Raising awareness of dispute resolution scheme

Post-implementation review

22/07/2026

Executive summary

From 1 April 2021, in response to a recommendation in the Electricity Price Review, the Electricity Authority Te Mana Hiko (Authority) has required electricity retailers and distributors to provide clear and prominent information on their websites and in their communications with consumers about the dispute resolution scheme, Utilities Disputes. Retailers were also required to provide consumers with clear information about comparison and switching services.

The Authority has carried out a post-implementation review of these requirements to assess whether they have delivered their intended benefits and impacts.

This paper focuses mainly on how aware consumers are of the services available to help resolve disputes. It also looks at awareness of comparison and switching services, particularly to inform the recently launched Billy website.

Audits show that most participants are complying well with clauses 11.30A and 11.30B of the Electricity Industry Participation Code (Code). This means information about Utilities Disputes and comparison and switching services is generally available to consumers.

Consumer surveys suggest that awareness of dispute resolution schemes like Utilities Disputes is still low. However, Utilities Disputes has reported a significant increase in calls since the requirements were implemented. This suggests awareness is improving.

Requiring information about Utilities Disputes to be included on all power bills – as opposed to simply accompanying all communications about billing – is expected to further increase awareness. Promoting this service on the new comparison and switching site should also help. The Authority should keep looking for ways to make this information easier to find and accessible to different users of the Billy site.

Around 60% of consumers say they are aware of comparison and switching services such as Powerswitch. However, awareness is lower among lower-income households. To support consumer affordability, efforts should focus on increasing awareness of the new Billy website among lower-income and vulnerable households.

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1. Purpose

1.1 The purpose of a post-implementation review is to evaluate an initiative against its expected outcomes. From the Authority's perspective, this enables learning about how regulatory decisions, or decisions not to regulate, are affecting the sector and whether further policy action is required.

1.2 In April 2021, the Authority released guidelines supporting the implementation of clauses 11.30A to 11.30E in the Code. These Code amendments aimed to increase consumer awareness of two key services, namely Utilities Disputes (a dispute resolution service for complaints about electricity) and Powerswitch (the electricity plan comparison site formerly funded by the Authority but now replaced by Billy[1]).

1.3 This paper focuses on how these Code amendments have affected consumer awareness of Utilities Disputes, and whether the results align with the proposed benefits outlined in the cost benefit analysis.

1.4 In this report, references to comparison and switching services relate to Powerswitch. The Authority's new comparison and switching site, Billy, launched at the end of March.

1.5 Insights about awareness of Powerswitch will be used to inform any future work to increase consumer awareness of Billy.

2. Objectives of the Code amendments

2.1 One of the Authority's core strategic outcomes is to make electricity more affordable for consumers. Achieving this is reliant on ensuring consumers are aware of their options and services available to them.

2.2 The key objectives of the Code amendments were to:

(a) ensure retailers and distributors provide clear and visible information about these services in order to **increase consumer awareness**

(b) empower consumers to have choice, leading to **a more competitive and efficient electricity industry**

3. Findings

3.1 Each year, the Authority conducts consumer perception surveys. Last year's survey[2] used a different format to previous years. However, all surveys[3] include questions about whether consumers know how to make a complaint if they have any issues with their electricity retailer or service provider.

Awareness of dispute resolution services increasing but remains low

3.2 To assess awareness of the Utilities Disputes service we looked to answer two key questions:

(i) To what extent has consumer awareness of Utilities Disputes, as measured by the consumer sentiment survey, increased since the Code amendments?

(ii) Has there been a measurable change in the number of complaints handled by Utilities Disputes?

