

Information Disclosure for Water Services – Consumer Protection

Discussion paper

8 October 2026



Associated documents

Tuhinga āpiti

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24 February 2026	ISBN 978-1-991414-63-2	Information Disclosure for Water Services Regulatory Framework Paper
24 February 2026	ISBN 978-1-991414-64-9	Information Disclosure for Water Services Final Decision Summary Paper
20 August 2026	ISBN 978-1-997321-73-6	Which Tool when paper
20 August 2026	ISBN 978-1-997321-74-3	Statutory criteria and processes for our regulation of water services
7 September 2026	ISBN 978-1-997321-77-4	Water Services Information Disclosure Determination 2026

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Executive Summary

Whakarāpopotonga Matua

- X1 We are the economic regulator for water services and have complementary consumer protection powers for those services. Currently this applies to water supply and wastewater services for the entities that we regulate.
- X2 Information disclosure (**ID**) is the "ground floor" of our regulatory regime for water services. Through transparency, ID helps consumers, suppliers of regulated water services, regulators and other stakeholders understand how suppliers are performing and how that performance changes over time.
- X3 One of the performance areas we monitor through ID is consumer experience and protection. This focuses on the experience consumers of regulated water services have when interacting with their supplier, and includes vulnerable consumers.
- X4 The paper focuses on five themes that emerged through the policy development of the consumer protection provisions in Part 4A of the Commerce Act, stakeholder feedback and our work to date:
- > consumer information and engagement
 - > complaints information
 - > complaint handling, dispute resolution and redress
 - > billing and charging, and
 - > vulnerable consumers.
- X5 A significant amount of information relevant to consumer experience and protection already exists across the water sector. However, information may be collected for different purposes, reported in different ways, or not be readily available to stakeholders. In some cases, information may be difficult to compare across suppliers or assess over time.
- X6 This paper does not propose new information disclosure requirements or other consumer protection interventions. Instead, it seeks feedback on whether the identified areas are the right ones to focus on, whether sufficient information is currently available to understand them, and whether additional information may improve understanding of supplier performance and consumer experiences.
- X7 We will use submissions received in response to this discussion paper to help inform our assessment of whether changes to consumer protection-related information disclosure should be considered.

Chapter 1 Introduction

Kupu whakataki

Purpose of this discussion paper

Te pūtake o tēnei tuhinga matapakinga

- 1.1 We are the economic regulator for water services and have complementary consumer protection powers for those services. Our roles and functions in these areas are set out in Parts 4 and 4A of the Commerce Act (**the Act**).¹
- 1.2 Under the current regime, economic regulation and consumer protection apply to water supply and wastewater services provided by decision-making local government water service suppliers (**regulated suppliers**). These suppliers may include territorial authorities and council-owned water organisations responsible for making decisions about regulated water services.
- 1.3 The Act provides the option of extending this to other suppliers of water services, or to other water services (e.g. stormwater services) if the Minister agrees.²
- 1.4 Consumer protection encompasses a range of matters relating to how suppliers interact with consumers. This may include complaints processes, how suppliers consult with or provide information to consumers, billing practices, dispute resolution processes, the availability of redress where service issues arise, and how suppliers respond to vulnerable consumers.³
- 1.5 Information disclosure (**ID**) is the primary tool for economic regulation and currently applies across the water sector. Through ID, regulated suppliers publicly disclose information about their performance. We analyse that information and publish it in a manner that makes it easier to compare regulated suppliers and look at trends over time. This can help stakeholders better understand how services are being delivered and how supplier performance changes over time.⁴
- 1.6 The purpose of this discussion paper is to seek feedback on whether sufficient information is available to understand consumer experience and protection issues in water services, and whether additional ID may improve transparency and understanding of those issues.

¹ Commerce Act 1986.

² Commerce Commission “[Which Tool when paper](#)” (20 August 2026), para 1.12 and “[Statutory criteria and processes for our regulation of water services](#)” (20 August 2026), paras 2.11 - 2.16.

³ Commerce Commission “[Which Tool when paper](#)” (20 August 2026), para 2.37.

⁴ Commerce Commission “[Information Disclosure for Water Services Regulatory Framework Paper](#)” (24 February 2026) paras 72 - 76.

