted complaints) closed within 90 days of deadlock	

Te Ao Māori and Te Tiriti o Waitangi strategy

Our Te Ao Māori journey continues with the advice and support of our Māori Cultural Advisor, Selwyn Lackner-Priest. The past year has seen a focus on improving our knowledge and use of Te Reo Māori and Tikanga including:

- internal training to support e.g.:
 - weekly Te Reo lessons
 - training
 - activities designed to improve our understanding of Te Ao Māori centred around events such as Matariki and Te Wiki O Te Aotearoa
 - offering of tikanga accredited mediation
- targeted engagement and functional relationship building with Māori organisations including Māori Women's Welfare League, Ngāti Mutunga and more
- ongoing Te Reo translation of our web pages
- a tailored consumer booklet in Te Reo *Ānei mātouhei awahi* | *We're here to help*
- producing a video and visual content specifically designed for Ngāti Mutunga as part of our tailored strategy to further strengthen our relationships.



Selwyn Lackner-Priest

Pou Tikanga

UDL Māori Cultural Advisor

Te Ao Māori strategy

Our strategy continues to evolve to guide our mahi in this area. It has been designed to focus on what we need to build internally, and to inform our external engagement and outreach. Over time this approach will influence our mahi, to ensure the core message is embedded: "What is good for Māori is good for Aotearoa (& UDL)".

Details of the strategy are set out below, showing how we will apply a four Māori 'strands' approach to guide ("weave") our Te Ao Māori journey.

STRAND 1

Te Reo Māori

Incorporating Te Reo Māori into our internal training and development, as well as our external engagement will be an area of focus. Understanding the language enables an understanding of more than just words: "Ko taku reo taku ohoohe | my language is my awakening".

STRAND 2

Tikanga

Incorporating practices and values that are Māori. We will focus on continued work to improve our knowledge and understanding of the appropriate tikanga for the work we do. This can be provided formally and informally for the users of our services.

STRAND 3

Te Tiriti o Waitangi | Treaty of Waitangi

Our Commitment to the Treaty of Waitangi | Ūtanga mō Te Tiriti o Waitangi.

UDL is committed to developing an understanding of Te Tiriti and reflecting it in the mahi we undertake and our engagement with tangata whenua/iwi. This is to ensure UDL can embed this in its complaint processes and engagement with tangata whenua and iwi.

Through commitment to the Treaty and its principles, we are working to:

- build genuine and durable partnerships with Māori; and
- ensure active participation of Māori in decision-making, planning and service delivery at all levels of our organisation; and
- protect the interest of Māori through the delivery of culturally responsive services that meet the needs of Māori.

STRAND 4

Ngā mahi ā hapori | community activities and involvement

UDL is committed to creating meaningful relationships and fostering connections throughout Māori communities.

This includes mana enhancing interactions with everyone through meaningful conversations and engagements and having a positive presence at kaupapa Māori. This includes whakawhitiwhiti kōrero | sharing and exchanging dialogue communication. Pāpāho pāpori | social media platforms. Within and external to UDL we are building Māori connections alongside our Te Ao Māori strategy intertwining our *mahi* and *whakawhanaungatanga* | *establishing relationships* through the building of relationships and fostering connection.

Community engagement work

Our community engagement work is aligned with our Te Ao Māori journey respecting tangata whenua across Aotearoa.

Our Community Engagement Officer is regularly invited to different marae across Tāmaki Makaurau | Auckland to support their events and connect with the local communities. Our newly translated booklet *Ānei mātouhei awhi* | *We're here to help* is well received with over 10,000 copies requested and received in the first six months of print. It is also available online. UDL attended Waitangi Day celebrations at Te Tiriti O Waitangi Marae, engaging with communities and individuals and one person coming directly to see our Community Engagement Officer after her mother saw our FaceBook posts and told her daughter to come and see us. We were privileged to be at these special celebrations sharing a stand with Auckland Community Law and the Electoral Commission who invited us.

The UDL Board and senior UDL staff attended a Māori cultural day at Te Tatau o te Pō Marae in Petone, to further develop relationships with local iwi and extending that outwards.