[1] Billy: There's power in checking

[2] 2025 Consumer Perceptions and Sentiment Survey Report

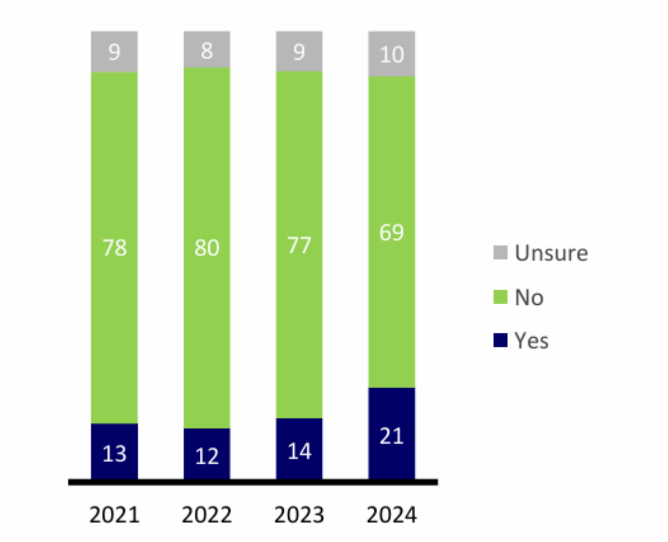
[3] Across all surveys, response volumes were consistently close to 1,000 residential consumers

3.3 The consumer sentiment surveys show some increase in consumer awareness in recent years. The number of complaints handled by Utilities Disputes has also risen since the Code change. Together, this suggests the Code change has had a positive effect, although consumer awareness still remains low.[4]

3.4 Figure 1 shows that in 2024, 21% of residential consumer responses indicated that they had heard of the Utilities Disputes service. This is an increase of 7-9% compared to previous years. However, most residential consumers were still unaware of the service.

Figure 1: Awareness of Utilities Disputes service, 2024 survey results

Q: Before now, had you ever heard of the Utilities Disputes service? (%)



Base: All respondents (approx. n=1000 per survey).

3.5 Figure 2 shows results from the 2025 survey for both residential and small business consumers. It asked whether consumers knew “where to get help if my power company treats me unfairly”.

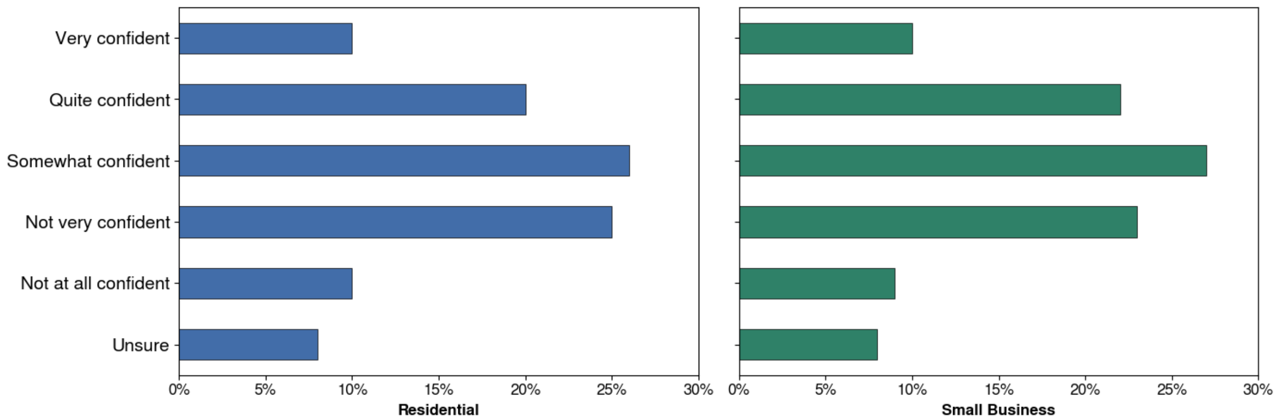
3.6 Around 30% of residential consumers and 32% of small businesses said they were either quite confident or very confident in knowing where to get help. A further 26% of residential consumers and 17% of small businesses said they were somewhat confident.

3.7 While not directly comparable with earlier surveys, the increase in awareness of Utilities Disputes shown in the 2024 survey, together with the relatively high confidence levels in 2025, suggests awareness of dispute resolution services is improving. That said, the higher confidence in 2025 may reflect consumers feeling comfortable contacting their retailer directly, as the survey did not specifically ask about Utilities Disputes.

3.8 We also note that awareness of complaints services may depend on whether consumers have needed to use them. This was not asked in any of the surveys conducted.