We are seeking your feedback

Kei te rāpu mātou i ō koutou whakaaro

- 1.7 As discussed in our Which Tool When paper, ID is the "ground floor" of our regulation for water services. It improves transparency, supports monitoring and helps us understand areas where further investigation or regulatory intervention may or may not be required.⁵
- 1.8 Consistent with our risk-based approach to regulation, we are interested in understanding whether sufficient information is readily available to assess key areas relating to consumer experience and protection.⁶
- 1.9 If additional information disclosure requirements are ultimately considered, it will be important to consider both the benefits of improved transparency and understanding, and the practical costs and implications of collecting, reporting and disclosing information.
- 1.10 Through the policy development of Part 4A,⁷ stakeholder feedback and findings from our work to date, five themes have emerged as areas where additional understanding may be useful:
- > consumer information and engagement
 - > complaints information
 - > complaint handling, dispute resolution and redress
 - > billing and charging, and
 - > vulnerable consumers.
- 1.11 We are seeking feedback on whether these are the right areas of focus, whether sufficient information is available to understand them, and whether additional ID requirements may improve transparency and understanding.
- 1.12 This paper is not consulting on introducing a service quality code, consumer protection regulations or dispute resolution regulations. Any future consideration of those tools would require, at a minimum, separate analysis and consultation.⁸

⁵ Commerce Commission "[Which Tool when paper](#)" (20 August 2026), paras 1.20 - 1.21 and 2.9 - 2.13.

⁶ Commerce Commission "[Which Tool when paper](#)" (20 August 2026), paras 1.22 - 1.26. Section 53(A) of the Act.

⁷ Department of Internal Affairs, "[Local Water Done Well stage 3: further decisions](#)" (8 August 2024)

⁸ Commerce Commission "[Statutory criteria and processes for our regulation of water services](#)" (20 August 2026), paras 2.11 - 2.16.

Structure of this paper

Te hanga o tēnei pepa

1.13 The remainder of this paper is organised as follows:

- > **Chapter 2** discusses what we mean by consumer protection in the context of water services and how it relates to our broader regulatory systems.
- > **Chapter 3** describes the information that is currently available about consumer protection.
- > **Chapter 4** explores the consumer protection areas we have identified and considers whether information may be limited in those areas.
- > **Chapter 5** discusses the types of information that may help improve understanding of those areas.

How to have your say

Mō te tuku kōrero mai

- 1.14 We welcome feedback on the matters discussed in this paper. Your feedback will help inform our understanding of consumer protection issues and whether changes to consumer protection-related ID should be considered.
- 1.15 We are particularly interested in your answers to the specific questions we have posed in **Attachment B**. We also welcome feedback on any matters raised in this paper, or any other relevant matters.
- 1.16 Submissions are due by **5pm on 26 November 2026**. **Attachment C** explains how to make a submission, including how to send your submission and how we handle confidential information, preferred file format and where to find our submission template.

Chapter 2 What do we mean by consumer protection?

He aha tēnei mea te tiakitanga kiritaki?

Understanding consumer protection

Hei whakamārama i te tiakitanga kiritaki

- 2.1 In this chapter, we discuss what we mean by consumer protection in the context of water services and how it relates to our broader regulatory system. This chapter also explains why ID may help stakeholders better understand supplier performance relating to consumer experience and protection.

Consumer experience and protection

Wheako kiritaki me te tiakitanga kiritaki

- 2.2 One of the performance areas we monitor includes *consumer experience and protection*, which focuses on the experience consumers, including vulnerable consumers, have when interacting with their supplier.⁹ This reflects the importance of understanding both the services consumer receive, and their experiences of interacting with the suppliers that provide those services. Consumer protection can include matters such as:

- > complaints processes
- > how suppliers engage with or provide information to consumers
- > billing practices, dispute resolution processes
- > the availability of redress where appropriate service standards are not met, and
- > how suppliers treat vulnerable consumers.¹⁰

- 2.3 These are the types of issues considered throughout this paper.

⁹ Commerce Commission “[Which Tool when paper](#)” (20 August 2026), Attachment A.

¹⁰ Commerce Commission “[Which Tool when paper](#)” (20 August 2026), para 2.37.

Consumer protection and economic regulation

Tiakitanga kiritaki me te waeture ohaoha

- 2.4 The purpose of Part 4A of the Act includes both consumer protection and improvements in the quality of services provided to consumers to reflect their demands. In this context, quality includes both the services consumers receive and their experiences of interacting with suppliers. This distinction is reflected in the performance areas we use to monitor regulated suppliers, including service and network performance, and consumer experience and protection.
- 2.5 While both Part 4 and Part 4A can contribute to quality outcomes, this paper focuses primarily on consumers' experiences of interacting with suppliers and whether their interests are adequately protected. This includes how suppliers communicate with them, respond to enquiries and complaints, explain bills and charges, and provide support when issues arise.
- 2.6 Many of these interactions are relevant to both economic regulation and consumer protection because they can influence the quality of services consumers receive. Our economic regulation tools and consumer protection tools can both help create incentives for suppliers to provide services at a quality that reflects consumer demands.¹¹
- 2.7 Part 4A provides tools specifically focused on consumer protection. These include consumer protection-related ID requirements, service quality codes and consumer protection regulations. These tools can be used where there are concerns that consumers' interests are not being adequately protected. This may include issues relating to complaints processes, dispute resolution, consumer information and the treatment of vulnerable consumers.
- 2.8 One way of thinking about the distinction is that economic regulation is largely concerned with outcomes consumers might reasonably expect if the market for water services was competitive. Consumer protection can go further by considering whether some consumers require protections that a competitive market alone may not necessarily provide.
- 2.9 One area where Part 4A goes beyond traditional economic regulation is its focus on vulnerable consumers. Part 4A includes tools that can be used to protect consumers who may be experiencing hardship or other vulnerabilities, such as consumers who have difficulty meeting payment obligations or who may require additional support when interacting with their supplier.

