

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?

Dr Sea Rotmann

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 Please note this will not be published with your submission.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

Organisation

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

Page 4: Submitting on behalf of an organisation

Q6

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

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

Q7

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

SEA - Sustainable Energy Advice Ltd

Q8

Academic/Research

Which of these best describes your organisation? Please tick one.

Page 5: Confidentiality

Q9

No, my submission may be published in its entirety

I would like my submission or parts of my submission to be kept confidential

Page 6: Please upload a publishable version of your submission

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

Which sections would you like to provide feedback on?

**HEALTH OF THE HOME KETE,
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.

It's absolutely essential to bring our appalling housing stock up to code, and WKH has delivered this mahi relatively well. It does have to be more flexible though to address broader issues including repairs, weather tightness, mould, ventilation etc. to help the most impacted whānau. That also means going more strongly after landlords (I know this is addressed elsewhere but this can be a carrot if landlords of very vulnerable tenants get greater subsidies - as long as they get obliged to keep renting at the same rates to them for a certain period of time)

Q15

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

As I said, going after landlords, identifying the most vulnerable whānau and the worst housing - might mean partnering much more closely with community and frontline providers rather than doing it top-down via EECA.

Q16

Yes

Do you broadly support the proposed strategy HH2?

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.

This one is crucial and something we've been saying since the inception of WUNZ:HS that was missing in the insulation and clean heating subsidies. Often, there are a lot of repairs and weather tightness improvements needed before many Kiwi homes are even ready for insulation.

Q18

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

Again, partnering with frontline and community providers and local tradies and repairs people to help identify and scale up across all regions including rurally. More flexibility and less red tape to target the help where it's needed.

Q19

Yes

Do you broadly support the proposed strategy HH3?

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.

Super important, needs to have money and teeth behind it. We may need to start hearing about actual legal and serious financial consequences for slum landlords. What this doesn't address is the housing shortage and amount of fear a lot of vulnerable tenants have of their landlords. Again, I'd say partner with community orgs and local councils to tackle this problem from the ground up. Another issue I personally encountered is how lax the Healthy Housing Standard is. I sold my dilapidated, uninsulated, single-glazed, freezing and mouldy South Coast bach to the airport in 2020, and rented it for 2 years after. The first 12 months there was a moratorium as I was the previous owner. After that, they did not even do the minimum fixes (including a new window that was installed wrong, without flashing, and where water got into the bedroom when it rained), and yet I got a certificate that the house qualified under the Healthy Homes Standard! I cannot stress enough how unhealthy that house was - it was leaky, had black mould and was 8C indoors in winter until the (inadequate) heater was turned on, which we could fortunately afford. If that is how that standard is enforced, there is no way that underprivileged whānau will get help to live in the housing everyone deserves. We also have culturally an incredibly lax attitude to housing stock that the rest of the Western world would condemn as unliveable.

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.

Absolutely, they need to be supported and there needs to be more education around what their rights are. Again, partner with community and frontline orgs and advocates to get the info out. Show some teeth with landlords who are repeat offenders.

Q23

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

Also work with landlord and housing associations and promote those that do really well to have a carrot and stick approach. We used our SEEC-funded HEAT kits really successfully with Dwell Housing who we partnered with to identify really vulnerable social tenants. Win-win-win!

Q24

Yes

Do you broadly support the proposed strategy HH5?

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.

Yeah that's a no-brainer. Combine that with really strong standards and regulations to improve the energy efficiency all around. But poor whānau should not be penalised for not being able to afford the highest-quality whiteware up front

Q26

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

Get rid of inefficient choices, have return and trade-in programmes, recycling programmes, and more education around energy-efficient choices and how much certain old appliances cost compared to EE ones. Trade in your beer fridge campaign!

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.

Lack of affordable and healthy housing full stop. We don't have enough, even wealthy Kiwis live in appalling conditions (I did, until recently!). With increased immigration we'll have even more of a housing crunch and our poorest whānau suffer the most. Also, overcrowding isn't addressed here and it must. E.g. we must build larger homes for Pasifika whānau who are used to communal living. Co-housing, papakāinga and eco-communities should be supported, both financially and by removing red tape.

Page 9: KNOWLEDGE AND NAVIGATION KETE

Q28

Yes

Do you broadly support the proposed strategy KN1?

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.

Yes, that is SO important! So many silos exist within and between sectors, and making every community organisation scramble for a tiny piece of an inadequate pie isn't helpful. The government should financially support cross-sectoral networks and collaboration and stay engaged in them.

