

Submission Form

The Energy Hardship Expert Panel welcomes your feedback on its Discussion Paper 'Te Kore, Te Pō, Te Ao Marama | Energy Hardship – the challenges and a way forward.'

We welcome your feedback

This is the Submission Form for responding to the Discussion Paper released by the Energy Hardship Expert Panel '[Te Kore, Te Pō, Te Ao Marama | Energy Hardship – the challenges and a way forward.](#)' The Expert Panel welcomes your comments by **5pm on Friday 28 April 2023.**

Please make your submission as follows:

1. Please see the full Discussion Paper [here](#) to help you have your say.
2. Please read the privacy statement and fill out your details under the 'Submission information' section.
3. Please fill out your responses to the questions in the tables provided. Your submission may respond to any or all of the questions. Questions which we require you to answer are indicated with an asterisk (*). Where possible, please include evidence to support your views, for example references to independent research, facts and figures, or relevant examples.
4. Before sending your submission:
 - a. delete this first page of instructions; and
 - b. if your submission contains any confidential information, please:
 - State this in the cover page or in the e-mail accompanying your submission and respond to questions 8,9 and 10 below explaining which parts should be withheld and why.
 - Indicate this on the front of your submission (e.g., the first page header may state "In Confidence"). Any confidential information should be clearly marked within the text of your submission.
 - Provide an alternative version of your submission with confidential information removed in both Word and as a PDF for publication by MBIE.
5. Submit your submission by:
 - a. emailing this form as both a Microsoft Word and PDF document to the MBIE secretariat at energyhardshipMBIE@mbie.govt.nz; or
 - b. posting your submission to:
Energy Hardship Expert Panel
c/- Energy Use team
Ministry of Business, Innovation and Employment
15 Stout Street
PO Box 1473
Wellington 6140

Please direct any questions that you have in relation to the submissions process to energyhardshipMBIE@mbie.govt.nz.

Privacy statement

The information provided in your submission will be used to inform the Panel's final recommendations to government on energy hardship and related policy development, and will inform government agencies' advice to Ministers. Your submission will also become official information, which means it may be requested under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available upon request unless there are sufficient grounds for withholding it.

Use and release of information

To support transparency in our decision-making, MBIE, as the secretariat for the Energy Hardship Expert Panel, proactively releases a wide range of information. MBIE will upload copies of all submissions to its website at www.mbie.govt.nz. Your name, and/or that of your organisation, will be published with your submission on the MBIE website unless you clearly specify you would like your submission to be published anonymously. Please tick the box provided if you would like your submission to be published anonymously i.e. without your name attached to it.

If you consider that we should not publish any part of your submission, please indicate which part should not be published, explain why you consider we should not publish that part, and provide a version of your submission that we can publish (if we agree not to publish your full submission). If you indicate that part of your submission should not be published, we will discuss with you before deciding whether to not publish that part of your submission.

We encourage you not to provide personally identifiable or sensitive information about yourself or others except if you feel it is required for the purposes of this consultation.

Personal information

All information you provide will be visible to Energy Hardship Expert Panel members and to the MBIE officials who are analysing the submissions and/or working on related policy matters, in line with the Privacy Act 2020. The Privacy Act 2020 includes principles that guide how personal information can be collected, used, stored and disclosed by agencies in New Zealand.

Contacting you about your submission

The Energy Hardship Expert Panel or MBIE officials may use the information you provide to contact you regarding your submission. By making a submission, MBIE will consider you to have consented to being contacted, unless you clearly specify otherwise in your submission.