¹¹ Commerce Commission "[Which Tool when paper](#)" (20 August 2026), paras 2.39, 3.15 and 3.32.

- 2.10 If the Commission develops a service quality code, the legislation requires us to take reasonable steps to identify classes of vulnerable consumers and consider their interests when developing the code. This reflects the broader consumer protection focus of Part 4A.¹²
- 2.11 In practice, there is overlap between consumer experience and consumer protection. Many of the issues discussed in this paper may be relevant to both Part 4 and Part 4A. The purpose of this paper is not to draw a strict boundary between the two. Rather, it is to consider whether information is available to help stakeholders understand consumers' experiences of interacting with suppliers and whether consumer interests are being adequately protected.

Information as an indicator of consumer experience and protection

Ko te pārongo hei tohu i te wheako kiritaki me te tiakitanga kiritaki

- 2.12 ID is the "ground floor" of our regulation for water services and is generally the starting point for understanding performance concerns. Through transparency, ID helps consumers, suppliers, regulators and other stakeholders understand how suppliers are performing and how that performance changes over time.
- 2.13 However, there is no single measure that tells us how consumers experience their interactions with suppliers or whether consumers' interests are being adequately protected.
- 2.14 Consumer satisfaction information can provide one perspective. Complaints information can provide another. Information about billing practices, consumer engagement, dispute resolution processes and support for vulnerable consumers can also help build a broader picture.
- 2.15 None of these measures, on their own, provide a complete picture of consumer experience and protection. Rather, they are indicators that may help stakeholders understand how consumers experience interactions with suppliers and whether consumer interests are being adequately protected.
- 2.16 A key theme of this paper is that information may already exist in many of these areas. The question is whether that information is sufficiently available, consistent and comparable to support understanding of supplier performance over time and across the sector.¹³

¹² Commerce Commission "[Which Tool when paper](#)" (20 August 2026), paras 2.42 - 2.44 and 5.2 - 5.4 and Section 57ZI(3) of the Act.

¹³ Commerce Commission "[Which Tool when paper](#)" (20 August 2026), paras 3.20 - 3.23 and "[Information Disclosure for Water Services Regulatory Framework Paper](#)" (24 February 2026).

Chapter 3 What information is already available?

He aha te pārongo kua puta kē?

Information currently available

He pārongo kei te wātea i tēnei wā

- 3.1 This chapter describes the information currently available about consumer experience and protection and the sources through which that information is collected and reported.
- 3.2 A significant amount of information relevant to consumer experience and protection is already collected across the water sector. This information is available through our ID requirements, reporting systems administered by other agencies, supplier systems and consumer-facing processes. Together, these sources provide information about how consumers interact with suppliers, how suppliers respond to consumers, and consumers' experiences of those interactions.

Information disclosed under our requirements

He pārongo i whākina i raro i ā mātou herenga

- 3.3 The Water Services Information Disclosure Determination 2026 (the Determination) already requires suppliers to disclose a range of qualitative information relating to consumer experience through disclosures. These requirements were introduced as part of the initial ID regime for water services and provide a starting point for understanding consumers' experiences of interacting with their supplier. This paper builds on that work by considering whether additional information may assist stakeholders to better understand consumer experience and protection issues.¹⁴

Information about consumers and consumer expectations

- 3.4 Suppliers are required to identify the consumers and consumer groups that use their services, including their key characteristics and how they interact with or rely on water services. Suppliers must also describe how consumer expectations are identified and any actions proposed to address gaps between consumer expectations and service delivery.
- 3.5 This information provides insight into how suppliers understand the needs and expectations of the consumers they serve.

¹⁴ *Water Services Information Disclosure Determination 2026* [2026] NZCC 3, Schedule C, Clause C7 and Commerce Commission “[Information Disclosure for Water Services – Final Decision Summary](#)” (24 February 2026).

Information about complaints and customer service

- 3.6 Suppliers are required to describe their customer service practices and their approach to customer complaint resolution. They must also explain how complaints information is used within their organisation.
- 3.7 This information helps explain how suppliers interact with consumers and the role complaints information plays in operational decision-making and service improvement.

