Privacy of natural persons

Page 2: Privacy statement

Q1

Yes

I have read and understand the Privacy Statement above. Please select 'Yes' if you wish to continue

Page 3: Submission information

Q2

What is your name?

Kate Day

Q3

Yes, I give consent to my name being published

Do you consent to your name being published with your submission?

Q4

What is your email address? Please note this will not be published with your submission.

Privacy of natural persons

Q5

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

Page 4: Submitting on behalf of an organisation

Q6

If on behalf of an organisation, we require confirmation you are authorised to make a submission on behalf of this organisation.

Yes, I am authorised to make a submission on behalf of my organisation

Organisation

What is your organisation's name? Please note this will be published with your submission.

Christian Action Aotearoa

Q8	Registered charity
Which of these best describes your organisation? Please tick one.	
Page 5: Confidentiality	
Q9	No, my submission may be published in its entirety
would like my submission or parts of my submission to be kept confidential	
Page 6: Please upload a publishable version of your su	Ibmission
Q10	Respondent skipped this question
Please provide your reasons and grounds under section 9 of the Official Information Act that you believe apply, for consideration by MBIE.	
Q11	Respondent skipped this question
Please provide publishable versions of your submission in both Word and in PDF by uploading them here - clearly labelling both "for publication"	
Page 7: SECTIONS OF INTEREST	
Q12	HEALTH OF THE HOME KETE,
Which sections would you like to provide feedback on?	KNOWLEDGE AND NAVIGATION KETE,
	ENERGY ACCESSIBILITY AND CHOICE KETE,
	ENERGY AFFORDABILITY KETE,
	CONSUMER PROTECTION KETE

Page 8: HEALTH OF THE HOME KETE

Q13

Yes

Do you broadly support the proposed strategy HH1?

Q14 Please share your comments on the proposed strategy HH1. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.	Respondent skipped this question
Q15 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q16 Do you broadly support the proposed strategy HH2?	Yes
Q17 Please share your comments on the proposed strategy HH2 . For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.	Respondent skipped this question
Q18 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q19 Do you broadly support the proposed strategy HH3?	Yes

Q20

Please share your comments on the proposed strategy HH3. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

The Government must improve monitoring and enforcement of the Healthy Homes Standards, by requiring landlords to get independent inspections to prove compliance.

Right now tenants have very little power compared to landlords, and many do not raise concerns about non-compliance with the Healthy Homes Standards for fear of rent rises or eviction. This detriments housing quality and the health and mental health of tenants.

To fix this, the Government should amend the Residential Tenancies Act to put the onus on landlords to proactively prove compliance with the Healthy Homes standards (just as commercial landlords must with the commercial building WOF). The Government should require landlords to get a certificate of compliance from an independent, reputable assessor, and to lodge this with Tenancy Services. Tenancy Services should then publish these proof of compliance certificates in a publicly searchable database, so that tenants can easily access the information about their homes. Tenancy Services should proactively impose penalties on landlords who do not lodge health homes compliance certificates.

It will not work to rely on the Tenancy Compliance and Investigations Team because they can never monitor compliance across so many hundreds of thousands of properties.

Q21	Yes
Do you broadly support the proposed strategy HH4?	

Q22

Please share your comments on the proposed strategy HH4. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Yes, tenancy advocacy and support services need to be significantly strengthened. To fix this, the Government should fund the Tenant Advocate Network and tenant advocacy services across the country.

Q23 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q24 Do you broadly support the proposed strategy HH5?	Yes
Q25 Please share your comments on the proposed strategy HH5. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.	Respondent skipped this question

Q26 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q27 Are there any other key challenges and/or corresponding solutions relating to HEALTH OF THE HOME KETE that we have missed? If so, please outline these below.	Respondent skipped this question
Page 9: KNOWLEDGE AND NAVIGATION KETE Q28 Do you broadly support the proposed strategy KN1?	Don't know/not sure
Q29 Please share your comments on the proposed strategy KN1. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.	Respondent skipped this question
Q30 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q31 Do you broadly support the proposed strategy KN2?	Yes
Q32 Please share your comments on the proposed strategy KN2. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.	Respondent skipped this question
Q33 Do you broadly support the proposed strategy KN3?	Yes

Q34	Respondent skipped this question
Please share your comments on the proposed strategy KN3. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.	
Q35	Respondent skipped this question
Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	
Q36	Don't know/not sure
Q36 Do you broadly support the proposed strategy KN4?	Don't know/not sure
-	Don't know/not sure Respondent skipped this question
Do you broadly support the proposed strategy KN4?	