Community

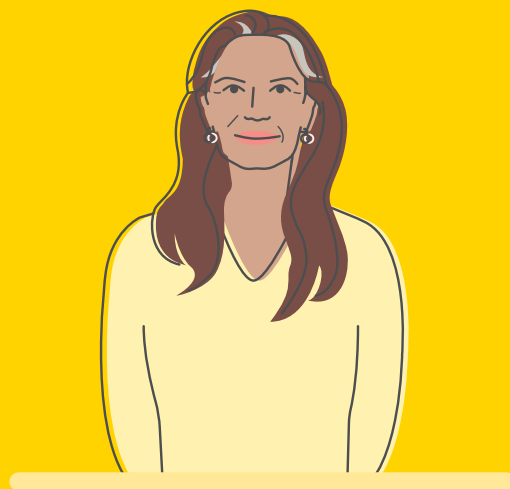
Community outreach

Connecting with communities across Aotearoa remains a key focus area for UDL.

Our work in this area is guided by our Communications, Māori and Community Engagement Strategy. Aligning with that strategy is the Phases of Community Engagement Model that we developed inhouse which enables clear, meaningful measurement of our engagement within the community. An extract of our model is shown below.



In addition to attending regular community events and hui, our Community Engagement Officer manages a number of activities to further reach into communities and build trust. Our key mantra is that “you can only go at the speed of trust in the community”. Activities range from clinics in focused areas of need, including the Pride Project Community House in Manurewa and I Am Māngere in Māngere Town Centre in Auckland, as well as virtual presentations across the country.



Jessica Niemack

Tautohetohe Whaipainga Kaitūtakinga
UDL Community Engagement Officer

These virtual presentations are particularly helpful for organisations like Citizen Advice Bureau across Aotearoa.

We work with community support groups, educate the educators, and work directly with consumers.

Outside of Auckland, we have travelled across the country for events, heading south for the Canterbury University open day, and to the far north to meet with many community groups.

UDL also held roadshows and events in a number of locations during the year. This includes multiple events in Auckland, Matamata, Hamilton, New Plymouth, Waitara, Gisborne, Taupō, Rotorua and Tūrangi. Our Community Engagement Officer is often accompanied by staff from our Early Resolution or Conciliation Teams and/or our Māori Cultural Advisor.

The Deputy Commissioner and Commissioner enjoy participating in community engagement meeting with community organisations over the year at events or speaking engagements: including Disability Connect, South Auckland, Youth Network, Porirua Pasifika Network and also take up media interviews.

Digital engagement

Digital engagement provides a valuable way to connect with consumers and providers. Our social media and website are often more consumer focused, while webinars and newsletters tend to focus on consumers and providers. In all cases, there is overlapping content that provides value to both parties.

Social media

UDL continued its focus on developing its social media presence over the year, which resulted in significant growth. We mainly operate on Facebook and LinkedIn, and average around 11 posts a month. Facebook is our primary source, and accounts for over 90% of each combined value shared below. We use social media as a method of reaching new consumers and growing awareness, while sharing details of our services and industry knowledge.

Our organic reach for the year increased by over 850%. Reach is the number of unique profiles that see each post. Our reach is organic, meaning we do not spend any money in social media spaces. Our yearly reach increased to a total of 390,764 unique views on posts.

Our most successful post, was a case example of a consumer's bill being reduced by \$8,000, reached 19,884 unique accounts.

390,764

unique views on social media posts made

Webinars

We held six webinars over the year, on various topics related to UDL, the work we do and utilities we work with. Webinars are a key element of our 'educate' approach, giving us a platform to discuss relevant issues within our own processes and the wider industry.

Topics included:

- Jurisdiction Challenges
- UDL Data
- Solar considerations
- UDL Case Studies
- Supporting Medically Dependent Consumers
- Early resolution

The webinars averaged 95 registrants and 51 attendees across the reporting period. Many of these registrants who did not attend would then watch the recording later. We had a total of 249 views of webinars recorded in 2024–25: an average of 41.5 views per webinar. Webinars from previous years continued to perform well also, with 217 views over this year.

Feedback forms were sent out after each webinar, with our key questions asking viewers how useful they found the webinar. We averaged a 4.17/5 in usefulness, an improvement over the 2023–24 score of 3.9/5.