Information relating to charges and billing

- 3.8 The Determination also includes requirements relating to disclosures about household charges, usage charges, connection charges and growth charges.
- 3.9 These disclosures may be relevant to consumer experience and protection because they provide information about the charging arrangements consumers interact with and how information about charges is communicated to consumers.
- 3.10 As many of these requirements are new, the information is not yet available on a consistent sector-wide basis. We have not yet had an opportunity to assess the extent to which the disclosures will support understanding of consumer experience and protection across suppliers.

Information available through other regulatory systems

He pārongo e wātea ana mā ētahi atu pūnaha waeture

- 3.11 Information relevant to consumers is also collected through a range of other regulatory and accountability systems.

Ministry for Cities, Environment, Regions and Transport non-financial performance measures

- 3.12 The Ministry for Cities, Environment, Regions and Transport (MCERT) non-financial performance measures require suppliers to set levels of service and report on complaints relating to drinking water quality, drinking water pressure and flow, continuity of supply, wastewater services and supplier responsiveness. These measures provide an existing source of sector-wide complaints information.¹⁵

¹⁵ MCERT “[Non-Financial Performance Measures Rules 2024](#)” (July 2025).

- 3.13 We are undertaking separate work to develop performance measures for disclosing intended levels of service for water supply and wastewater services. Over time, these measures may replace the relevant non-financial performance measures currently set by the Secretary for Local Government. We expect to undertake further engagement on this work in 2027.

Water Services Act requirements

- 3.14 The Water Services Act 2021 requires drinking water suppliers to establish and maintain consumer complaints processes and report on those processes to the Water Services Authority – Taumata Arowai.
- 3.15 These requirements contribute to the broader information landscape relevant to consumer experience and consumer protection.

Information available through other arrangements

He pārongo e wātea ana mā ētahi atu huarahi

- 3.16 Information may also be available through dispute resolution providers and supplier systems.

Utilities Disputes Limited

- 3.17 Utilities Disputes Limited (UDL) receives and manages consumer complaints for participating members within its dispute resolution scheme. Through this role, it holds information relating to complaints, complaint categories, complaint outcomes and dispute resolution activities.¹⁶
- 3.18 This information may provide useful insights into consumer concerns, complaint outcomes and the operation of dispute resolution pathways.

¹⁶ UDL “[Submission on Water Services – Information Disclosure – Draft decision](#)” (28 October 2025).

Information held by suppliers

3.19 Suppliers may also collect a broader range of information through:

- > customer service systems
- > complaints processes
- > customer engagement activities
- > customer feedback mechanisms
- > service requests, and
- > operational practices.

3.20 Many suppliers also publicly provide information through customer charters, service commitments, complaints processes, websites and customer communications. Some suppliers have developed hardship policies, customer support arrangements and programmes targeted at particular groups of consumers.¹⁷

3.21 While some of this information is publicly available, other information may be used internally by suppliers to support service delivery, customer service and decision-making.

¹⁷ As an example, Watercare “[Watercare's financial hardship webpage](#)”, Tiaki Wai “[Tiaki Wai's hardship policy](#)” and Selwyn Water “[Selwyn Water's financial support information](#)”.

Preliminary observations

Ngā tirohanga tuatahi

3.22 A significant amount of information relevant to consumer experience and protection is already collected across the water sector and, in many cases, publicly disclosed or reported through existing frameworks. This includes information about:

- > consumer expectations
- > consumer satisfaction
- > complaints
- > customer service practices
- > consumer engagement
- > charges and billing arrangements
- > consumer groups, and
- > supplier interactions with consumers.

3.23 However, this information is collected through multiple systems and for different purposes. While it provides valuable insights, it is not yet clear whether the information currently available provides sufficient visibility of consumer experience and protection issues across the sector or supports meaningful comparisons over time and between suppliers.

3.24 The next chapter explores the consumer experience and protection areas identified through our work to date and considers whether there may be limitations in the information currently available.

Chapter 4 Are there potential information gaps?

He pārongo tērā pea kua mahue?

Areas for further exploration

Ngā wāhi atu anō kia tirohia

- 4.1 Chapter 3 described the information currently available about consumer experience and protection.
- 4.2 A significant amount of information is already collected across the water sector through ID requirements, regulatory reporting systems, supplier systems and consumer-facing processes. However, information may be collected for different purposes, reported in different ways, or not be readily available to stakeholders. In some cases, information may exist within supplier systems but not be publicly disclosed. In other cases, information may be available but difficult to compare across suppliers or assess over time.
- 4.3 Through the policy development of Part 4A, stakeholder feedback and findings from our ID work to date, we have identified a number of consumer experience and protection areas that may warrant further consideration in the context of ID. These areas relate to:
 - > consumer information and engagement
 - > complaints information
 - > complaint handling, dispute resolution and redress
 - > billing and charging, and
 - > vulnerable consumers.
- 4.4 The purpose of this chapter is not to suggest that concerns necessarily exist in these areas. Rather, we are interested in understanding whether sufficient information is currently available to help stakeholders understand these issues and assess supplier performance over time and across the sector.