Viewing or correcting your information

This information will be securely held by MBIE. Generally, MBIE keep public submission information for ten years. After that, it will be destroyed in line with MBIE's records retention and disposal policy. You have the right to ask for a copy of any personal information you provided in this submission, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact the MBIE secretariat by emailing energyhardshipMBIE@mbie.govt.nz

Submission information

(Please note we require responses to all questions marked with an *)

Personal details and privacy	
Q1.	I have read and understand the Privacy Statement above. Please tick Yes if you wish to continue* [To check the boxes above: Double click on box, then select 'checked'] <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Q2.	What is your name?* Michael Fitzgerald
Q3.	Do you consent to your name being published with your submission?* <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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?* <input type="checkbox"/> Individual (skip to Q8) <input checked="" type="checkbox"/> Organisation
Q6.	If on behalf of an organisation, we require confirmation you are authorised to make a submission on behalf of this organisation. <input checked="" type="checkbox"/> Yes, I am authorised to make a submission on behalf of my organisation
Q7.	If you are submitting on behalf of an organisation, what is your organisation's name? Please note this will be published with your submission. Empower Energy Charitable Trust
Q8.	If you are submitting on behalf of an organisation, which of these best describes your organisation? Please tick one. <input type="checkbox"/> Iwi, hapū or Māori organisation <input type="checkbox"/> Energy retailer <input type="checkbox"/> Energy regulator <input type="checkbox"/> Energy distributor <input checked="" type="checkbox"/> Registered charity

Non-governmental organisation

Local Government

Central Government

Academic/Research

Other. Please describe:

Q9. I would like my submission or parts of my submission to be kept confidential.*

Yes

No

Q10. If you answered yes to Q9 above, please provide your reasons and grounds under [section 9 of the Official Information Act](#) that you believe apply, for consideration by MBIE.

Q11. If you answered yes to Q9 above, please confirm you will provide publishable versions of your submission in both Word and in PDF by emailing them to the MBIE secretariat at energyhardshipMBIE@mbie.govt.nz - clearly labelling both "for publication"

Yes

No

Responses to questions

The Energy Hardship Expert Panel welcomes your feedback on as many sections as you wish to respond to, please note you do not need to answer every question.

Q12. Please tick those sections which you wish to provide feedback on:

- HEALTH OF THE HOME KETE
- KNOWLEDGE NAVIGATION KETE
- ENERGY ACCESSIBILITY AND CHOICE KETE
- ENERGY AFFORDABILITY KETE
- CONSUMER PROTECTION KETE

HEALTH OF THE HOME KETE

Improving individual, house and whānau energy wellbeing through healthier homes

Challenge: A significant number of New Zealand homes require retrofit to bring them to a healthy standard of energy performance

Strategy HH1: Strengthen and expand Warmer Kiwi Homes (WKH) programme (measures, reach and funding) so more low-income New Zealanders are supported into energy wellbeing

Q13. Do you broadly support the proposed strategy HH1?

- Yes
- Somewhat
- No
- Don't know/Not sure

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.

Empower Energy Charitable Trust endorses HH1 but without eligibility criteria, but rather a triage of a universal process.

Q15. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

In order to have full adoption and the least resistance make HH1 universal with an open criteria and a triage of service to break any resistance

Challenge: The full benefits of energy efficiency improvements cannot be accessed unless a home is weathertight and reasonable quality

Strategy HH2: Fund broader building repair and improvement work to support home retrofit programmes

Q16. Do you broadly support the proposed strategy HH2?

- Yes
- Somewhat
- No
- Don't know/Not sure

Q17. Please share your comments on the proposed strategy HH2. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.

There are community agencies facilitating important housing repair work for people in hardship. These agencies require much more support, financial and training to address the true extent of the issues.

Q18. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Have interest free loans with long payback terms available for all home improvements with free advice services, as well as some universal repairs covered for free, when facilitated by accredited agencies.

Challenge: Tenants are four to five times more likely to experience energy hardship than owner-occupiers

Strategy HH3: Strengthen the monitoring, compliance and enforcement of the Healthy Homes Standards

Q19. Do you broadly support the proposed strategy HH3?

- Yes
- Somewhat
- No
- Don't know/Not sure

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.

Make tenancy not subject to change of ownership.
Protect the vulnerable tenants, and don't expose them to eviction by making the landlords blame the tenants for speaking up about non-compliance. The landlords will need to be brought into the conversation, and helped with bringing the home up to compliance.