Q30

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

Should also support landlord associations like in Sweden, there is something to be said about positive peer pressure. Also keep up the Reference Group, that was an amazing group of cross-sector, cross-motu stakeholders and experts that should continue advising the government (no matter of what stripe) on long-term issues we collectively need to tackle including energy hardship, a just energy transition and decarbonising the system, and address structural and historical injustices.

Q31

Yes

Do you broadly support the proposed strategy KN2?

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.

100% and they need to be co-created and designed by Indigenous and Pasifika experts. Also need to target other marginalised groups such as mentally and physically disabled, isolated elderly, vulnerable students and rainbow youth, sex workers, homeless, addicts, whānau associated with gangs etc. They all have a basic human right to access affordable, sustainable energy and a healthy home.

Q33

Yes

Do you broadly support the proposed strategy KN3?

Q34

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.

Yes! And make the funding more flexible to ensure red tape doesn't stop certain frontline providers who don't see themselves as energy (education) experts. Also need to up the total amount for groups that want to do collaborative bids to ensure scale-up across the motu and with different successful (e.g. past successful SEEC programmes) strategies that complement one another.

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

Yes

Do you broadly support the proposed strategy KN4?

Q37

Please share your comments on the proposed strategy KN4. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Hugely important - a big thing is the targeted and co-designed training component from KN2 for frontline navigators. But we need to improve energy literacy across the motu and that should include schools and ECEs, trades and other middle actors like whiteware and car salespeople, real estate agents, church leaders etc.

Q38

Somewhat

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.

Yes, and an online portal isn't enough. Plus, getting that information to be accurate according to different contexts requires more resource-intensive efforts such as face-to-face advice and home visits. Nothing beats those to get a real understanding of what whānau's barriers and needs are. The HEAT kits we upgraded under SEEC funding had 100% successful uptake of very vulnerable whānau undertaking 2 weeks of daily activities measuring their home and energy performance. That is a good way of doing some bottom-up education rather than just providing information. Lack of information is often not the problem - lack of understanding and empathy is.

Q40

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

Support kanohi ki te kanohi provision of information and targeted in-home support by trusted navigators instead of more expensive top-down information provision (EECA has done that for years and our energy literacy rates are still dismal). Also: never promise % or \$ savings without really understanding the lived experience, they are often meaningless and can actually make things worse.

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.

I've done so much qualitative research here and in North America, with households and small businesses, and very few understand complex rate and plan offerings and tariffs, nor what their bill actually means. Should also be part of widespread energy literacy training, but the regulators should get involved as well to ensure pricing structures and billing is adequate and equitable.

Q43

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

More energy literacy across the motu! Any changes in rates or tariffs should come with dedicated education paid for by the utilities.

Q44

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

More funding in research please - it has been a decade since we got Energy Cultures funded, and that was pretty much the only demand-side and behavioural science funding programme. One of the huge aspects missing in the "8 things that cause energy hardship" is psychographic insights into behaviours, cultures, household politics, values, attitudes, and the psychology around stigma, whakamā, judgement, status etc. I would desperately like to see some proper funding behind understanding that aspect of energy hardship better!

Page 10: ENERGY ACCESSIBILITY AND CHOICE KETE

Q45

Yes

Do you broadly support the proposed strategy AC1?

Q46

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.

Totally. Whānau shouldn't depend on social retailers.

Q47

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

Enshrine the basic universal right to access clean and affordable energy constitutionally.

Q48

Yes

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.

Agree. A lot of the big gentailers are already trying to do better, but they do have issues reaching vulnerable customers. More connection with community and frontline providers is needed to break down the fear / trust barrier.

Q50

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

See my point on enshrining universal basic access to power (like a universal basic income)

Q51

Yes

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.

Good one, not always easy, may also need to combat some misinformation e.g. around privacy concerns and various conspiracies around smart meters

Q53

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

There's a huge amount of smart home technology and associated rates changes happening overseas (especially in the US), some of it could be really useful to transfer to the Kiwi context, others need to be researched with an energy equity lens to ensure no unintended consequences for most vulnerable whānau

Q54

Yes

Do you broadly support the proposed strategy AC4?

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.

YES!!!

Q56

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

Also improve peer-to-peer neighbourhood sharing and small-scale renewables to be much easier consented (aka avoid the Blueskin Bay debacle)! Subsidise rooftop solar and green community buildings for rural communities.

Q57

Somewhat

Do you broadly support the proposed strategy AC5?

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.

I'm generally very supportive of social retailers but hate that they are necessary when the majority of our energy infrastructure is Crown-owned! If the government took a less neoliberal shareholder view to its assets and instead saw them as a public good, this shouldn't fall to community-owned social retailers. Maybe as an interim solution, yes, but I'd rather see work to enshrine energy access as a universal public good and human right.