Consumer information and engagement

Pārongo kiritaki me te whitiwhiti kōrero

- 4.5 Consumers rely on information from suppliers to understand services, service disruptions, prices, customer service arrangements and how to raise concerns.
- 4.6 Suppliers already undertake a range of engagement and communication activities. Existing disclosure requirements also provide information about consumer expectations, customer service practices and consumer satisfaction methodologies. However, while information on these activities exists, there may be limited visibility of:
- > how suppliers engage with consumers
 - > how effective communication approaches are
 - > how consumer feedback is incorporated into decision-making, and
 - > how consumer expectations and experiences change over time.
- 4.7 Stakeholders have also highlighted the importance of information being clear, accessible and useful to consumers.¹⁸
- 4.8 These limitations in the information currently available may make it difficult for stakeholders to understand how suppliers engage with consumers and how consumer needs and expectations are reflected in the delivery of services.

Complaints information

Pārongo amuamu

- 4.9 Information about complaints is already available through a range of sources, including non-financial performance measures, supplier systems, and dispute resolution schemes. Existing information provides some visibility of the types of complaints consumers raise and the number of complaints received.

¹⁸ Water New Zealand “[Submission on Water Services – Information Disclosure – Draft decision](#)” (28 October 2025), Invercargill City Council “[Submission on Water Services – Information Disclosure – Draft decision](#)” (28 October 2025) and UDL “[Submission on Water Services – Information Disclosure – Draft decision](#)” (28 October 2025).

4.10 However, approaches to collecting and reporting complaints information may vary between suppliers. There may be differences in:

- > how complaints are defined
- > how complaints are categorised
- > the level of detail collected
- > how complaints are recorded, and
- > how complaint information is reported publicly.

4.11 Stakeholders have highlighted the importance of consistent complaint definitions and categorisation to support comparability across suppliers. They have also noted that different organisations may use different systems and processes to collect and manage complaints information.¹⁹

4.12 Having different approaches may make it difficult to understand whether consumers are experiencing similar issues across suppliers, whether particular concerns are becoming more common over time, or whether suppliers are responding differently to those concerns.

Complaint handling, dispute resolution and redress

Te whakahaere amuamu, te whakatau tohe me te whakaea

4.13 Current information provides some visibility of complaints received and supplier approaches to complaint management. However, there appears to be less visibility of what happens after a complaint is raised.

¹⁹ UDL “[Submission on Water Services – Information Disclosure – Draft decision](#)” (28 October 2025).

- 4.14 In particular, there appears to be limited information available regarding complaint processes and outcomes, including:
- > how complaints are investigated
 - > how complaints are escalated
 - > how long complaints take to resolve
 - > complaint outcomes
 - > the availability and use of dispute resolution pathways, and
 - > the availability of redress where service issues arise.
- 4.15 Our review of publicly available information identified relatively little information relating to complaint escalation, redress and dispute resolution arrangements. Stakeholder feedback has similarly highlighted the importance of understanding what options are available when complaints cannot be resolved through normal customer service channels.²⁰
- 4.16 The current approach may make it difficult to understand whether consumer concerns are being addressed effectively and whether consumers have access to appropriate pathways for escalation when concerns remain unresolved.

Billing and charging

Te whakarite nama, utu hoki

- 4.17 Suppliers already provide consumers with information relating to bills and charges through a range of channels, including customer communications, planning documents and websites. Existing ID requirements also provide visibility of charges and charging arrangements.
- 4.18 However, stakeholders have identified billing and charging as an area of consumer interest, particularly as charging arrangements change and consumers become more directly engaged with bills and pricing structures. In this context, the issue is not the level of charges, but how charging arrangements are communicated to consumers and how consumers experience and understand those arrangements.²¹

²⁰ UDL “[Submission on Water Services – Information Disclosure – Draft decision](#)” (28 October 2025).

²¹ UDL “[Submission on Water Services – Information Disclosure – Draft decision](#)” (28 October 2025) and Fincap “[Submission on Water Services – Information Disclosure – Draft decision](#)” (28 October 2025).

- 4.19 The issue may not be whether billing and charging information exists, but whether sufficient information is available to understand consumers' experiences of billing and charging arrangements. This may include understanding:
- > how suppliers communicate billing and charging information
 - > whether consumers can readily understand charging arrangements
 - > how changes in charging arrangements are communicated
 - > consumer concerns relating to bills and charging structures, and
 - > how approaches differ across suppliers.
- 4.20 This may make it difficult to understand whether consumers can readily understand their bills and charging arrangements or identify the types of billing issues that are generating consumer concern.