Do you broadly support the proposed strategy KN5?

Q39

Please share your comments on the proposed strategy KN5. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Perhaps, so long as it doesn't duplicate what exists on CAB, Consumer NZ, Sustainability Trust, Gen Less and Tenancy Services websites.

Q40

Respondent skipped this question

Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Q41

Yes

Do you broadly support the proposed strategy KN6?

Q42

Please share your comments on the proposed strategy KN6. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Yes. We would like to see the Electricity Authority empower consumers to make informed choices, with the following regulation:

1) Require retailers to provide clear, consistent information on bills, including:

- Pricing plan, electricity price, and whether that is higher or lower than average for similar households in their area.

- Electricity consumption in the last month and the last year, and whether this is higher or lower than average for similar households in their area.

2) Enable price-comparison sites to work well, by:

- Requiring retailers to give each pricing plan a unique code and load those into Registry as a new field, so it is clear which pricing plan is in use at each ICP. Enable reputable price-comparison websites to download this data. (This would overcome the problem that most customers have no idea what pricing plan they're on, and their bills don't tell them. If this information was stored in registry they could simply input their physical address then the site could compare their current pricing plan with alternatives.)

- Enabling price-comparison websites to directly enter into agreements with metering service providers to receive consumers' usage data immediately (with consumers' permission and meeting standards around data security).

This would enable 30-minute usage data to be used by these sites, so that customers could see the best plan for their exact usage.

Respondent skipped this question

Respondent skipped this question

Q43

Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Q44

Are there any other key challenges and/or corresponding solutions relating to KNOWLEDGE AND NAVITATION KETE that we have missed? If so, please outline these below.

Page 10: ENERGY ACCESSIBILITY AND CHOICE KETE

Q45

Yes

Do you broadly support the proposed strategy AC1?

Please share your comments on the proposed strategy AC1. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Yes. Electricity is an essential service, and should be available to all regardless of credit history.

We believe the EA should set a goal to end disconnections by 2027 and commission a report that compares the options for achieving this goal (to be published no later than April 2024). In the interim, they should ban fees for disconnections and reconnections in cases of unpaid bills.

It seems there are multiple possible mechanisms to ensure all consumers can attain power despite poor credit history. Options include:

- The government bulk-buying electricity, and making this available to customers that meet certain criteria (eg. people with Community Services Cards) at a concession rate. The Government could also make that concession rate available to social retailers.

- Requiring all retailers to take on a certain number of customers in hardship and absorb the associated costs.

- Requiring the last retailer connected to an ICP to remain connected even if the customer does not pay, and either absorbing the costs, or having government (eg. MSD) support with costs.

The EA should commission thorough, independent research to compare these options and others, to be published no later than April 2024. This research should also consider who should bear the costs of providing electricity to customers with poor credit history - the Government, retailers, or both.

Q47

Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Q48

Yes

Respondent skipped this question

Do you broadly support the proposed strategy AC2?

Q49

Please share your comments on the proposed strategy AC2. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Electricity is an essential service. No one should face disconnection for non-payment.

We want to see the EA make the Consumer Care Guidelines mandatory, monitor non-compliance and impose penalties for noncompliance. To make this effective, the EA needs sufficient funding for monitoring, and penalties need to be high enough to act as a deterrent.

We also want to see the EA make an explicit goal of zero disconnections for non-payment by 2027, and in the interim, to ban fees for disconnection or reconnection in cases of unpaid bills.

Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Q51

Yes

Respondent skipped this question

Do you broadly support the proposed strategy AC3?

Q52

Please share your comments on the proposed strategy AC3. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Lack of a smart-meter adds a significant financial penalty to customers when it comes to disconnection/reconnection fees. These are often more than \$100 greater for customers whose meters cannot handle remote disconnection/reconnection.

Smart meters should be rolled out as quickly as possible, prioritising lowest-income areas.