Challenge: Tenants are four to five times more likely to experience energy hardship than owner-occupiers

Strategy HH4: Strengthen advocacy and support services for tenants

Q21. Do you broadly support the proposed strategy HH4?

- Yes
- Somewhat
- No
- Don't know/Not sure

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.

Tenants are very exposed to the housing shortage, and will put up with substandard housing rather than being without a home.

Q23. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Rental WOF requirements

Challenge: Energy efficient household appliances (e.g. whiteware, lighting, cooking) offer important long-run cost savings but the higher purchase price often puts them out of reach

Strategy HH5: Expand all energy-related MSD purchase assistance programmes for household appliances to offer energy efficient choices

Q24. Do you broadly support the proposed strategy HH5?

- Yes
- Somewhat

No

Don't know/Not sure

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.

Long term interest free loans for energy efficient appliances that go beyond the basic appliance should be a financially viable option.

Q26. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

FINAL QUESTION FOR HEALTH OF THE HOME:

Q27. Are there any other key challenges and/or corresponding solutions relating to the HEALTH OF THE HOME KETE that we have missed? If so, please outline these below.

The use of grants for energy efficient appliances, to bring everyone onboard.

KNOWLEDGE AND NAVIGATION KETE

Supporting and empowering whānau energy decisions

Challenge: Stronger coordination and collaboration across providers of energy hardship programmes and support services is needed to improve effectiveness and coverage

Strategy KN1: Establish and fund a nation-wide "energy wellbeing sector network" to facilitate and support enhanced service integration and collaboration between local organisations and establish co-networks for Māori and Pacific practitioners

Q28. Do you broadly support the proposed strategy KN1?

Yes

Somewhat

No

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 or limitations associated with this strategy.

Regional providers will have the best relationships with their clients, so should not have to conform to centralised ideals which may not be suitable for their communities. It is important that these hard working providers can access central assistance for training,

funding, administrative resources, and other resources that could be streamlined and provide coordinating guidance.

Q30. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

The Empower Energy Charitable Trust platform is building a wide community or network of providers (Care Agencies) right across Aotearoa to distribute the energy bill credits to those facing energy hardship. The network being built through this platform could be leveraged by MBIE and other government departments to channel ideas and discussion in both directions.

Challenge: There is a lack of widespread, easy access to trusted and informed community-based energy advisers, home assessors and service navigators

Strategy KN2: Strengthen and deliver energy wellbeing 'navigator' training (such as Home Performance Advisor), including Māori and Pacific energy wellbeing training wananga/programmes that are grounded in Te Ao Māori and Pacific worldviews

Q31. Do you broadly support the proposed strategy KN2?

- Yes
- Somewhat
- No
- Don't know/Not sure

Q32. Please share your comments on the proposed strategy KN2. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.

These navigators are providing an important service to our most vulnerable, and there is not enough of them to meet the current need. Please strengthen the efforts to train more navigators in all important energy wellbeing areas, including home condition, energy education, financial literacy, and others that that sector are asking for.

Challenge: There is a lack of widespread, easy access to trusted and informed community-based energy advisers, home assessors and service navigators

Strategy KN3: Strengthen and extend MBIE's Support for Energy Education in Communities (SEEC) programme, and ensure funding targeting and programme design recognise those groups over-represented in energy hardship such as Māori, Pacific peoples and tenants

Q33. Do you broadly support the proposed strategy KN3?

- Yes
- Somewhat
- No

Don't know/Not sure

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, as per KN2 response, strengthening MBIE's support, through what ever means is important. SEEC is an ideal fund to provide education that these navigators provide – but be sure to include a wide range of training certifications to promote the entire energy wellbeing landscape.

Q35. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Challenge: Increased support is needed to boost energy literacy among tenants, landlords and homeowners

Strategy KN4: Develop and deliver an Energy Wellbeing Education Strategy for targeted education on energy-saving practices, consumer protection rights, and how to access authoritative information (including targeting for specific groups over-represented in energy hardship)

Q36. Do you broadly support the proposed strategy KN4?