Vulnerable consumers

Kiritaki noho whakaraerae

- 4.21 Vulnerable consumers, including consumers experiencing hardship, emerged as an area of interest through the development of Part 4A of the Act, stakeholder feedback and our review work to date.²² While some information relating to consumer groups and support arrangements already exists, there may be limited visibility of how suppliers identify vulnerable consumers and respond to their needs in practice.
- 4.22 Existing disclosure requirements require suppliers to identify consumer groups and explain how different groups interact with and rely on services. Some suppliers have also developed hardship policies, customer support arrangements and consumer assistance programmes. However, there may be limited visibility of:
- > how suppliers define and identify vulnerable consumers
 - > the support arrangements available to vulnerable consumers
 - > how suppliers assess the effectiveness of those arrangements, and
 - > how approaches differ across suppliers.

²² UDL “[Submission on Water Services – Information Disclosure – Draft decision](#)” (28 October 2025) and Fincap “[Submission on Water Services – Information Disclosure – Draft decision](#)” (28 October 2025).

- 4.23 This may make it difficult to understand whether vulnerable consumers are being identified and supported consistently across the sector and whether existing support arrangements are meeting consumer needs.

Preliminary observations

Ngā tirohanga tuatahi

- 4.24 A significant amount of information relevant to consumer experience and protection already exists across the water sector. However, there may be areas where information is difficult to compare, not routinely disclosed, or not readily available to stakeholders.
- 4.25 These observations do not necessarily indicate poor consumer outcomes or shortcomings in existing arrangements. Rather, they identify areas where additional information may improve understanding of consumer experience and protection and help stakeholders assess supplier performance more consistently across suppliers and over time.

Chapter 5 What information could help improve understanding of these issues?

He aha ngā momo pārongo hei whakamārama pai i ēnei take?

Exploring potential information options

Te whiriwhiri i ētahi ara pārongo

- 5.1 Chapter 4 explored areas relating to consumers' experiences of interacting with regulated suppliers where information may be limited, difficult to compare, or not readily available to stakeholders.
- 5.2 As we discussed in Chapter 3, a significant amount of information relevant to consumer experience and protection already exists through information disclosure requirements, other regulatory reporting systems, supplier systems and consumer-facing processes.
- 5.3 This chapter explores the types of information that may improve understanding of the issues identified in Chapter 4. Under each area we have included a table that identifies information that may be relevant to understanding those issues.
- 5.4 We have not formed a view on whether additional ID requirements are necessary. Instead, we are seeking feedback on whether the information currently available is sufficient, and if not, whether there are opportunities to improve its visibility by enhancing existing disclosure requirements or by requiring disclosure of information currently available through other systems or processes.
- 5.5 In some cases, the issue may not be whether information exists, but whether it is readily available, consistently reported, comparable across suppliers, or sufficient to support understanding of performance over time and across the sector.

Consumer information and engagement

Pārongo kiritaki me te whitiwhiti kōrero

- 5.6 As we have mentioned in earlier chapters, existing ID requirements already require suppliers to disclose information relating to consumer expectations, customer service practices and consumer satisfaction methodologies. These disclosures provide a degree of visibility of how suppliers engage with consumers and respond to consumer needs.

- 5.7 However, additional visibility in this area may help stakeholders better understand consumer priorities, common consumer concerns and how consumer experiences change over time. Additional information or requirements may also improve the ability to compare consumer experience across suppliers.
- 5.8 We are interested in views on whether the existing requirements provide sufficient visibility of consumer information and engagement, or whether stakeholders and interested parties would benefit from additional information in this area.

Table 5.1 Potential information about consumer information and engagement

Potential relevant information	How this improves understanding
Summary information about consumer feedback themes and trends	Understanding common consumer concerns and priorities
Consumer satisfaction measures and key feedback themes	Additional context on consumer experiences

Complaints information

Pārongo amuamu

- 5.9 Existing information about complaints is available through a range of sources, including non-financial performance measures, supplier systems and dispute resolution schemes. This provides a degree of visibility of the types of complaints consumers raise and the number of complaints received.
- 5.10 However, differences in complaint definitions, categorisation and reporting approaches may make it difficult to compare information across suppliers or identify broader patterns and trends over time.
- 5.11 Additional visibility of complaints information may improve understanding of consumer concerns, support comparisons across suppliers and help identify emerging or systemic issues. This may be particularly useful where complaints are defined and categorised consistently across suppliers.
- 5.12 We are interested in views on whether existing complaints information provides sufficient visibility of consumer concerns, or whether additional requirements would improve understanding.

