

# 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?

Paul Moreno

**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?

Utilities Disputes

**Q6**

Other (please specify):

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

Dispute Resolution

Page 4: Proposed Definition for energy wellbeing

**Q7**

**Strongly agree**

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

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**Q8**

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

We agree with your focus on the concept of consumers rather than customers this is also reflected in the Consumer Care Guidelines recently developed by the Electricity Authority.

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**Q9**

**Strongly agree**

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

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**Q10**

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

We agree with different substitute types of energy that support wellbeing being included. We see cases of hardship at UDL where consumers use different sources of energy.

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**Q11**

**Strongly agree**

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

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**Q12**

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

We agree that commercial and transport types of energy should not be included. We agree that energy hardship is centred on use of energy within a dwelling, for domestic purposes.

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**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?

We believe the proposed definition of energy wellbeing is well defined and thorough.

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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?

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**Q15**

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

We believe the proposed framework is well considered and thorough.

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**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

We believe the service literacy section could include a measure of awareness and access to services available to resolve energy related disputes. This could be measured directly through consumers' use of UDL and surveying consumers' awareness of UDL. We believe the degree of market competition could be included in the energy prices section.

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Page 6: Proposed indicators for energy wellbeing

**Q17**

**Agree**

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

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**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?

We believe the proposed indicators of energy wellbeing are well considered and thorough. These measures could include access to dispute resolution should a consumer be unable to resolve any issues with retailers or distributors.

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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?

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**Q20**

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

We are unsure why P3 and P4 were chosen as primary measures when many of the secondary measures could be seen to be as equally harmful. We see complaints at UDL from consumers who are experiencing hardship in many forms, the proposed measures reflect that hardship is not always economic.

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**Q21**

**Agree**

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

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**Q22**

**Agree**

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

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**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)

We believe there are a good range of secondary measures. As with the primary measures, we see complaints at UDL from consumers who are experiencing hardship in many forms, the proposed measures reflect that hardship is not always economic.

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**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

No additional comments.

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Page 8: Data gaps and proposed way forward

**Q25**

**Respondent skipped this question**

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

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**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?

We believe the most important aspect to focus on is finalising the primary measures of energy hardship.

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Page 9: Final thoughts

**Q27**

Do you have anything else you would like to mention?

We collect data at UDL that may also be useful when looking at indicators of energy hardship. Each complaint received at UDL is tagged with categories. Many of these categories are potentially indicators of energy hardship, for example issues of: difficulty in payment, forced transfer to prepay, disconnection due to difficulty in payment. Although only a portion of complaints come to UDL (with the majority of complaints being resolved within companies' internal processes) UDL holds data across the industry as all retailers and distributors are required to be members.

We can track and provide data systemic issues in cases where energy hardship is an issue, within a set of prescribed indicators.

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**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.

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