4.17



Average usefulness of UDL webinars

Newsletters

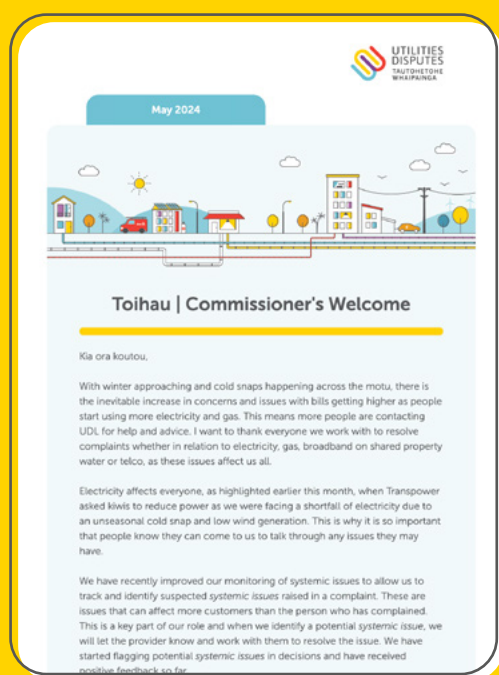
Newsletters are our primary channel for mass communication with providers, although many consumers and consumer groups are also subscribers. They provide a platform to share organisational updates, promote other content such as new collateral or upcoming events, and otherwise pass information to our members.

We published nine newsletters in 2024-2025, to an audience of over 1,200. We averaged 574 unique opens per newsletter, for a 48.2% open rate.

Over the past reporting period we have introduced several new consistent sections that will appeal to our audience. This includes a staff profile, data driven article, and case study in every newsletter.

574

unique opens per newsletter



Website

We continually review and update our website to enhance user experience. This past year we have begun the process of having both Te Reo Māori and English on the website.

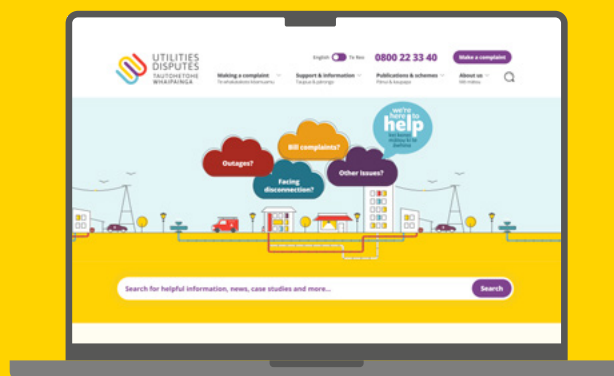
Filtered to NZ traffic, our site had 80,872 views over the reporting period, by 25,513 active users. Our engagement rate was 54.13%, meaning that more than half of all sessions included engagement from the user. Across industries, this would be considered an acceptable engagement rate.

To support consumer understanding we have made added additional guidance. This includes the '[Know your rights](#)' page which provides a simple and straightforward summation of what consumers can expect from their providers, and a page highlighting [our systemic insight report](#). Webinars and newsletters are hosted on the website after publication, and case studies are posted regularly.

Our Google Business profile was viewed 4,442 times and prompted 485 calls.

80,872

website views



Providers

We continue to take steps to strengthen our relationships with our providers. We use a number of methods, tailored reports, regular meetings, newsletters and webinars, and in-person engagements like the annual forum and our specialised complaint training.

Building these relationships supports us in our objectives to prevent, educate, and resolve; helping providers fix the issues that lead to complaints and working together to resolve them faster when they occur.

364 members in 2024–2025
(369 in 2023–2024)



357

Energy

(362 in 2023–2024)

- Including at least 139 (179) secondary networks.
- 21 new members joined the scheme.
- 26 members exited the scheme. This can partially be attributed to difficulties in the electricity market for smaller retailers.



3

Broadband Shared Property Access Disputes

(3 in 2023–2024)



1

Telco

(1 in 2023–2024)



3

Water

(3 in 2023–2024)

Annual forum

We hosted the 2024 forum in April. The event was well attended by providers, as well as some consumer and community groups. It's an opportunity to provide training and development on complaint resolution and connect with our providers. The theme of this year's forum was *Resolving with Resilience*. Attendees participated in an interactive workshop focused on resilience, with other sessions explaining what makes and offer fair and reasonable, sharing data and insights, and learnings from complex complaints.