Yes

Somewhat

No

Don't know/Not sure

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.

The landlord situation is particularly challenging, especially private landlords. Tenants have a legitimate fear of eviction if they make too much noise – and because of the immense housing shortage there will be no problem for the landlord to evict a family and replace them with another less 'complaining' one.

Having a mechanism for landlords to get energy efficient technology installed in the homes that is heavily subsidised, if not free, would be a way to improve the homes without adversely affecting the tenants security of housing.

Challenge: Increased support is needed to boost energy literacy among tenants, landlords and homeowners

Strategy KN5: Develop and maintain a comprehensive online portal as a "go-to" for accurate, up-to-date and complete information for tenants, landlords and homeowners to support improved energy wellbeing, good energy choices, efficient energy use in the home and consumer protection rights

Q38. Do you broadly support the proposed strategy KN5?

- Yes
- Somewhat
- No
- Don't know/Not sure

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.

This physical, not online, idea used to be implemented apparently by the old 'powerboards' which were lines companies and energy retailers all-in-one before the debundling. The powerboard had a vested interest in keeping energy use low and efficient to save on expensive infrastructure spend, and had physical showrooms to educate consumers about how electrical appliances worked and how to use them efficiently.

This job probably falls under the EECA remit now, and an online portal should be maintained by EECA. To do a similar physical effort of the 'old days' would require a vast regional outreach, but possibly contracting out to existing community organisations who have the spaces and staff available to provide this education in person would work. Some people do not engage with online education, sometimes people want to touch and do things rather than read or watch videos online.

Q40. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Static sites and a mobile example (truck mounted tiny home style)

Challenge: Households can face challenges in accessing and understanding bill and pricing information and options

Strategy KN6: Simplify energy bills and information access, improve comparability across electricity tariff structures, and improve price comparison services

Q41. Do you broadly support the proposed strategy KN6?

- Yes
- Somewhat
- No
- Don't know/Not sure

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.

Energy retailers are competing for customers, so currently have the ability to disguise charges like metering and lines(local and transpower) charges with confusing deals.

Q43. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Any charges should be clear and not hidden/bundled so that comparability is possible.

FINAL QUESTION FOR KNOWLEDGE AND NAVIGATION KETE:

Q44. Are there any other key challenges and/or corresponding solutions relating to the KNOWLEDGE AND NAVIGATION KETE that we have missed? If so, please outline these below.

ENERGY ACCESSIBILITY AND CHOICE KETE

Improving individual, house and whānau energy wellbeing through healthier homes

Challenge: Credit issues can prevent individuals, households and whānau from having choice in an electricity supplier or switching suppliers

Strategy AC1: Develop mechanism(s) to ensure all residential consumers can obtain a post-pay electricity supply despite "adverse credit"

Q45. Do you broadly support the proposed strategy AC1?

Yes

Somewhat

No

Don't know/Not sure

Q46. Please share your comments on the proposed strategy AC1. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.

Take Energy as a basic human right. Our current rules were written when homes had coal ranges and wet backs and firewood could be free. This is not the case now for the vast population and so our framing of energy access needs to be redesigned.

Q47. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Challenge: Households struggling to pay their bills face disconnection

Strategy AC2: Develop mandatory rules for electricity retailers to follow before disconnecting for non-payment so that disconnection becomes the last resort, including penalties e.g. for wrongful disconnection

Q48. Do you broadly support the proposed strategy AC2?

- Yes
- Somewhat
- No
- Don't know/Not sure

Q49. Please share your comments on the proposed strategy AC2. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.

Disconnection is already apparently a last resort option, and often the only way for a customer to engage with the retailer, but yes, more consistent rules that all retailers have to follow would be a good step.

Q50. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

If retailers are considering disconnecting a customer, having the Empower Energy platform available for the retailer to refer the customer to a trusted local Care Agency might be a good preventative step to get engagement and some payment made to the account so that disconnections could be avoided.

Disconnections should be a process similar to eviction and over a similar time frame with reference and involvement of caring agencies.