Q53 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q54 Do you broadly support the proposed strategy AC4?	Yes
Q55 Please share your comments on the proposed strategy AC4. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.	Respondent skipped this question
Q56 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q57 Do you broadly support the proposed strategy AC5?	Somewhat

Q58

Please share your comments on the proposed strategy AC5. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

See also our answer to AC1.

Electricity is an essential service. We agree with the Panel that "Adverse credit should not be a barrier to accessing energy. Instead, it should trigger a "high-care model", where retailers offer those customers increased support."

We also agree with David Close (quoted in the report): "No company is obliged to retail electricity, but any company that chooses to do so should accept that it entails the cost of servicing the people in our society who struggle."

We would like to see ALL retailers responsibly caring for customers who face times of hardship. This should be a standard, expected part of doing business. The development of intentional 'social retailers' is beneficial but it should not exempt other retailers from this responsibility.

We want to see the Electricity Authority make a goal to end disconnections for non-payment by 2027, and to commission research comparing options for achieving this goal, with the research to be published no later than April 2024.

This research should consider:

-Pros and cons of various mechanisms to supply post-pay electricity to all customers, regardless of credit history, so that no customer is ever disconnected.

-Who should bear the costs associated when customers cannot afford to pay (retailers absorbing these costs, or the Government/MSD, in what proportion).

In the interim, the EA should ban fees for disconnections and reconnections in cases of unpaid bills.

Q59

Please share your comments on each of the social retailing options listed above. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with these options.

The Government should mandate that generators provide a social hedge price to enable more dedicated social retailers to thrive.

The Government should separate generators and retailers. A simple step towards that would be to mandate that generator-retailers publish the price at which they sell electricity to their own retailer. That would boost social retailers' negotiating power.

Even as the social retailers sector grows, ALL retailers should retain responsibility for supporting customers in energy hardship. To what degree it is useful to have specialised players providing wrap-around services, versus all retailers doing this as part of doing business, should be explored in research.

Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

We want to see the Electricity Authority make a goal to end disconnections for non-payment by 2027, and to commission research comparing options for achieving this goal (ie, options for providing electricity to all, regardless of credit history), with the research to be published no later than April 2024.

Yes

In the interim, the EA should ban fees for disconnections and reconnections in cases of unpaid bills.

Q0Τ

Do you broadly support the proposed strategy AC6?

Q62

Please share your comments on the proposed strategy AC6. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Q63

Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Consider bulk-buying solar panels for social housing, to lower power bills for tenants.

Q64	Respondent skipped this question
Are there any other key challenges and/or corresponding solutions relating to ENERGY ACCESSIBILITY AND CHOICE KETE that we have missed? If so, please outline these below.	
Page 11: ENERGY AFFORDABILITY KETE	
Q65	Yes
Do you broadly support the proposed strategy AF1?	

Q66

Please share your comments on the proposed strategy AF1. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Respondent skipped this question

Respondent skipped this question

Yes

Do you broadly support the proposed strategy AF2?

Q68

Please share your comments on the proposed strategy AF2. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Yes - but this must come hand in hand with regulating to require that retailers bring down prices, otherwise the Government is just stepping in to pay unjust fees and unfair prices, which is not good use of taxpayer money.

Tens of thousands of households are going into debt due to electricity bills. In 2022, Work and Income gave out 36,948 Advance Payment of Benefit (ADV) and Recoverable Assistance Payment (RAP) grants for 'electricity', totalling \$16,631,423. (MSD provided this information to our group in OIA/09/23-3112. According to their response to our information request, it was unclear whether WINZ makes any non-recoverable grants for electricity costs.) This is significant debt adding stress to households.

We agree that the Government should provide greater financial assistance to households in energy hardship. HOWEVER, the Government should also regulate to require retailers to lower prices, by:

***Banning disconnection and reconnection fees in cases of unpaid bills.

***Requiring that retailers set pre-pay rates no higher than their cheapest post-pay rate, and to publish data on the price paid by prepay customers (including all fees) per Kwh of electricity consumed, so that it is possible to compare prices for post-pay and pre-pay (which has more fees, eg. for topping up).