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.

- a) No - because there will never be one that understands all contexts (e.g. geographic or cultural)
 - b) Better option, although we know there are always big differences between regions (see TAs, or water infrastructure), which is why
 - c) is maybe best, but then there is danger that remote regions with smaller populations get overlooked again for the big areas of focus like South Auckland
-

Q60

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

See above

Q61

Yes

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.

This is one of the most important issues, as it will have such major long-term implications.

Q63

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

Do some research into what unintended consequences have already happened in the past and elsewhere from designing the energy transition from a white, Eurocentric, middle-class and male (engineering and economics-driven) perspective. Learn from those mistakes. Don't make major changes without ensuring you understand the lived experiences on the ground. Work on bottom-up and middle-out solutions with communities and frontline providers. Seek independent expert input.

Q64

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.

The global energy crisis is real and staggering in its impact. We are somewhat but not completely isolated and the trilemma of how to balance decarbonising the energy system, managing community and infrastructure resilience and adapting to a collapsing climate, and ensuring energy justice when the whole system is built on structural injustice, is hitting us just as hard here. A lot more collaboration, co-design and willingness to tackle big issues like decolonisation and mana motuhake are essential.

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.

No Kiwi should have to choose between heating and eating or heating and paying their rent. Ever.

Q67

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.

Agree with all of these

Q69

Yes

Do you broadly support the proposed strategy AF3?

Q70

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.

Very strongly agree, and there should be real consequences for price gouging or non-empathetic retailers

Q71

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

More teeth against misperforming retailers, progressive pricing. Big issue is retailers not knowing how many people live in households. Causes big inequity (see removal of low user charges) and health issues from structural and functional overcrowding.

Q72

Yes

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.

Very much agree - also needs to be underpinned with qualitative on the ground research to understand the motives and needs behind how vulnerable whānau use prepay better

Q74

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

Universal basic income and universal basic energy allowance

Q75

Yes

Do you broadly support the proposed strategy AF5?

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.

Whatever flexibility whānau need. Also keep supporting and scaling up EnergyMate across the motu

Q77

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

More energy education undertaken by the retailers, particularly targeting their vulnerable customers. They need to be seen in the community more (see our Mercury and Genesis Energy research into hidden hardship)

Q78

Yes

Do you broadly support the proposed strategy AF6?

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.

Should be progressive as well

Q80

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

Set up multi-sectoral working group including retailers, network companies, regulators, researchers and community experts. Don't make them figure it out in isolation due to ComCom restrictions - on big issues like energy hardship and a just energy transition, the industry should be able to collaborate.

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.

Privacy and ComCom issues can sometimes cause unintended hardship too

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.

should be mandatory already

Q84

Yes

Do you broadly support the proposed strategy CP2?

Q85

Respondent skipped this question

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.

Q86

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

Public shaming works wonders too - especially when they are Crown-owned and have windfall shareholder profits quarter after quarter!

Q87

Yes

Do you broadly support the proposed strategy CP3?

Q88

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.

especially in aggregate, this data is invaluable to understand the extent of the problem

Q89

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

Provide access to IDI for researchers and data analysts in the industry

Q90

Yes

Do you broadly support the proposed strategy CP4?

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.

makes sense

Q92

Respondent skipped this question

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

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.

We should look at the energy system through the consumer and energy justice lens, instead of a shareholder profit lens. It's a public good. Consumers should all have right to equal access, protection and customer care.

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

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

- Data and insights need to be improved with qualitative research and insights from the ground. Don't ignore human psychology, behaviour, culture and household politics
 - Agree that EWEC needs to be formalised and receive funding
 - yes to better government attention and collaboration among key agencies, but they also need to stop operating in top-down silos. Keeping the Reference Group going as an advisory panel would be one way to ensuring leadership isn't biased or has too many blind spots
 - YES to participatory approach and ensuring all marginalised voices are heard
 - Yes to collaborative service models, especially if it ensures more resourcing and less red tape for those supporting whānau on the ground
 - YES to a durable funding environment that isn't dependent on 3-year political cycles! Get multi-partisan cross-party agreement that this is a long-term issue that needs long-term support and solutions. Take the politics and hierarchies out as much as possible. See e.g. Scandinavian collaborative governance approaches
-

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.

I thoroughly enjoyed being on the Reference Group and think the process MBIE's Energy Hardship team and expert panel have led was marvellous. I just hope that these recommendations will be taken up, strengthened and supported across political parties and all sectors. He waka eke noa!
