
From: Louise May Privacy of natural persons
Sent: Privacy of natural persons
To: Defining Energy Hardship
Cc: Privacy of natural persons
Subject: Feedback on Defining Energy Hardship

Tēnā koe,

Thank you for the opportunity to contribute to the development of definitions for energy hardship and wellbeing in Aotearoa which are for the purpose of better positioning the Government to help those in need. Rather than responding to the online survey MBIE is using to gather feedback for this consultation, we wish to make a few brief comments here (see below).

Ngā mihi nui,

Louise May (She/Her)
National Policy Advisor
Citizens Advice Bureau NZ, Ngā Pou Whakawhirinaki o Aotearoa

The CAB regularly helps people with enquiries relating to energy use for their homes and kāinga, including enquiries about their energy bills and suppliers. In the past year, we have had over eight hundred energy-related client enquiries. This experience gives us some insights into the common issues people experience in trying to get the energy they need for the health and wellbeing of themselves and their whānau.

The common issues our clients bring to us are:

- Unexpectedly high bills
- Other billing issues – additional fees and charges they were not expecting
- Poor customer service – difficulties getting hold of their utilities providers to resolve the issues they are experiencing.

An Energy Wellbeing Framework

We support the proposed definition of energy wellbeing: *When individuals, households and whānau are able to obtain adequate energy services to support their wellbeing in their home or kāinga.*

However, the connected factors that can contribute to a household's energy wellbeing or hardship, as outlined in the discussion document, do not reflect an important way in which the energy providers themselves can impact on their customers' ability to maintain an adequate and reliable supply of energy to their homes or kāinga; that is, the accessibility of suppliers to their customers.

As stated earlier, one of the common reasons for people seeking our help for energy-related issues is where the client is having difficulties getting hold of their provider. This is particularly an issue with companies that are pushing to have online-only engagement with their customers, and where they are not providing other, reliable channels for communication. An online-only approach is making it more difficult for some customers – many of whom are vulnerable – to easily contact their providers when they need to, in order to manage their energy accounts and payments and maintain their connections to energy supply.

The digital-only approach affects a wide range of people, including for reasons of digital access/skills/confidence, trust (security and privacy), literacy, language, health, disability, and geography. In the past year 13% of the energy-related client enquiries we received involved clients identified as being digitally excluded. The shift to online-only

can also affect clients who *do* have digital access and skills, where, for example, the information online does not meet their needs and they have to phone the provider, but their calls to the company do not get through. The inability to contact the supplier can cause significant stress and anxiety for our clients, especially for those on limited incomes where there may be an urgent need to resolve a problem so that supply can be maintained, or they can meet other basic expenses.

Client enquiry examples

- The client's energy account is in arrears, and he is confused and unsure about this. He has tried contacting the company by phone but has not been able to get through, and he cannot contact them online as he does not have online access.
- The client has moved house and needs to get his home connected up for power. He has approached a local energy retailer, but they refused to connect him because the client does not want broadband as well (he does not use computers).
- The client's energy company has billed him for two billing periods that he has already paid for – the client's account records clearly show the mistake. The client, who is unable to contact the company online, has tried phoning but without any success so far.

Our recommendation

While the issues of digital access and digital literacy are acknowledged under 'Household resources' and 'Service literacy' respectively as factors that can contribute to a household's energy wellbeing or hardship, the flipside of those issues is the extent to which energy providers ensure their services are accessible to all people, including those who are digitally excluded, and people who may, for whatever reason, find they can't resolve their issue online and need to speak with someone instead.

Therefore, we recommend that the factors affecting energy wellbeing and hardship include the accessibility of energy retailers to their customers, and that the definition of accessibility includes the provision of multiple channels – not just digital - through which customers can communicate and engage with their providers.