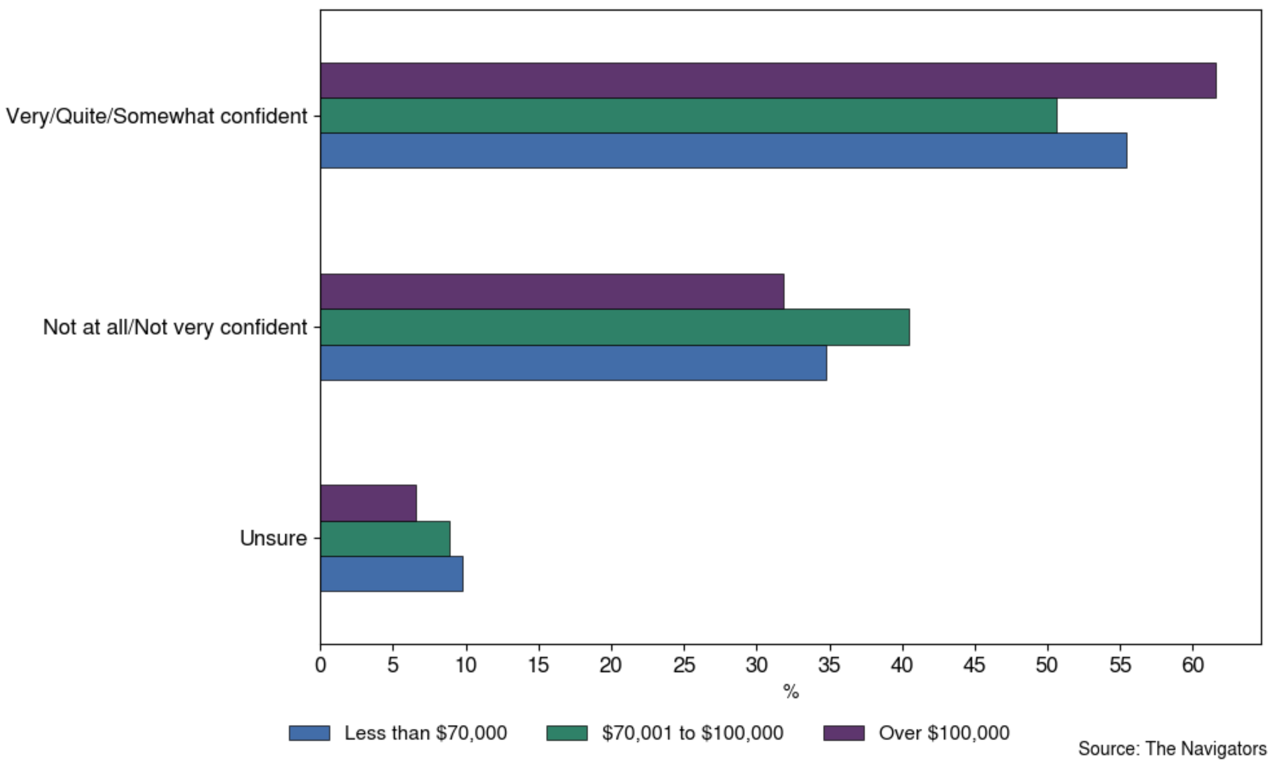
[4] The Consumer Advocacy Council in 2023 also concluded consumer awareness of Utilities Disputes remained low.

Figure 2: I know where to get help if my power company treats me unfairly, 2025 survey



3.9 We also looked at awareness by household income. Figure 3 shows no clear pattern in awareness by household income. Around 45% of those where household income was less than $70,000 p.a. were unsure or not confident about where to seek help, compared to 49% for those earning $70,000-$100,000, and 38% for those earning over $100,000.

Figure 3: I know where to get help if my power company treats me unfairly grouped by income

