



July 2025

Hon Chris Bishop
Minister of Infrastructure
Parliament Buildings
Wellington 6160

Dear Minister

Enclosed is the annual Code Performance Report from the New Zealand Utilities Advisory Group (**NZUAG**) Board, collated from the annual returns supplied by Utilities Operators and Corridor Managers as prescribed by the *National Code of Practice for Utilities Access to Transport Corridors* (**the Code**) drafted in accordance with the Utilities Access Act 2010.

The objective of the report is to fulfil the obligations set out in 8.2 of **the Code**, measuring the effectiveness of **the Code** in line with its purpose.

Previous reports can be found on the NZUAG website; <https://nzuag.org.nz/national-code-compliance-reports/>.

If you have any questions, please contact me directly.

A handwritten signature in blue ink, appearing to read 'Jim Donovan', is written over a light blue circular stamp.

Jim Donovan
Independent Chair
NZUAG
chair@nzuag.co.nz



Report on the Performance of the

National Code of Practice

for

Utility Operators' Access to Transport

Corridors

2023/24

NZUAG

June 2025

Introduction

Under the provisions of the *National Code of Practice for Utility Operator's Access to Transport Corridors*, (the Code), the New Zealand Utilities Advisory Group (NZUAG) is required to report to the Minister for Infrastructure on the performance of the Code on an annual basis. The NZUAG is required to analyse the Code's performance, and to identify whether "Code compliance, operational understanding or quality control processes need attention and whether any amendments to the Code are necessary" (Code 8.2.3)

This report provides an analysis and interpretation of the 2023/2024 Key Performance Data (Code 8.2.2) collected from industry in the latter 2024 and early 2025.

Summary

There are two issues the NZUAG has highlighted in the previous reports provided to the Minister, namely the return rates and the subjectiveness of the returns. This under reporting has been a key challenge for the NZUAG to providing any insights into the performance of the Code.

For this reporting year, the NZUAG Board sought to increase focus on uplifting performance return rates. The focused effort on return rates was successful in providing the best response since 2019/20 at over 70%. This more complete dataset and other learnings will likely see this rate continue to improve in the 2024/25 collection.

The subjectiveness of the returns was an issue that the NZUAG were not able to resolve for this report, however the NZUAG have a pathway that will see an improvement for our 2024/25 report.

The data provides two contradictory indicators. A direct comparison between 2019/20 shows two key metrics, which represent performance, with significant improvement. Yet a different indicator, the mandatory liaison meetings, shows a high level of non-compliance to the Code.

Background

The *National Code of Practice for Utility Operator's Access to Transport Corridors* is a mandatory Code of Practice established under the provisions of the Utilities Access Act 2010. All corridor managers, and utility operators seeking to access transport corridors, are governed by its provisions. NZUAG is the industry-approved guardian of the Code, and is responsible for its oversight, implementation and review. To assist in monitoring the Code's effectiveness, a set of key performance measures are specified in the Code, against which all corridor managers and utility operators are required to report annually.

The list of required measures is contained in section 8.2.2 of The Code:

- **Corridor Managers** are required to report on:
 - The number of Corridor Access Requests (CARs) submitted each year;
 - The number of completed Works Completion Notices (WCN's) received each year;
 - The number of non-conformance notices (NCN's) issued each year;
- **Utility Operators** are required to report the number of known third party damages incidents during that year.

The 2023/24 report on Code performance represents the sixth year of formal reporting.

Methodology

All corridor managers and utility operators were asked to provide data relating to the mandatory reporting requirements, the questions used to collect the data are set out in Appendix 3.

Corridor Access Requests (CARs)

In order to allow a comparative analysis between Territorial Local Authorities (TLA’s), and to account for variability between respondents and the fact that the number and identity of responses vary between years, a derived measure of *Total individual utility operator CAR equivalents per 1000 network km’s* has been introduced. This is an amalgamation of:

- a) the reported number of single utility operator CARS submitted;
- b) respondent estimates of the number of individual CARs that would have been required had utility operator global cars not been available or multiple street CARs issued.

These numbers were then divided by the centre-line length of each Corridor Manager’s road network to allow comparability between different Corridor Manager’s.

Works Completion Notices (WCN’s)

While the analysis of CARs used a measure of total equivalent CARs, (including allowances for Global CARs and Multiple Street CARs), reported WCNs that relate to individual CARs have been used as there is a 1:1 correspondence between CARs and WCNs. This comparability is difficult if Global CARs and multiple street CARs are included in the analysis.

Strikes

Utility Operators of water, electricity, gas and telecommunications assets were asked to provide the total number of strikes on their assets for 2023/24. These numbers are normalised by dividing total strikes by the total network length for each utility sector, allowing cross-utility sector comparisons.