Table 5.2 Potential information about complaints information

Potential relevant information	How this improves understanding
Total complaints received	Visibility of consumer concerns and changes over time
Complaints by category and type	Understanding of the types of issues consumers experience

Potential relevant information	How this improves understanding
Complaints relative to customer numbers	Supports comparisons across suppliers of different sizes
Recurring or systemic complaint themes	Identification of emerging and systemic issues
Year-on-year complaint trends	Understanding of changes in consumer experiences over time

Complaint handling, dispute resolution and redress

Te whakahaere amuamu, te whakatau tohe me te whakaea

- 5.13 Existing information provides some visibility of complaints received and supplier approaches to complaint management.
- 5.14 However, there may be less visibility of what happens after a complaint is raised, including how complaints are resolved, escalated and addressed. This may make it difficult to understand supplier responsiveness and the options available to consumers when concerns remain unresolved.
- 5.15 Additional visibility in this area may improve understanding of complaint outcomes, dispute resolution pathways and the consumer experience of complaints processes. To support meaningful comparisons across suppliers, stakeholders may also wish to consider whether information in these areas would benefit from consistent definitions or reporting approaches.
- 5.16 We are interested in views on whether existing information provides sufficient visibility of these matters, or whether additional disclosure would improve understanding.

Table 5.3 Potential information about complaint handling, dispute resolution and redress

Potential relevant information	How this improves understanding
Complaint resolution timeframes	Visibility of supplier responsiveness
Complaints resolved within target timeframes	Understanding of performance against supplier processes
Complaint outcomes and redress provided	Visibility of how complaints are resolved and the types of remedies or redress provided to consumers.
Escalation pathways	Understanding of options available to consumers
Access to dispute resolution arrangements	Visibility of consumer support options

Billing and charging

Te whakarite nama, utu hoki

- 5.17 Existing disclosure requirements already provide visibility of charges and charging arrangements. Suppliers also provide information about billing and charging through a range of consumer-facing communications.
- 5.18 However, there may be less visibility of consumers' experiences of billing and charging arrangements, including how information is communicated, how changes in charging arrangements are explained and the types of concerns consumers raise.
- 5.19 Additional visibility in this area may improve understanding of how consumers experience billing and charging arrangements and support comparisons of consumer-facing practices across suppliers. This may be particularly useful where approaches to communicating billing and charging information differ across suppliers.
- 5.20 We are interested in views on whether existing information provides sufficient visibility of these issues, or whether additional disclosures would improve understanding.

Table 5.4 Potential information about billing and charging

Potential relevant information	How this improves understanding
Billing-related complaints	Visibility of consumer concerns relating to billing
Information about pricing changes and how they are communicated	Visibility of consumer-facing communications
Consumer-facing billing information	Understanding of how information is presented to consumers

Vulnerable consumers

Kiritaki noho whakaraerae

- 5.21 Part 4A places particular emphasis on vulnerable consumers and existing information provides some visibility of consumer groups and supplier support arrangements. Some suppliers also publish hardship policies, customer support arrangements and assistance programmes.
- 5.22 However, there is currently limited visibility of how suppliers identify vulnerable consumers, the support available to them and how approaches differ across suppliers. This may make it difficult to understand how vulnerable consumers are supported across the sector. Definitions and approaches also vary between suppliers, making comparisons difficult.

- 5.23 Additional visibility in this area may improve understanding of suppliers' approaches, available support arrangements and how suppliers respond to the needs of vulnerable consumers, while ensuring the protection of consumer privacy.
- 5.24 We are interested in views on whether existing information provides sufficient visibility of these matters, or whether additional disclosure would improve understanding.

Table 5.5 Potential information about vulnerable consumers

Potential relevant information	How this improves understanding
How suppliers define and identify vulnerable consumers	Visibility of supplier approaches
Support arrangements available to vulnerable consumers	Understanding of available support mechanisms
Hardship policies and assistance programmes	Visibility of support arrangements
Arrangements for medically dependent consumers	Understanding of support measures for specific consumer groups
How suppliers assess the effectiveness of support arrangements	Visibility of monitoring and continuous improvement

Preliminary observations

Ngā tirohanga tuatahi

- 5.25 The information categories discussed in this chapter are not proposals. Rather, they are examples of information that may help improve understanding of the issues discussed in Chapter 4.
- 5.26 We are interested in:
- > whether we have identified the right areas of focus
 - > whether existing information provides sufficient visibility of those areas
 - > whether additional or enhanced disclosure would improve understanding, and
 - > any practical considerations we should take into account when considering future ID requirements.
- 5.27 We will use submissions received in response to this discussion paper to help inform our assessment of whether changes to consumer protection-related ID should be considered.

