

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?

Tom Kane

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 **Individual**

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

Q5 **Respondent skipped this question**

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

Q6 **Respondent skipped this question**

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?

I broadly agree with the proposed definition of energy wellbeing. However, recent publications on energy hardship have emphasised the importance of the emotional side of energy hardship. Especially, the shame and embarrassment surrounding debt and asking for help (for example see - Emotions and fuel poverty: The lived experience of social housing tenants in the United Kingdom - ScienceDirect). I suggest that this is considered in the definition, which could read 'when individuals, households and whānau are able to attain energy services to support their wellbeing in their home or Kāinga without shame or embarrassment'.

Q9

Agree

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

Q10

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

I agree that the focus should be on households – at the heart of the energy hardship concern is the ability individuals to keep their home warm and healthy.

Q11

Disagree

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?

I understand the rationale for not including transport cost at this time. However, the suggested definition uses the term 'energy services' and over the coming years energy services will include the distributed energy value of battery storage provided by EVs. The high capital cost associated with EV purchases means that low-income households, many of which are in energy hardship, cannot benefit from lower fuel costs or the energy services that an EV battery will enable. This problem will be exacerbated as the transition continues and petrol becomes more expensive and harder to access. Although it is impractical for the energy hardship definition to include transport now, it should be noted that you cannot fully understand energy hardship without thinking about poverty or inequality.

Q13

Respondent skipped this question

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?

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?

I agree that all of the items shown in the framework have some influence on energy wellbeing. It is helpful to establish the complexity of factors involved. However, the diagram is misleading as it implies (inadvertently I'm sure) that all of the items are equal.

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

The diagram downplays the fact that income and housing quality are the two most important factors leading to energy hardship. If an individual has a high enough income, they can overcome all of the other obstacles. If an individual is living in a passive house, they should be able to maintain a healthy temperature with minimal energy cost.

I suggest more thought is taken in the presentation of the framework so that it recognises that there are many factors at play, while acknowledging that they are not all equal.

One major omission from the framework is household costs. Variation in rent, mortgage payments, groceries and transport will vary significantly between households and this variation will impact the extent to which households can afford energy services.

Page 6: Proposed indicators for energy wellbeing

Q17

Neither agree nor disagree

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?

The first four indicators are helpful but the rest are unlikely to provide valuable/additional insights. They are aspirational but not measurable. For example, 'A dwelling that can maintain a healthy temperature' – a passive house may be able to maintain a healthy temperature with little or no heating, but all other homes will require heating, so the question is how much and is it affordable? This is already better expressed in the 4th indicator 'Able to heat, wash, cook and use other energy services as required to stay comfortable without having to forego other necessities'.

Page 7: Measuring energy hardship

Q19

Unsure

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?

I understand the need to put interim measures in place but the limitations of the objective measures are significant.

The lack of overlap between the objective and subjective measures is concerning. If the objective measures show one group is the least at risk of energy hardship while the subjective measure suggests that they are most at risk, as is evident for age and ethnicity, one has to question the measures. I expect that the subjective measures are a more accurate indicator of energy hardship. This issue is discussed in the report and I support further analysis of the data.

Specifically, I'd be interested to see if absolute poverty is a better indicator of energy hardship than the proportion of income spent on energy? Does it overlap with the subjective measures more closely than the objective measures based on energy spend?

One item that is missing in the analysis is a measure that relates to homeownership. Part of extreme energy hardship is not having the ability to change your circumstances. Most homeowners are in the position to improve the energy efficiency of their home or move to a house that is easier to heat. This lack of power or utility emphasises the importance of considering the emotional aspects of energy hardship.

In addition, I would like to see a firm commitment (with a timeline) to transition to a better objective/quantitative measure based on the difference between energy spent on energy and the modelled energy requirement to maintain a healthy environment. I acknowledge that there are limitations to this methodology – for example, a household that is out of the house for most of the day may report much lower spend on energy than required yet still have a healthy temperature during occupied hours. But, in general it is a much more suitable approach and mandating energy performance certificates for all homes is several other benefits for Government in the areas of housing and carbon policy. They will enable minimum standards for homes that can be strengthened overtime and encourage a national retrofit programme to improve the existing housing stock. Overtime this will help improve energy wellbeing as the average home in the stock is warmer and drier.

Q21

Neither agree nor disagree

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

Q22

Agree

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)

I support the use of secondary measures. I believe that they will provide a rich insight in the range of energy hardship outcomes.

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

I support measuring the depth of energy hardship. I would like to see NZ working towards the UK approach of measuring the fuel poverty gap but I can also see the benefit of using an approach that counts the number of indicators.

I would be keen to see more analysis on the potential to apply depth of energy hardship measures.

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?

My suggestions are outlined in the answers to previous questions.

Page 9: Final thoughts

Q27

Respondent skipped this question

Do you have anything else you would like to mention?

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.