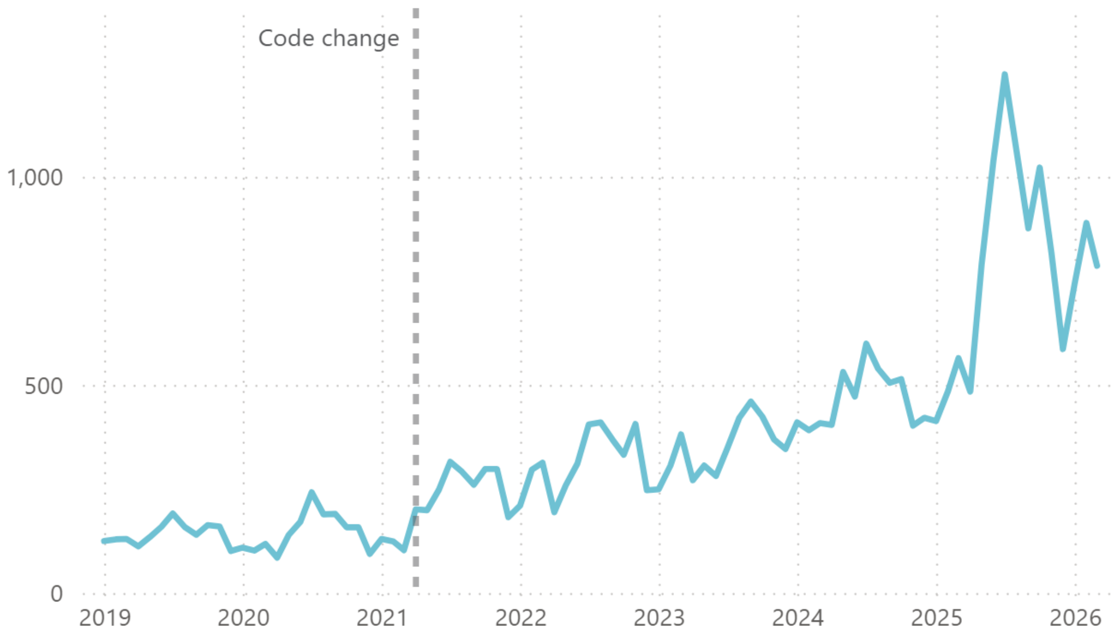


Source: The Navigators

3.10 Figure 4 shows the number of complaints received by Utilities Disputes before and after the Code change in April 2021. After a sharp increase in 2021, there has continued to be a gradual upward trend in complaints received by Utilities Disputes.

3.11 There is a general trend of increased calls during the winter periods with a particularly large spike in 2025. Information from Utilities Disputes indicates this was likely due to a combination of increased electricity costs and consumers having difficulty contacting their retailers because of long call centre wait times.

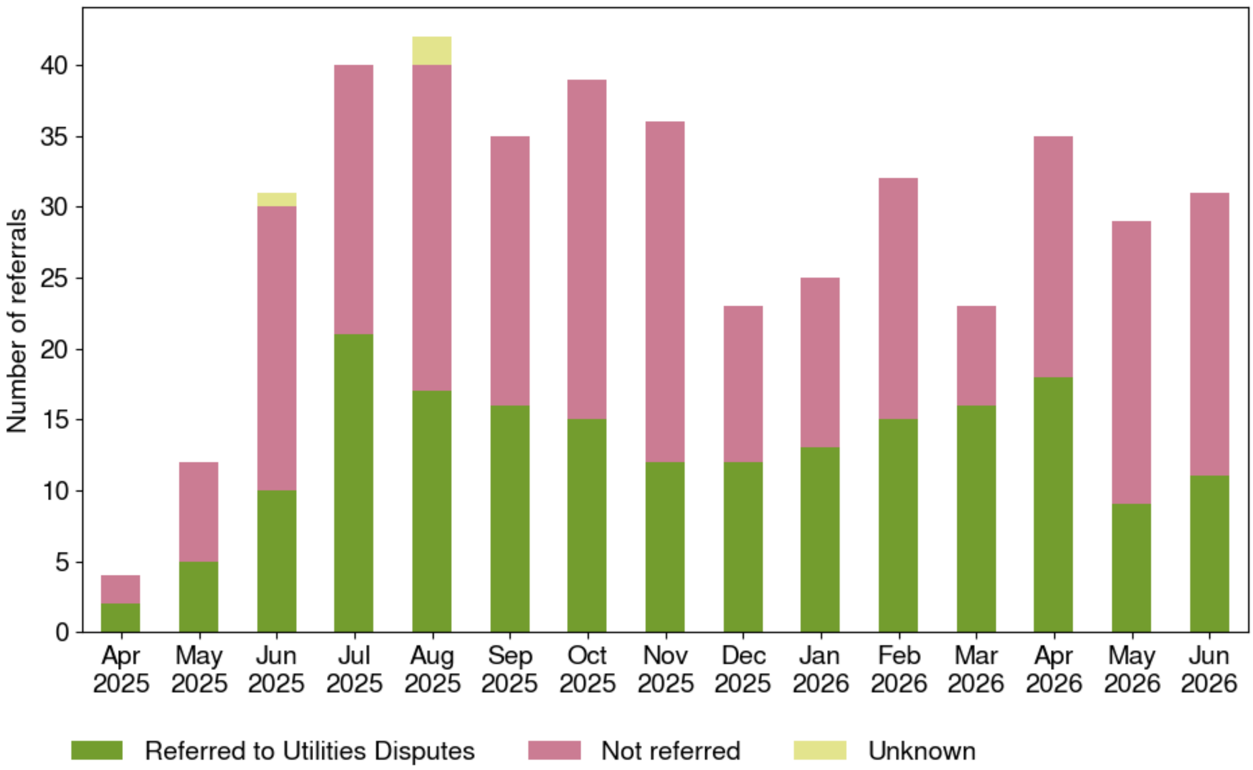
Figure 4: Monthly Utilities Disputes complaint data