***Empowering customers to switch more easily, by (1) requiring retailers to include more information on bills; (2) requiring retailers to give each pricing plan a unique code and inputting this into Registry next to ICPs; and (3) allowing price-comparison websites to request usage data directly from MEPs. (These changes would enable reputable price-comparison sites to access each ICP's pricing plan, and customers' usage data, to make more accurate comparisons, thus promoting switching and bringing prices down for everyone.)

***Ultimately working towards zero disconnections, and commissioning research to compare methods for ensuring that everyone can be connected (and on post-pay if they wish) regardless of their credit history, and different options for how the costs for this could be split between retailers and the government. The question of how much financial assistance should fall to government, versus absorbed by profitable retailers, should be part of the conversation about how to ensure electricity supply for all.

Q69

Yes

Do you broadly support the proposed strategy AF3?

Please share your comments on the proposed strategy AF3. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Christian Action Aotearoa has particular concerns about:

(1) disconnection/reconnection fees in cases of unpaid bills, and

(2) fees charged to pre-pay customers.

We will discuss each in turn.

*** (1) Fees for disconnection and reconnection in cases of non-payment ***

We are concerned that in cases of disconnection due to unpaid bills, charging fees for disconnection and (later) for reconnection is inherently unreasonable.

These fees by definition target people already unable to pay, who are vulnerable, and 'kick them when they are down'. We believe the Electricity Authority should ban these fees. We believe that such a ban would also have the effect of incentivising retailers not to disconnect people, because the retailer would have to absorb the costs.

We have looked at 16 retailers' websites and compared their disconnection and reconnection fees in a spreadsheet. We also emailed each company to request further clarifications, and asked them to break down these fees into their components.

Through this process we found out:

***That in cases of unpaid bills fees, disconnection and reconnection fees range considerably. As far as we can tell, for remote disconnections/reconnections, fees range from:

- \$25 (Meridian, \$0 for disconnection, \$25 for reconnection)
- \$29 (Genesis disconnection fee, includes reconnection)
- \$50 (Flick \$25 disconnection fee, \$25 for reconnection)
- \$70 (Mercury may include reconnection, that is unclear)
- \$90 (Trustpower \$45 for disconnection, \$45 for reconnection)
- \$180 (Powershop \$90 for disconnection due to missed payment, \$90 for reconnection)

*** Some companies have 'free' reconnections, other companies charge an additional fee.

***Not having a smart-meter adds a significant financial penalty, especially after hours. Manual disconnections range from:

- \$125 (Meridian, charges reconnection fee only)
- \$192 (Genesis, includes reconnection)
- \$220 (Contact, after hours, unclear whether reconnection included)

- \$276 (Ecotricity, manual disconnection of \$120 + reconnection of \$120 + GST).

This creates a strong case for rapidly rolling out smart-meters in low-income areas.

*** Transparency about what these fees cover is very poor.

With a few exceptions, we could not understand retailers' websites about what disconnection and reconnection fees referred to. We had to email to ask for clarifications as to which fees would apply in different scenarios.

Of the 16 companies we emailed requesting clarifications, only 5 replied to us after two weeks. Of those companies that replied:

- All said their fees reflected their costs from the metering company, or "fees reflect labour costs (either our staff or contractors) as well as any transport, equipment and network or metering provider costs." We considered this vague, and it did not answer our question as to why fees varied so much.

- No companies broke down their fees into dollar amounts for these components.

We are confused why fees should vary so much if reflecting actual costs. We are concerned by the lack of transparency and the companies' unwillingness to break these fees down for us. In our view, unless retailers break down their fees into component parts, simply listing 'labour costs, transport, equipment, and MEP costs' could entitle them to charge ANY fee, without the customer being able to challenge it as reasonable or otherwise. One company told us they do not make profit from these fees, however they provided no evidence. Other companies did not even reply to our questions about their fees.

We note that companies waive (ie. absorb) disconnection / reconnection fees in many other situations, such as new customers joining; existing customers moving house; and (according to several social workers) when a social worker is standing up for a customer in hardship. To their credit, Contact told us they are currently waiving disconnection fees for prepay customers. (Previously they charged \$10 per disconnection.) These situations show us it is possible for companies to waive fees.

We would like to see the EA:

-Ban disconnection and reconnection fees in cases of unpaid bills -Set a goal of zero disconnections for non-payment, by 2027.