In recent years we have included a panel session and this year the panel debated the merits and feasibility of a model energy bill with panellists representing The Lines Company, Flick Electric, Nova Energy, Powerswitch, Consumer Advocacy Council and ERANZ. Feedback was positive, with attendees rating its overall usefulness as 4.6/5.

4.6



Average usefulness of UDL forums



Training

UDL offers tailored dispute resolution training for members' staff. This training covers how to manage complaints and deal with challenging behaviours. Level 1 training is offered to member companies for free, while level 2 onwards have a fee.

UDL hosted four level 1 training over 2024–25, and one level 2.

Surveys were sent out to participants to get feedback on the training, which returned an average usefulness rating of 4.2/5.

4.2



Average usefulness of UDL training



UDL 101s

A UDL 101 provides an overview of UDL's services and the work we do to key stakeholders. This year's sessions were provided to the Electricity Authority and Commerce Commission. UDL 101s are aimed at improving awareness and knowledge of our work we do as well as strengthening our connection with key stakeholders. An example of the importance of this work is shown in the 2024 Consumer NZ survey. It suggested approximately 25% of consumers would approach the Electricity Authority if they had an issue with their energy provider. If Electricity Authority staff know what we do, and they will be more likely to refer appropriate complaints to UDL.



Reporting

Systemic issues

Systemic issues are issues that have the potential to impact a number of customers, often because this issue is likely to be repeated or widespread.

An important role of a dispute resolution organisation is to identify systemic issues and to take steps to try and remedy the problem. This can be by recommending a solution or by referring the issue to a regulator, or other relevant authority.

We increased our systemic identification and reporting in the year. We published a systemic insights report. We also shared systemic data and multiple Commissioner decisions which highlighted systemic issues for regulators and industry bodies. We received positive feedback from parties in response to this increase in activity.

Systemic Insights Report

Our inaugural Systemic Insights Report was published in December 2024, highlighting some of the systemic issues we identified with insights supported by data. The report included examples of systemic issues and the actions we took to remedy the issues before they could impact more customers.



Systemic decisions

Our role gives us unique insight into wider industry issues that affect consumers and providers. It is vital we share these insights, so they can play a role in improving outcomes for everyone who relies on utilities.

We referred 26 Commissioner decisions to regulators and other relevant industry bodies last year. Decisions are anonymised, however, recipients are invited to request further details if they believe further investigation may be justified.

Our submissions

We produce expert submissions on any discussion paper, bills, or regulatory changes that touch upon our areas of expertise and knowledge.

We produced nineteen submissions in the last year on a wide number of topics, typically involving utilities or dispute resolution. These submissions are available on our website.

Some of the topics we submitted on include:

- Electricity regulations
- Telecommunications regulation
- The Consumer Care Obligations
- Consumer data rights
- Water services

We also appeared before a Select Committee on two occasions:

- the Consumer and Product Data Bill on 19 September 2024.
- the Finance and Expenditure Committee at the select committee hearing into the Local Government (Water Services) Bill on 6 March 2025.

Our research

We published two separate pieces of consumer research this year, commissioned from:

1. New Zealand Institute of Economic Research (NZIER)
2. Martin Jenkins.

1. NZIER Costs Benefit Analysis

NZIER's research focused on the economic benefits UDL's complaints resolution provides to consumers and providers. This included:

- up to \$4.2M in savings a year when compared to alternative dispute resolution;
- up to \$2.9M in savings by avoiding additional negotiation;
- reducing the amount providers write off due to errors and systemic issues; and
- improving the efficiency and effectiveness of utility company complaint handling.

NZIER concluded UDL also provided sector wide benefits by applying industry standards, identifying systemic issues with providers and regulators, and sharing outcomes.

2. Martin Jenkins research into the "Squeezed Middle"

Martin Jenkins considered consumers in the "Squeezed Middle" in Aotearoa, their awareness of UDL and what UDL could do for them. Martin Jenkins found the squeezed middle included 1.4 million people – those who indicated they only had just enough money to meet their everyday needs. The squeezed middle were found to be:

- more likely to experience problems with their electricity company than other utilities;
- typically had household incomes between \$60,000 to \$80,000;
- 50% are in full time employment; and
- usually live with a partner or with a partner and children.

