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## Submission Default price-quality paths for electricity distribution businesses from 1 April 2025

Utilities Disputes Limited | Tautohetohe Whaipainga (UDL) welcomes the opportunity to comment on the Commerce Commission's *Default price-quality paths for electricity distribution businesses from 1 April 2025 Issues paper*.

### About us

UDL is an independent, not-for-profit company that provides fair and independent resolution of complaints and disputes between utilities companies and their customers when they are unable to be resolved between the parties.

UDL operate four dispute resolution schemes: the Government approved Electricity and Gas Complaints Scheme, Broadband Shared Property Access Disputes Scheme, a voluntary Water Complaints Scheme; and a private Telecommunications Scheme.

### Comment

We have confined our comments to the sections which appear to intersect with the issues that have been raised by consumers in complaints relating to the quality of their electricity supply and the role of their EDB. These relate to questions 15, 17 and 29.

#### ***Question 15 - Are there any other quality of service measures beyond those currently required within DPP3 that we should consider introducing, and why?***

The paper notes at Appendix F F167 and F168 SADI and SAIFI are "after the fact" and the introduction of "leading" indicators are preferable but challenging to identify and implement. Other measures suggested at F169 are around ordering a new connection, service performance (power quality) and customer service.

We see significant value in EDBs collecting and sharing this information. We are often required to consider whether a consumer's electricity supply is consistent with the guarantees contained in the Consumer Guarantees Act 1993. There is little objective standards or common reporting that can be applied. Expanding the service measures would appear to aid in meeting the objective of

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providing more leading indicators and lead to better outcomes. It would also assist generally in determining the appropriate standards for consumers. UDL collects customer complaint information across the industry that may be useful to the Commission if a customer service measure were developed.

***Question 17 - We are considering whether we should reduce the regulatory period from five to four years. What particular challenges do you perceive may arise from shortening the regulatory period? What are the potential benefits to consumers from maintaining or shortening the length of the regulatory period?***

We agree with the comment in the *Commerce Commission, Default price-quality paths for electricity distribution businesses from 1 April 2025: Proposed process 25 May 2023* paper - that reducing regulatory period to 4 years would help manage forecasting uncertainty by allowing for an earlier reset of the DPP.

This appears to be particularly pertinent given the unprecedented challenges facing the industry from decarbonisation, electrification and climate change. We believe consumers would benefit from the faster adaptation a shortened period allows.

***Question 29 - What models or data inputs could be provided by EDBs which would improve our approach to modelling consumer bill impact?***

UDL holds data on issues recorded in complaints and can split this into complaints received in different DPP periods. We can anonymise and share consumer complaint data relating to price changes that a consumer believes, or has been informed, relate to distribution pricing changes. Please let us know if this data would be useful for the Commission.

## Next Steps

If UDL can be of further assistance please contact Paul Moreno, Kaiwhakahaere Rangahau, Pūrongo | Research and Reporting Manager [REDACTED]

Yours sincerely

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Tautohetohe Whaipanga: Utilities Disputes Limited