***(2) Pre-pay fees ***

We are concerned that when fees are included, pre-pay customers pay higher rates for electricity than post-pay customers do.

We would like to see the EA:

- *** Require retailers to ensure that pre-pay prices are no higher than their cheapest post-pay plan, and to publish:
- real-time data on pre-pay disconnections, and
- quarterly data on the median price paid by pre-pay customers including all fees per kwh of electricity they use.

The publication of this data would enable transparency about what actual prices pre-pay customers are paying, compared to post pay.

Q71

Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Q72

Yes

Respondent skipped this question

Do you broadly support the proposed strategy AF4?

Q73

Please share your comments on the proposed strategy AF4. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Yes, we are concerned that pre-pay customers pay higher rates once fees are taken into account.

We want to see the EA require retailers to ensure that pre-pay prices are no higher than their cheapest post-pay plan, and to publish: *** real-time data on pre-pay disconnections. Specifically, this should include data on frequency – total number of disconnections, and the mean, median and range number of disconnections per household; and data on duration – mean, median and range of duration, and total number of incidences 12 hours or more, and number of households experiencing disconnection of 12hrs or more duration. *** quarterly data on the median price paid by pre-pay customers - including all fees - per kwh of electricity they use.

Q74 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q75 Do you broadly support the proposed strategy AF5?	Yes
Q76 Please share your comments on the proposed strategy AF5. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.	Respondent skipped this question
Q77 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q78 Do you broadly support the proposed strategy AF6?	Yes
Q79 Please share your comments on the proposed strategy AF6. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.	Respondent skipped this question
Q80 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q81 Are there any other key challenges and/or corresponding solutions relating to the ENERGY AFFORDABILITY KETE that we have missed? If so, please outline these below.	Respondent skipped this question

Page 12: CONSUMER PROTECTION KETE

Q82

Yes

Do you broadly support the proposed strategy CP1?

Q83

Please share your comments on the proposed strategy CP1. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Yes. The Electricity Authority should make all the Consumer Care Guidelines mandatory, monitor non-compliance and impose penalties for non-compliance.

To make this effective, they should set aside sufficient funding for stringent monitoring, and ensure that penalties are high enough to create a deterrent effect.

Q84

Yes

Do you broadly support the proposed strategy CP2?

Q85

Please share your comments on the proposed strategy CP2. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Yes. The Electricity Authority should make all the Consumer Care Guidelines mandatory, monitor non-compliance and impose penalties for non-compliance.

To make this effective, they should set aside sufficient funding for stringent monitoring, and ensure that penalties are high enough to create a deterrent effect.

Q86

Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Q87

Yes

Respondent skipped this question

Do you broadly support the proposed strategy CP3?

Please share your comments on the proposed strategy CP3. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Retailers should be required to publish:

1) real-time data on pre-pay disconnections. Specifically, data on frequency – total number of disconnections, and mean, median and range number of disconnections per household; and data on duration – mean, median and range of duration, and total number of incidences 12 hours or more, and number of households experiencing disconnection of 12hrs or more duration.

2) quarterly data on the median price paid by pre-pay customers - including all fees - per kwh of electricity they use.

3) the number of letters sent threatening disconnection.

The Electricity Authority should actually publish this information quarterly. Currently, the last available disconnection statistics are from 2021.

Q89 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q90 Do you broadly support the proposed strategy CP4?	Yes
Q91 Please share your comments on the proposed strategy CP4. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.	Respondent skipped this question
Q92 Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	Respondent skipped this question
Q93 Are there any other key challenges and/or corresponding solutions relating to the CONSUMER PROTECTION KETE that we have missed? If so, please outline these below.	Respondent skipped this question

Page 13: Are there any other sections you would like to respond to?

Q94

No, I would like to continue onto the final questions

Please tick yes if you would like to go back and respond to any further sections

Page 14: Supporting Environment

Q95

Respondent skipped this question

Do you have any comments on the Supporting Environment section? Please share these below.

Page 15: Any other thoughts or comments

Q96

Do you have any other thoughts or comments you would like to make on the Expert Panel's Discussion Paper? If so, please share these below.

Happy to provide more information from our research on disconnection fees. Please get in touch, kate.v.day@gmail.com.