Survey Results and Analysis

Response Rate

The following graph highlights the response rate for the past six years.

	Response rate by year					
Sector	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Corridor Managers	55%	78%	49%	37%	34%	73%
Electricity	38%	77%	58%	39%	19%	58%
Gas	100%	80%	83%	100%	60%	80%
Telecommunications	40%	46%	33%	27%	17%	60%
3 Waters	36%	46%	30%	5%	10%	49%
Utility overall rate	40%	55%	40%	20%	15%	58%

Table 1

Corridor Manager CAR numbers

The following table shows the total number of CARs reported by respondents for the last six years

	Year					
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Single CAR's submitted	38,661	46,314	38,924	71,355	41,608	41,770
Equivalent Individual CAR's	112,365	78,386	162,887	204,674	148,189	159,256
Total	151,026	124,700	201,811	276,029	189,797	201,026
Total per 1000km roading	3,896	3,209	2,925	3,695	2,860	2,836

Table 2

Works Completion Notices (WCN's)

The following table provides a comparison of WCN to UO CARs submitted for the last six years.

	Year					
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
WCN's/CARs submitted	0.64	0.44	0.43	0.46	0.54	0.80

Table 3

Strikes on Utility Operator Assets

The following tables shows the total number of strikes by sector followed by a comparative table normalising the strikes per 1000km of network

Sector	Reported Utility Strikes					
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
3 Waters	2,084	2,435	1,102	158	210	387
Electricity	375	1151	456	1667	84	302
Gas	970	558	325	663	198	471
Telecommunications	10,133	8,501	7,265	4,992	3,751	3,699

Table 4

Sector	Strikes per 1000km of network					
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
3 Waters	64	58	52	68	15	13
Electricity	34	14	17	8.3	32	5.6
Gas	40	73	43	24	46	34
Telecoms	65	77	58	36	24	19

Table 5

Liaison meetings

Liaison meetings are a mandatory requirement in the Code, Corridor Managers must hold them, and Utility Operators must attend. Of those that responded, 29% of Corridor Managers did not hold a liaison meeting. It is reasonable to extrapolate that the 27% of Corridor Managers that did not respond to the mandatory data collection through a LGOIMA request would push this number to 45%.

Conclusion

The focused effort on return rates was successful in providing the best response since 2019/20 and enabled learnings that will see this rate continue to improve in the 2024/25 collection. Feedback from those surveyed has suggested a refinement of this process in future years.

In previous years, the survey return rate, despite the mandatory reporting requirement in the Code, has not been at a level to enable analysis or comparison with any certainty. This year the scope of the

survey has been reduced to the core metrics outlined in the Code and the utilisation of the Local Government Official Information and Meetings Act (LGOIMA) to improve the return rate. Table 1 highlights that this approach has been successful, with the return rate increasing from 28% in the previous period to 64% this period.

The subjectiveness of the returns is an issue that the NZUAG were not able to resolve for this report. The NZUAG have been investigating existing data availability from current New Zealand Transport Agency (NZTA) work programmes such as Asset Management Data Standard (AMDS) and Consistent Condition Data Collection (CCDC) as well as Corridor Manager platforms used for the management of CAR's, MyWorksites and Submitica, to provide more consistency with the data. There is a pathway now to use this information for our next year's report.

A direct comparison to the 2019/20 results indicates, in the key metrics of Strikes per 1000km and Work Completion Notices per CARs, that the Code is improving performance (Table 6), based on the premise that more work has been completed with less strikes and more adherence to processes set out in the Code.

	Response rate		Strikes per 1000km		WCN/CARs		Total CARs	
Sector	2019/20	2023/24	2019/20	2023/24	2019/20	2023/24	2019/20	2023/24
RCA rate	78%	73%			0.44	0.80	124,700	201,026
Electricity	77%	58%	58	13				
Gas	80%	80%	14	5.6				
Telecoms	46%	60%	73	34				
3 Waters	46%	49%	77	19				
Utility rate	55%	58%						

Table 6

The returns also covered liaison meetings held by the Corridor Managers, as these are seen as critical to the success of the Code. With almost half of Corridor Managers not holding these mandatory meetings it highlights a very different picture on the Code's performance and although we are unable to compare this number to previous years it highlights a clear lack of understanding of the Code.

The NZUAG will use the learnings to improve on our reporting for the 2024/25 year, if the Minister has any information that they would like collected then please let us know prior to the end of August. As part of the work programme this year we will make liaison meetings a clear focus.

As part of the last Code Review changes an obligation was added for the NZUAG to 'report on how the industry is tracking toward zero Service Strikes in 2050 (8.2.3 Information Reporting). The comparative table above (Table 6) highlights a significant drop in strikes per 1000km in the 4 years and suggests that the industry is tracking in the right direction.