Martin Jenkins stated 31% of the squeezed middle had a problem with one of their providers in the last year and recommended targeted campaigns to raise awareness of UDL and encourage them to access our services to help resolve those issues.

Our stakeholder reporting

Our reporting uses PowerBI to create insightful new reports with increased automation. Each month we distribute different reports which have been specifically tailored for our different schemes and stakeholders. In a typical month we distribute nine different reports to 149 recipients at 74 different organisations.

Monthly provider report

We produce regular monthly reports for providers who are members of our schemes. The reports include details of a open complaints and details of their status. The reports also contains comparative data on every complaints and enquiry we receive to show how the provider compares to their sector and similarly sized providers.

The reports give providers information that supports them to identify and resolve complaints internally. The reports also contain information that allows them to better monitor any ongoing complaints that are with UDL.

Stakeholder reports

We created reports for other stakeholders that contain high-level statistics and insights for each scheme. We sent these to multiple organisations including regulatory and industry groups to support them in their own planning and reporting.

Our people

We're lucky to have an immensely talented team here at UDL. We take pride in making sure they are supported to perform and have opportunities to develop, so we can provide the best possible service across Aotearoa.



Employer recognition

UDL was shortlisted for two employer awards this year; one recognising our office culture, and one recognising the work we do.

The Best Place to Work awards shortlisted UDL in the small workplace category as a reflection of the mahi we do to make UDL a positive and productive environment. Staff were surveyed as a part of the application process, which returned an office net promoter score of 83 – comfortably in the 'Excellent' range.

Staff comments on why they scored the organisation favourably included:

- *"Good office culture, flexible working conditions, and focused on solutions rather than blame."*
- *"I love working for UDL, I have never felt more seen and cared about as a human being rather than just an employee. There is such a great culture at UDL everyone gets along and everyone is focused on the same goal of providing a top-quality service."*



Best place I've ever worked hands down. Always so accommodating and flexible. Great team.

We were also shortlisted in the 'Supporting Gold' category at the Wellington Gold Awards. This was recognition of the work we do to support consumers and providers.

Staff engagement

We measure staff engagement through annual Gallup Engagement Surveys. We have done this since 2018. This survey asked employees questions around how supported they feel, if they feel like they can develop, and if they feel heard in the office. Using these answers, a 'mean' engagement score for the organisation is produced. A higher engagement mean has consistently been linked to better business outcomes.

Our engagement mean was 4.56/5, which puts us in the 84th percentile in Aotearoa. This was the sixth consecutive year that we improved this score.

When asked "What do you feel is the major strength of this organisation", staff responses included:



The people are really committed to doing a good job and supporting each other, including the leadership and Board.



The culture and team support. Leadership and staff's knowledge and commitment to helping consumers.



It's the people and knowledge we have built up. The collaborative way we approach things means there is a lot of involvement and people have the chance to have their say.

Staff training

We regularly offer training to allow staff to develop and upskill where possible. All operational staff undertake the Resolution Institute's five-day mediation course, to ensure they are properly equipped with the necessary tools to manage complaints. Three UDL staff achieved accreditation this year.

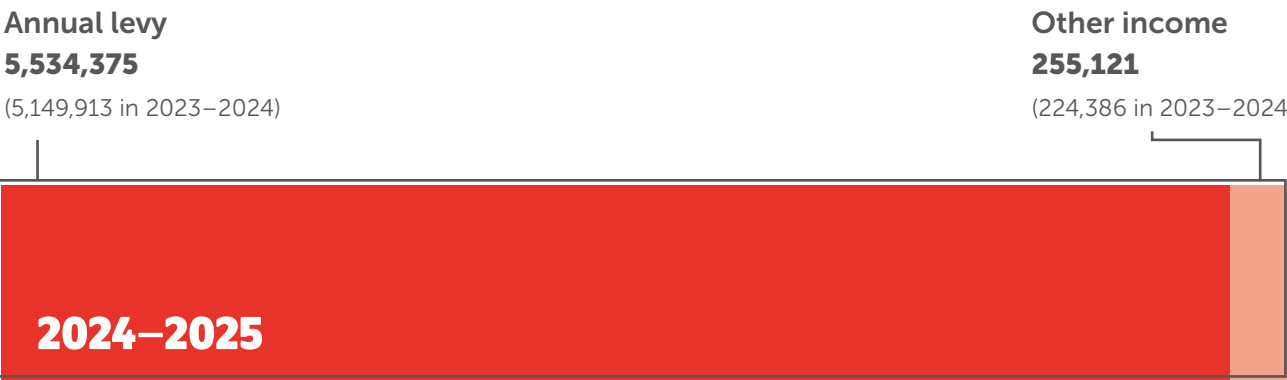
Other training completed last year includes:

- Lifeline mental wellbeing training
- Legal writing training
- Health and safety committee training

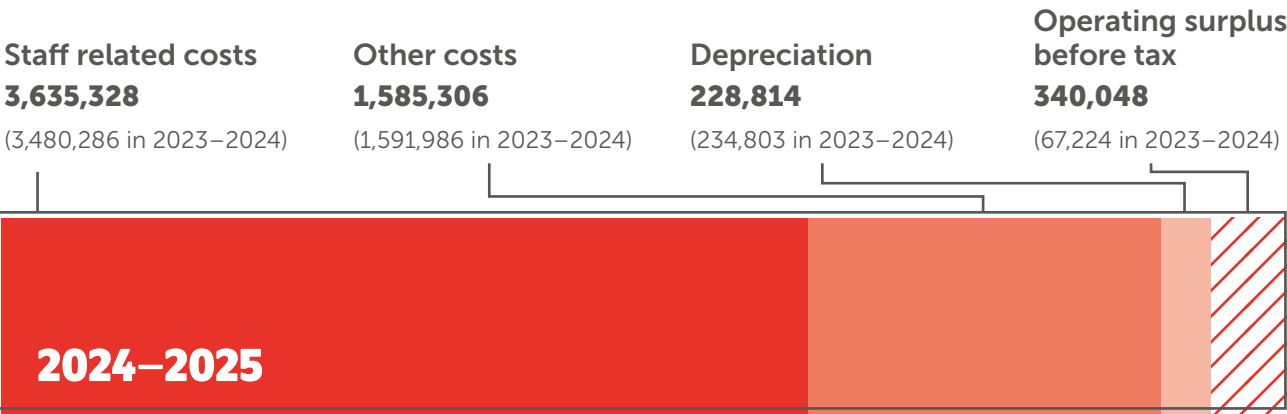
For the year ended 31 March 2025

Financial summary

All schemes



Total income
5,789,496
(5,374,299 in 2023–2024)



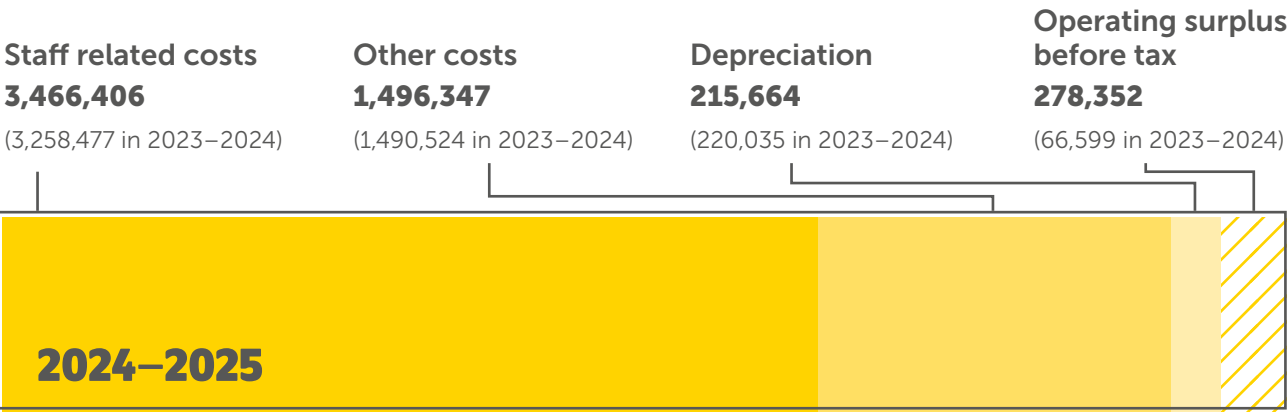
Total expenditure
5,449,448
(5,307,075 in 2023–2024)