Source: Utilities Disputes

3.12 Some of the increase in 2025 may also be linked to the introduction of the Authority's CCOs, including an advertising campaign through radio and social media that promoted Utilities Disputes services. Utilities Disputes noted a small rise in complaints from consumers who said they had heard about the service through the Authority or were referred by it. Figure 5 shows the monthly referrals to Utilities Disputes from the Authority since the implementation of Part 11A CCOs on 1 April 2025

Figure 5: Electricity Authority referrals to Utilities Disputes



Source: Electricity Authority

Good awareness of comparison and switching service

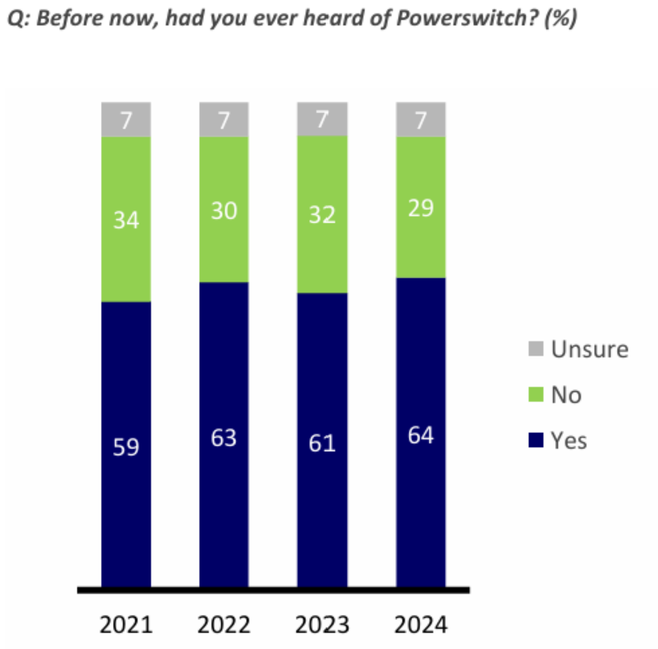
3.13 To consider consumer awareness and impact in regard to Powerswitch we looked for answers to:

(i) To what extent has consumer awareness of Powerswitch, as measured by the consumer sentiment survey, increased since the Code amendment was implemented?

3.14 Survey data indicates good awareness of comparison and switching services since the Code change. However, there is lower awareness and use of switching sites amongst lower income households.

3.15 Previous surveys directly asked, “Before now, had you ever heard of Powerswitch?”, which saw some consistency, with around 59-64%, of residential respondents annually stating they had heard of the service (Figure 6). This indicates that a large proportion of the population know of the comparison site and where to look to get a better deal or find a new electricity provider.