Appendix 1: Utility letter



NZ Utilities Advisory Group (Inc)
PO Box 25 414 Wellington 6140
Ph. 027 242 6506 Email: info@nzuag.org.nz
Web: www.nzuag.org.nz

[Organisation]
[Address]
[Address]
[Address]

[date] October 2024

Dear Sir or Madam

**National Code of Practice for Utility Operators' Access to Transport Corridors (Code)
compliance return 2023-24**

I am writing on behalf of the New Zealand Utilities Advisory Group (NZUAG), to request the annual submission of data as required by the Utilities Access Act 2010 (the Act). NZUAG is the regulatory industry body that administers the *National Code of Practice for Utility Operators' Access to Transport Corridors* (Code) and we are legally obliged to report the findings from this annual collection to the Minister and industry each year.

The National Code of Practice provides a nationally consistent approach for managing utility operators' access to transport corridors and is published on the NZUAG website www.nzuag.org.nz/national-code. **Compliance with the Code is mandatory under the Act.**

The information we are required to collate for the **2023/24** year, is set out in the attached form and is designed to meet the reporting requirements of the Code (Sections 8.2.2 and 8.2.3).

Given the mandatory nature of the Code, the NZUAG is seeking formal acknowledgement that the information provided by each Corridor Manager and Utility Operator is correct. Consequently, please provide such acknowledgement with your response.

The data collected is useful for all organisations in that it can provide a basis for industry benchmarking. The previous year's report can be found on the NZUAG website [Code compliance reports](#). Your data should be sent to our administrator Colin Lewis at info@nzuag.org.nz by the due date, **29 November 2024**. Please contact Colin if you have any questions.

Yours sincerely

Myles Lind (Chair)
Code Performance, Interpretation & Disputes Committee
New Zealand Utility Advisory Group

Appendix 2: RCA and Utility letter (those subject to Local Government Act)



NZ Utilities Advisory Group (Inc)
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Web: www.nzuag.org.nz

[Organisation]

[Address]

[Address]

[Address]

[date] October 2024

Dear Sir or Madam

Official information request: National Code of Practice for Utility Operators' Access to Transport Corridors (Code) compliance return 2023-24

I am writing on behalf of the New Zealand Utilities Advisory Group (NZUAG), to request the annual submission of data as required by the Utilities Access Act 2010 (the Act). NZUAG is the regulatory industry body that administers the *National Code of Practice for Utility Operators' Access to Transport Corridors* (Code) and we are legally obliged to report the findings from this annual collection to the Minister and industry each year.

The National Code of Practice provides a nationally consistent approach for managing utility operators' access to transport corridors and is published on the NZUAG website www.nzuag.org.nz/national-code. Compliance with the Code is mandatory under the Act.

Please supply the following information in the attached page under the Local Government Official Information and Meetings Act (LGOIMA):

If you need any more information from me, please let me know as soon as possible by emailing. I understand that a decision on a request for information under the LGOIMA should be made within 20 working days of receiving that request. If you do not normally deal with official information requests, or you need advice on dealing with this request, guidance is available from the Ombudsman at www.ombudsman.parliament.nz.

Yours sincerely

Myles Lind (Chair)
Code Performance, Interpretation & Disputes Committee
New Zealand Utility Advisory Group

Appendix 3: Information request

Road Corridor Manager Questions (in relation to Utility Operator CARs)

Number of Corridor Access Requests (CARs)

- How many CARs were submitted for the period 1 July 2023 - 30 June 2024?
- What percentage of these were submitted as Global CARs under the provisions of the National Code of Practice (s4.3.1.3)?
- Please estimate how many individual site CARs would have had to have been submitted instead of these Global CARs

Number of Works Completion Notices (WCNs)

- How many WCN's did you receive for the period 1 July 2023 - 30 June 2024?

Number of Non-Conformance Notices (NCNs)

- How many Non-Conformance notices were issued for the period 1 July 2023 - 30 June 2024?
- How many CAR inspections required remedial actions?
- How many liaison meetings did you facilitate for the period 1 July 2023 - 30 June 2024, in accord with the provisions of the National Code of Practice (s2.7.2)?
- What is the total centre-line km length of your transport corridor?

Utility Operator Questions

- What utility type are you responding for? (Water if applicable)
- How many Utility Strikes did you record against your own underground assets within transport corridors for the period 1 July 2023 - 30 June 2024?
- In how many of these incidents had plans been requested?
- Did you or a member of your organisation attend any liaison meetings this year in accordance with s2.7.2?
- How long is your distribution network within transport corridors (total km)?