Attachment A Glossary

Kupu taka

Term/Abbreviation	Definition
Commerce Act	Commerce Act 1986.
Commission	Commerce Commission.
Complaint	Means an expression of dissatisfaction, consistent with 57Y of the Commerce Act.
Consumer	Means a person who consumes, uses, is provided with, or benefits from the provision of a water service and includes a person who is liable to pay a serviceability charge under section 88 of the LGWS Act, as defined under Schedule 7, clause 2(1) of the Commerce Act.
Consumer experience	Refers to the experience consumers have when interacting with their water service provider, including through customer service, complaints processes, billing, communications, consultation and other interactions with the supplier.
Consumer experience and protection	One of the Commission's performance areas used to monitor the performance of regulated suppliers. It focuses on the experience of consumers, including vulnerable consumers, in their interactions with their water service supplier.
Consumer protection	Refers to protecting consumers' interests in relation to water services, including how suppliers interact with consumers and respond to their needs. Consumer protection may include matters such as complaints processes, the provision of information to consumers, billing practices, dispute resolution processes, redress and support for vulnerable consumers. It also includes improvements in the quality of service provided to consumers that reflect consumer demands.
Determination	The Water Services Information Disclosure Determination 2026
Economic Regulation	Refers to a way of influencing the performance of suppliers in certain sectors (such as the water sector) which are important to people's lives, and where issues such as market power (including monopolies) may otherwise lead to outcomes that do not reflect the long-term interests of consumers, including in relation to the price and quality of products and services supplied.
ID	Information disclosure
MCERT	The Ministry for Cities, Environment, Regions and Transport.
Regulated suppliers	Organisations that our ID requirements would apply to, consistent with section 57D of the Commerce Act 1986.

Attachment B List of feedback questions

Rārangi o ngā pātai mai

Questions

Chapter 2: What do we mean by consumer protection?

- Q1 Are there parts of consumer experience and protection that we have not identified in this chapter?

Chapter 3: What information is already available?

- Q2 Are there additional sources of information relevant to consumer experience and protection that we should consider?

Chapter 4: Are there potential information gaps?

- Q3 Have we identified the right areas of focus for this work? If not, what additional areas relating to consumer experience and protection should we consider?
- Q4 Are there areas where the information currently available is insufficient to understand consumer experience and protection issues? If so, why?
- Q5 Are there any definition, classification or reporting issues that make information difficult to understand or compare?
- Q6 Of the areas discussed in this chapter, which should be prioritised for any further consideration in this tranche of work and why?

Chapter 5: What information could help improve understanding of these issues?

- Q7 What additional information, if any, would most improve understanding of the areas discussed in Chapter 4?
- Q8 If additional information disclosure requirements are considered, which information categories should be prioritised and why?
- Q9 What practical considerations, costs or implementation issues should we take into account when considering additional consumer protection-related information disclosure?

Attachment C Submission process

Tukanga tāpaetanga

How to have your say

Mō te tuku kōrero mai

- C.1 We would like your feedback on our discussion paper on whether changes to consumer protection-related information disclosure should be considered. Stakeholders may respond to all or some of the questions in the discussion paper. We also welcome feedback on any matters raised in the paper, or any other relevant matters.
- C.2 We have created a template for your feedback. We encourage stakeholders to use our template, but it is optional. You can access the submission template [here](#).
- C.3 Responses must be emailed to wai@comcom.govt.nz with 'Submission: Information Disclosure for Water Services – Consumer Protection Discussion paper' in the subject line. Please clearly state in your email that you consent to your submission being made public or if not – why not (see the section below).
- C.4 Please state whether you are submitting as an individual or on behalf of an organisation.
- C.5 Please provide your feedback to us no later than by **5pm, 26 November 2026**.
- C.6 We require submissions in both a format suitable for word processing (such as a Microsoft Word document) as well as a 'locked' format such as PDF for publication on our website. Please ensure that any submitted documents are not password protected.

Confidential submissions

Tāpaetanga matatapu

- C.7 We intend to publish your feedback on our website to ensure our process is transparent. However, it is important not to publish information that is confidential information which could be commercially sensitive or personal. We understand that publishing confidential information could cause harm to the provider of the information or a third party.
- C.8 If your feedback includes confidential information, we request that you provide us with a confidential and a public version. We propose publishing the public versions of your feedback on our website.

- C.9 We note that responsibility for excluding confidential information from the public version rests on the party providing the feedback.
- C.10 Where confidential information is included in feedback:
- C.10.1 the information should be clearly marked and highlighted in yellow, and
 - C.10.2 both confidential and public versions of feedback should be provided by the due date.
- C.11 All information we receive is subject to the principle of availability under the Official Information Act 1982 (**OIA**). There are several reasons that we may withhold information requested under the OIA from disclosure. This could be in the event that:
- C.11.1 release would unreasonably prejudice the commercial position of the supplier or subject of the information
 - C.11.2 withholding the information is necessary to protect the privacy of natural persons, and
 - C.11.3 we received the information under an obligation of confidence, and if we were to make that information available it would prejudice the supply of similar information to us (by any person) where it is in the public interest that such information continues to be supplied to us.
- C.12 We will not disclose any confidential or commercially sensitive information in a media statement, public report, or in response to a request, unless there is a countervailing public interest in doing so in a particular case. Such cases are likely to be rare and would be discussed with you in advance of any publication.