

Privacy of natural persons

Page 2: We will keep your information safe

Q1

Yes

Have you read and understood the Privacy Statement?

Page 3: About you

Q2

What is your name?

Sunil Unka

Q3

What is your email address? We may need to contact you for clarification on your submission, or regarding Official Information Act requests. Your email address will not be used for any other purpose.

Privacy of natural persons

Q4

Organisation

Are you submitting as an individual or on behalf of an organisation?

Q5

If on behalf of an organisation, what is its name?

Flick Electric Ltd

Q6

Energy retailer

If on behalf of an organisation, which of these best describes it?

Page 4: Proposed Definition for energy wellbeing

Q7

Agree

To what extent do you agree or disagree that the proposed definition for energy wellbeing is right for Aotearoa?

Q8

Do you have comments on why have you chosen this answer?

Flick agrees with the proposed definition. In our view, household income and the ability to afford to purchase essentials results in trade-offs between food, energy, schooling etc.

Q9

Agree

To what extent do you agree or disagree with the inclusions in the proposed definition?

Q10

Respondent skipped this question

Do you have any comments on what is included in the definition?

Q11

Agree

To what extent do you agree or disagree with what is excluded by the definition?

Q12

Do you have any comments on what is excluded by the definition?

Flick suggests it makes sense to initially exclude energy for transport from the definition with the intention it is added later. The definition is about 'energy' services not just electricity. Affordability impacts the ability to 'purchase' transport and New Zealanders' experience with COVID-19 has shown the ability to travel impacts householders' wellbeing.

Q13

Do you have any further comments on the proposed definition of energy wellbeing? - Is it clear and easy to understand?- Do you think there is anything missing?- Is it relevant to you and your community?

Flick queries whether 'obtain' is the right word in the definition ("... obtain adequate energy services ..."). Obtain has a wider connotation than being able to 'afford' energy services. For example, a remote community may not 'obtain' a reliable supply of energy but does that mean a community is suffering from energy hardship.

Page 5: Proposed framework for energy wellbeing

Q14

Agree

To what extent do you agree or disagree that the framework represents the factors that influence energy wellbeing in Aotearoa?

Q15

Do you have comments on why have you chosen this answer?

Flick suggests the framework must recognise that it is not only large households that can be in energy hardship but also people on their own or retired with insufficient income.

We note the ability to access off-peak prices can be impacted by the work hours of the household's income earners (eg working nightshifts).

Literacy about all the details on energy (for example, supply, prices, appliances, insulation, consequences of non-payment etc etc) as well as incomes and overall household circumstances impact people's ability to manage their energy wellbeing.

Q16

Do you have any other comments on the proposed framework? You may want to consider:- The layout of the framework, and if it is easy to understand - If anything is missing, or should be added- Which factors you think are most significant in your community

With this wide range of factors contributing to energy hardship/wellbeing, Flick queries if and how the most appropriate policy interventions to move households along the energy hardship/wellbeing spectrum will be identified and prioritised. Maybe a base allowance for energy costs (for example, the Winter Energy Payment) or incentivising investment in energy efficiency for low income households would be the simplest and cost effective initial steps.

Page 6: Proposed indicators for energy wellbeing

Q17

Agree

To what extent do you agree or disagree with the proposed indicators for energy wellbeing?

Q18

Do you have comments on why have you chosen this answer? You may want to consider: - Are the indicators comprehensive?- Are there any other indicators of energy wellbeing that should be considered?

Flick suggests under "Able to obtain – access: Access to a reliable energy supply when needed" could include being able to choose a reliable energy supply. This would mean the householders are benefiting from a competitive market to supply them with energy.

One of the proposed measures is being "Able to afford energy bills without borrowing or economising on other expenses". To get to the point of not 'economising on other expenses' a household is may have made a choice / decision about whether to prioritise paying an energy bill by the due date. Literacy about the consequences of this decision is important. Is this decision point more important or captured in the analysis?

Page 7: Measuring energy hardship

Q19

Yes

We are proposing to use a set of primary and secondary measures for energy hardship. Do you support this proposal?

Q20

Do you have comments on why you have chosen this answer?

No comment

Q21

Neither agree nor disagree

To what extent do you agree or disagree with the proposed primary measures?

Q22

Neither agree nor disagree

To what extent do you agree or disagree with the potential secondary measures?

Q23

Do you have any comments on the proposed primary and secondary measures? You may want to consider:- How many primary and secondary measures you think we should consider- Which measures you think should be primary or secondary (and why)

Flick notes that “P8: could not pay electricity, gas, rates of water bills on time (more than once)” may be too restrictive. Presumably this is ‘more than once each year’? The current measure catches mistakes – when someone forgot to pay a bill and then paid it the day after the due date. This proposed measure also overrides electricity retailers’ credit cycle processes (which may be triggered for non-payment after 30 days or after a threshold of amount in arrears is triggered). We suggest the measure be changed to ‘could not pay 2 consecutive bills for electricity, ...’

We suggest the secondary measure “P12: absolute energy expenditure half the national median or less (moving line)” is too specific and may miss some people in energy hardship (for example, large households with above average consumption). Not refrigerating food can be an indicator of not being able to afford energy.

Q24

Do you have any comments on measuring the depth of hardship? You may want to consider: - If we should use these measurements in Aotearoa, in addition to the primary and secondary measures- Combining measures (i.e. a DEP-17 style approach) - Measuring the energy hardship gap

Flick notes the data source frequency for a number of the measures is infrequent. People may be moving house more often than these measures are taken.

We support maximum use of the information that is currently being collected as well as any outputs available from analysis of that historic dataset.

The work by the Ministry of Housing and Urban Development on measuring housing quality sounds invaluable to the analysis of energy hardship. It is not clear when this work will be complete / implemented. (mentioned on page 43 of the discussion paper)

Also The Living in Aotearoa survey sounds very interesting. There is insufficient information in the discussion document (page 49) to know whether this survey might supplement or could supersede some of the other proposed measures.

We note the objective to have a national measure of energy hardship and to be able to track this over time. It is imperative that analysis of all of the proposed measures provides the government with insights that enable well targeted policy interventions for particular households to address energy hardship. Analysis should reveal the key factors that are driving energy hardship, and these factors can be expected to change over time.

Q25

Rank the following proposals in order of most important (1) to least important (4).

| | |
|--|---|
| Further analyse any currently available data | 1 |
| Work to fill existing data gaps/limitations | 3 |
| Model required energy use for households in Aotearoa | 2 |
| Research energy hardship-related indicators | 4 |

Q26

Do you have any suggestions for alternatives or changes to the proposed way forward? You may want to consider:- Are there gaps in the measurement we haven't identified?- Are there data sets or measures you know of that should be included?- Do you have any other suggestions for future analysis?

No comment

Page 9: Final thoughts

Q27

Do you have anything else you would like to mention?

Each year there are ~1,600 extra deaths ultimately attributable to energy hardship and cold damp houses. Work to address this suffering is essential.

Flick is also concerned about the cost of electricity and the ability of gentailers to manage wholesale electricity prices which impacts delivering competition and innovation to all electricity consumers. That is, the outcomes in the wholesale market have flow-on effects to other parts of the energy sector. These issues, evidenced in the Electricity Authority's Wholesale Market Review, are directly relevant to energy hardship and must be addressed.

Q28

Yes

Can we publish your submission on the MBIE website? If your submission contains personally identifiable information that should not be made public, please make clear what can and cannot be made public. For example, information about other people that you are sharing without their consent or information about children. Your name, and that of your organisation will be visible. Email addresses will not be visible.