Figure 6: Awareness of Powerswitch, 2024 survey results

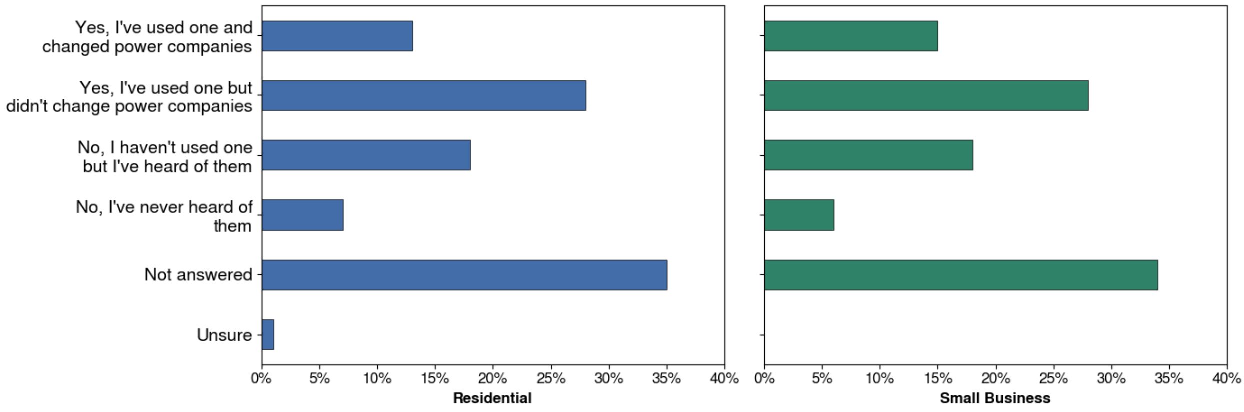


3.16 The 2025 survey asked about awareness and use of comparison and switching services more broadly, rather than Powerswitch specifically.

3.17 Figure 7 shows 41% of residential consumers have used an online comparison and switching service, while a further 18% said they were aware of one but have not used it. This suggests overall awareness of around 59%, consistent with previous surveys that asked specifically about Powerswitch.

3.18 Results were similar for small businesses, with 43% indicating using a comparison tool and 18% being aware of one but not using it.

Figure 7: Have you ever used an online comparison and switching service (free online tool to compare power companies or plans)?

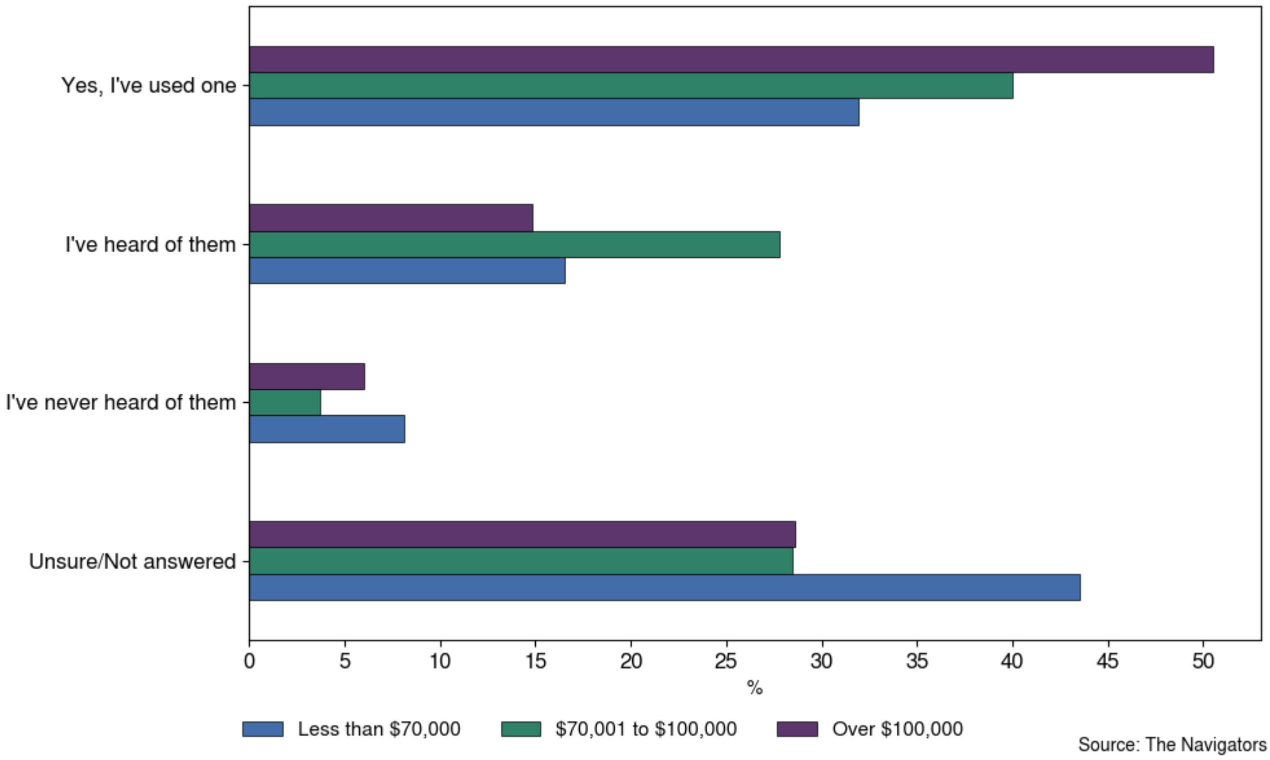


3.19 Figure 8 shows responses by income to whether people have ever used an online comparison and switching service.

3.20 Overall, it appears there is good awareness of this service. However, the data indicates that those who may benefit from using the site are less likely to know about it. More than half of those in lower income groups said they did not know about the service, compared with around 35-40% in higher income groups.