Challenge: Metering technology may constrain a household's access to energy supply and tariff choice

Strategy AC3: Identify and address the barriers to completing smart meter roll-out, prioritising areas of low coverage, and requests from households in energy hardship

Q51. Do you broadly support the proposed strategy AC3?

- Yes
- Somewhat
- No
- Don't know/Not sure

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.

The metering cost needs to be very clear, and if it is more expensive to install or use the metering in certain areas, then there needs to be some thought about who pays for this. It is not fair for the energy user to have to pay a significantly higher fee for their meter due to meter communication coverage or other such constraints.

Q53. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Challenge: Rural and off-grid households or communities, and those living on communal or ancestral land, need additional support to build their energy access, resilience and sovereignty

Strategy AC4: Provide increased funding and support for community energy schemes and capability-building in rural communities to ensure rural and off-grid households and those on communal or ancestral lands (including Papakāinga) in energy hardship can access secure energy supply, linking with other energy programmes such as WKH and SEEC

Q54. Do you broadly support the proposed strategy AC4?

Yes

Somewhat

No

Don't know/Not sure

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.

Empower Energy's platform can provide the mechanism for community energy projects to share their surplus across different energy retailers by having the third party platform receive the credits and have the ability to direct the credits to participants in the community energy project. This can happen without any regulatory changes because it is a pragmatic platform that works with the billing systems to transfer credits earned in one or more retailers, directs that credit to the independent, charitable trust fund (which makes the gifting of credit a charitable donation, eligible for a tax credit), and can be re allocated to power accounts of any retailer from that central point.

Q56. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Facilitate the growth in energy sovereignty. This may change from place to place.

Challenge: Individuals, households and whānau in energy hardship often have limited options in choosing, and engaging with, an energy retailer

Strategy AC5: Explore ways to facilitate and support social retailing which can provide post-pay supply to those in energy hardship with low credit scores, deliver targeted wrap-around services, and provide tailored pricing and payment plans. Options may include one or more of:

a. Provide support for accredited social retailers eg through an industry fund, social generation hedge obligations or government funding

b. Government contracts one or more retailer(s) to act as a social retailer

c. Government support for community/regional integrated social generator-retailers

d. Government support for a nationwide integrated social generator-retailer

Q57. Do you broadly support the proposed strategy AC5?

- Yes
- Somewhat
- No
- Don't know/Not sure

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.

The wrap around services that social retailers can provide are key to reducing energy usage at the source so are important, but are clearly not traditional energy retailer core business. The social retailers who perform this intensive and expensive work can not pay for this with their energy retail margin, so a central fund to perform this work would be important to setup.

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) A mandatory social hedge available for accredited social retailers will allow for small social retailers to have certainty on pricing, and not be as exposed to the volatile wholesale market
- b) The social retailing aspects of wrap around services could be contracted out to either retailers or Care Agencies who are sufficiently trained. There needs to be money available for who ever is caring for the customers to be paid to do it.
- c) Supporting communities to build resilient community generation is going to be increasingly important for climate change and other natural disaster challenges. Invest in building these resilient options before they are needed to reduce the impact when the challenges arrive.
- d) Social retailers now have the distinct disadvantage the they do not generate the energy that they would wish to sell. This could be addressed by mandatory affordable hedges available for the social retailers as in a), or government generation could be dedicated to provide for those retailers. The important point is that the retailer and the customer should not be exposed to volatile market pricing because a very small change in pricing can put people in hardship right over the edge of financial stability.

Q60. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Prioritise domestic energy prices to be below that of commercial.

Challenge: The energy transition presents new opportunities but risks leaving lower-socio-economic whānau behind

Strategy AC6: Ensure those in energy hardship can access the benefits of, and do not face undue costs from, the transition to low emissions energy, including explicitly reflecting energy wellbeing requirements in Government's Equitable Transition Strategy, Energy Strategy and Gas Transition Plan

Q61. Do you broadly support the proposed strategy AC6?