Budget
5,620,301
(5,041,336 in 2023–2024)

Energy



Total income
5,456,769
(5,035,635 in 2023–2024)



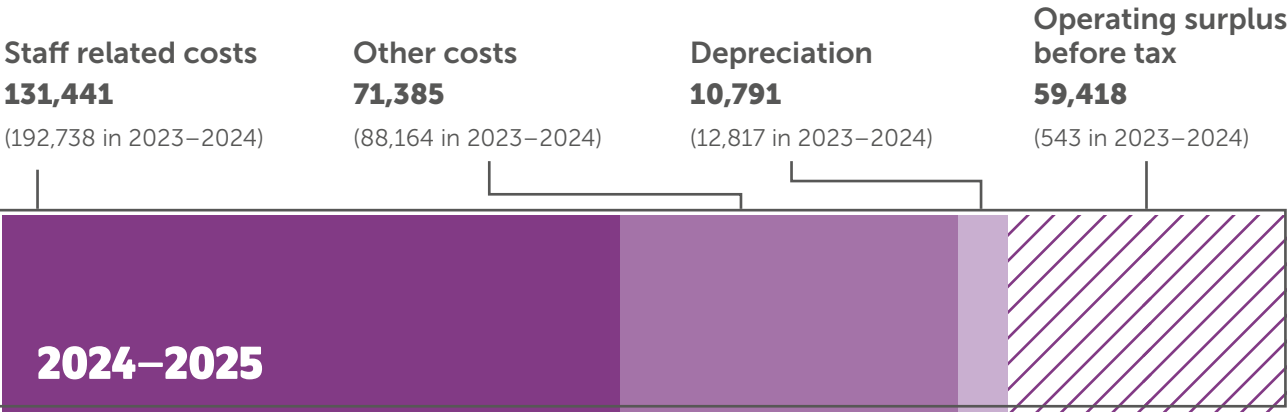
Total expenditure
5,178,417
(4,969,036 in 2023–2024)

Budget
5,351,733
(4,719,600 in 2023–2024)

Broadband Shared Property Access Disputes



Total income
273,035
(294,262 in 2023–2024)



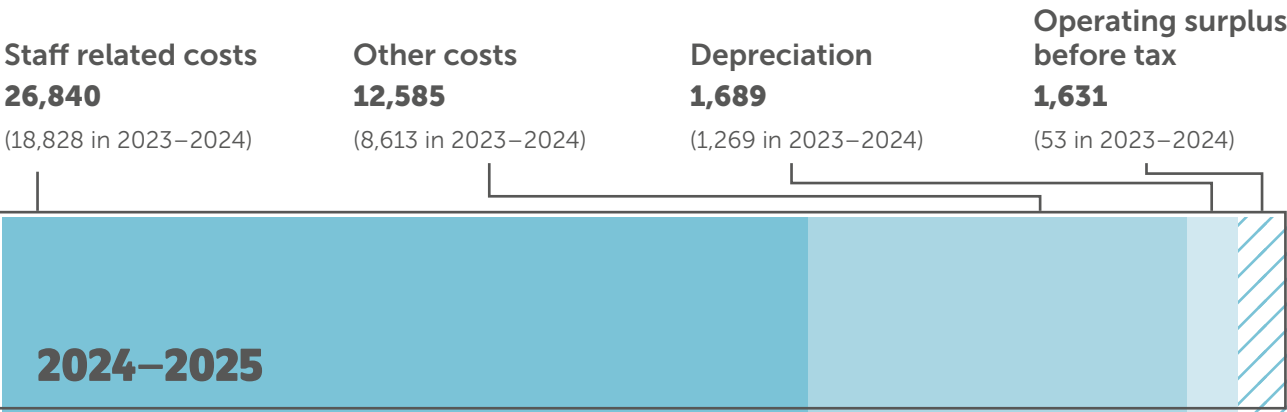
Total expenditure
213,617
(293,719 in 2023–2024)

Budget
214,565
(287,527 in 2023–2024)

Water



Total income
42,745
(28,763 in 2023–2024)



Total expenditure
41,114
(28,710 in 2023–2024)

Budget
38,653
(34,209 in 2023–2024)



UTILITIES
DISPUTES
TAUTOHETOHE
WHAIPAINGA