3.21 Among households earning over $100,000 p.a., around half have used a comparison and switching service, compared with 40% of those earning $70,000–$100,000 and 32% of those earning under $70,000.

Figure 8: Residential consumers knowledge of comparison and switching service grouped by income

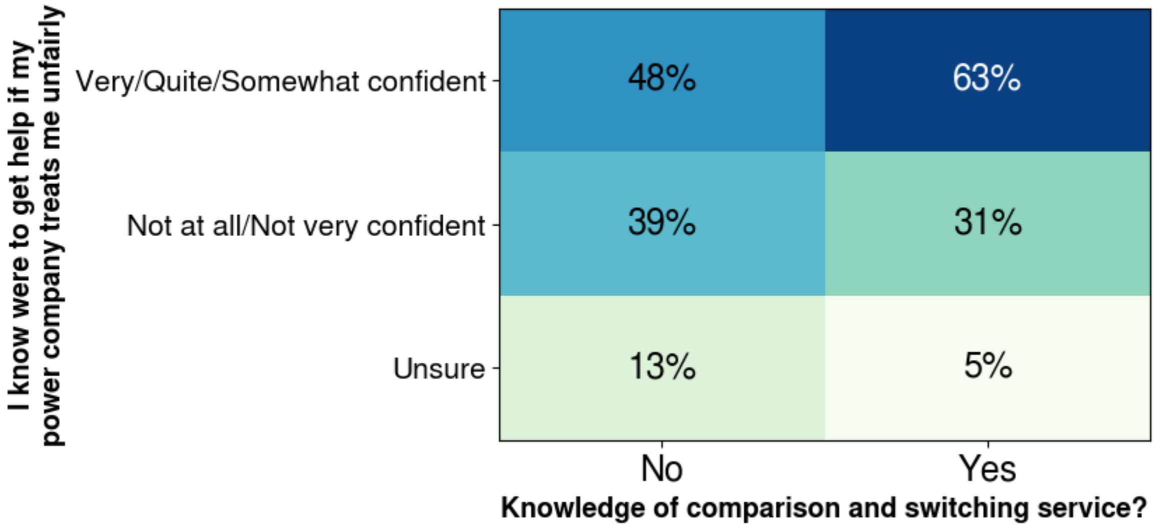


Source: The Navigators

There appears to be a marginalised group of consumers who have no awareness of either service

3.22 Figure 9 shows that more engaged consumers (those who are aware of comparison and switching services and/or have switched providers) are more likely to know where they can find help if needed. This suggests there is a less engaged group of consumers who may be missing out, and who could benefit from better, joined-up promotion of support services.

Figure 9: Heard of or used comparison and switching site and knowing how to seek help



Retailers and distributors have made good efforts to comply with the Code

3.23 As part of the Code implementation both retailers and distributors must provide clear and prominent information on their websites and in communications about dispute resolution services. Retailers must also provide clear communication about switching services. To look at whether retailers and distributors have complied with the Code we considered:

(i) Are retailers and distributors consistently providing clear and prominent information as required by the Code?

(ii) Which communications channels are used by retailers and distributors?

3.24 Generally compliance is good across reconciliation participants with any minor non-compliances usually resolved by the time the audits is submitted. This indicates that participants are trying to ensure awareness of both the dispute resolution scheme and switching services.

3.25 Recent audit reports[5] are available on the reconciliation participant and distributor register on our website.

3.26 Audit assessments noted a variety of methods including email, website links and interactive voice response (IVR) transcripts were used in customer facing communications for those compliant with these clauses in the Code.

3.27 At the time of writing this report, the latest distributor audits indicated that 50 distributors (including the 29 electricity distribution businesses and embedded networks)[6] were

[5] Reconciliation participants and distributors are subject to audit. The frequency of audits depends on their level of compliance. Under the Code, the Authority has discretion to set an audit interval anywhere between three and 36 months.

[6] There are also 27 embedded networks. The difference between number of distributors and audit reports reviewed is that some audit reports are yet to be published therefore were unavailable for assessment.

compliant, with one identified as non-compliant in providing clear and prominent information about Utilities Disputes (Part 11.30A of the Code).

3.28 The reconciliation participant audits showed that 29 retailers[7] were compliant and 8 non-compliant with requirements to provide clear and prominent information about Utilities Disputes (11.30A). For providing clear and prominent information on comparison services (11.30B), 29 were compliant and 7 non-compliant.

3.29 While some non-compliance occurs, it is usually limited to specific areas. For example, a retailer may not mention Utilities Disputes in a recorded phone message, even if the information is provided on bills and in emails.

3.30 Audits can cover multiple retailers or brands, including smaller subsidiary retailers (known as type 2 retailers). In these cases, non-compliance can occur if one of the brands is not adhering to 11.30A or 11.30B even if the others are.

3.31 Any significant non-compliance will be addressed through compliance plans, which are available on our website.

4. Considerations and recommendations

4.1 Information received from Utilities Disputes shows complaints have increased since the Code amendment came into effect. While this is an encouraging sign that awareness of dispute resolution services is increasing, overall, awareness remains low.

4.2 It should be noted that the Authority promotes referrals to Utilities Disputes related to the CCOs since their implementation on 1 January and 1 April 2025, with advertising of Utilities Disputes through radio and social media at the time of the Code introduction. The Authority has recently introduced new billing requirements, requiring retailers to include Utilities Disputes contact details alongside existing obligations.

4.3 To improve our monitoring of compliance with Clause 11.30A and the new schedules within Part 11A (CCOs), it is recommended that these new billing mandates are included in next year's retailer compliance survey.

4.4 Survey results show a reasonable level of awareness of online comparison and switching services across both the previous and updated surveys.

4.5 With the launch of Billy as an Authority-owned service, it is important to maintain or improve current awareness levels as the Authority moves on from its historic role funding Powerswitch. This will require retailers to update their communications and for the service to be promoted regularly, not just at launch. The Authority should encourage retailers to undertake more targeted outreach via different channels to reach lower-income households, who are less likely to be aware of or use these services. There is also an opportunity for Billy to make information about disputes resolution services more visible and accessible for different users of the site.

4.6 Minor overlap exists between clauses 11.30A–11.30C in Part 11, and the CCOs (in Part 11A). This overlap could be addressed by including a brief cross-reference to clauses 11.30A–11.30C in the CCOs to reduce repetition. However, it is recommended that the placement of consumer-related provisions within the Code be reviewed, and this duplication addressed at the same time. Currently, the dispute resolution and switching provisions sit

[7] These are type 1 retailers (those that buy and sell electricity from / to the clearing manager also known as traders). Retailers that buy electricity from a trader to then on sell to a consumer (type 2 and 3 retailers) do not fall under the existing audit process.

within Part 11 (registry information management), which is not intuitive. Establishing a dedicated, consumer-focused section of the Code would better align with the Authority's consumer care strategy and improve usability.

4.7 It is recommended that a review and update to the consumer sentiment survey is completed. This is to ensure more direct questions can be included to improve the quality of information collected. There should also be consideration around questions that will be relevant in relation to the Authority's retail data monitoring work and billing requirements.

Table 1: Actions from recommendations

Recommendation	Action	Progress
Monitor compliance with billing mandates	Include in 2026/27 retailer compliance self assessments	TBC – Consumer Compliance Projects team aware of recommendation
Maintain/Increase visibility of switching services	Discuss findings with Daylight to inform plans for advertising, specifically targeted outreach for lower-income households.	In scope of current plans
Increasing awareness of Utilities Disputes	Discuss prominence of advertising of this service via Billy platform	Ideas discussed, budget and priority to be confirmed
Update consumer sentiment survey	Look to update question formats to ensure useful information is being gathered; specifically consider more direct questions about consumer knowledge of dispute resolution services.	Question update recommendations provided to Retail Policy team
Dedicated consumer-focused section of the Code	Exploration of placement of consumer-related Code provisions.	TBD