Yes

Somewhat

No

Don't know/Not sure

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.

Lines charges are going to be a big problem for people in energy hardship. The transition to low emissions energy is going to cost a significant amount for lines companies, and this cost usually has to be passed on to the consumers using that infrastructure. This may have to be addressed collaboratively by EDBs and government so that the lines charges are not raised significantly.

Q63. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Perhaps lines charges can be maintained as a certain percentage of energy pricing nationwide, eg EDBs can't charge more than x cents per kWh nationwide, if the costs are higher, then central government helps to pay for that infrastructure.

FINAL QUESTION FOR ENERGY ACCESSIBILITY AND CHOICE KETE:

Q64. Are there any other key challenges and/or corresponding solutions relating to the ENERGY ACCESSIBILITY AND CHOICE KETE that we have missed? If so, please outline these below.

ENERGY AFFORDABILITY KETE

Affording the energy whānau need for their wellbeing

Challenge: Low income is a major barrier for many whānau to afford the energy they need for wellbeing in their home

Strategy AF1: Prioritise lack of energy access as an emergency issue and implement nationally consistent processes and timeframes for responding to requests for assistance from customers in energy hardship/their advocate/retailer, and establish clear and direct lines of communications between MSD and those customers/their retailer/advocate

Q65. Do you broadly support the proposed strategy AF1?

- Yes
- Somewhat
- No
- Don't know/Not sure

Q66. Please share your comments on the proposed strategy AF1. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.

Supply / pay a base level of energy for 12 months a year rather than a winter payment.

Challenge: Low income is a major barrier for many whānau to afford the energy they need for wellbeing in their home

Strategy AF2: Provide extra Government financial support, needs-based and targeted at households in energy hardship, including those outside the existing beneficiary group. Possible mechanisms include better targeting of the Winter Energy Payment (WEP) eligibility criteria/funding levels, an energy-related income supplement, an energy bill rebate, and making a portion of energy-related grants non-recoverable

Q67. Do you broadly support the proposed strategy AF2?

- Yes
- Somewhat
- No
- Don't know/Not sure

Q68. Please share your comments on the proposed strategy AF2. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.

AF2 is exactly what the Empower Energy platform provides the mechanism to deliver. By leveraging the vast number of financial mentors, home advisors, energy navigators and other Care Agency providers already dealing with the 'coal face' of hardship in the community, the Empower Energy platform provides a sleek method to take funds from the Empower Energy Hardship fund, and direct an appropriate amount directly to the energy account of clients seeking help. The fund can be filled by government, eg MSD, but also by philanthropic corporations, energy generators, and everyday kiwis who can top up their energy bill with a donation. The Empower Energy Distribution platform could be a far more efficient means of delivering the WEP to people who genuinely need it.

Challenge: Low income is a major barrier for many whānau to afford the energy they need for wellbeing in their home

Strategy AF3: Ensure all fees and costs charged to energy consumers are cost-reflective and reasonable (including pre-pay, disconnections, reconnections, top-ups, bonds, metering)

Q69. Do you broadly support the proposed strategy AF3?

- Yes
- Somewhat
- No
- Don't know/Not sure

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.

Pre pay agreements should not cost any more than post pay. Automated processes should not incur charges, so disconnection/reconnection, top ups, any current fees that put disadvantaged people into further financial distress should be banned immediately

Q71. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Challenge: Pre-pay accounts often impose significantly higher costs on those most in need and self-disconnection is hidden

Strategy AF4: Review and monitor the use and pricing of pre-pay accounts to ensure they do not create or exacerbate disadvantage, including tracking and publishing self-disconnection (how many, how often, for how long) and reviewing pre-pay terms and conditions, fees, wraparound support

Q72. Do you broadly support the proposed strategy AF4?

- Yes
- Somewhat
- No
- Don't know/Not sure

Q72. 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.

As per AF3, Pre pay agreements should not cost any more than post pay. Tracking and publishing of self-disconnections should be mandatory, and should be used as indicators of wraparound support being required. Some wraparound support would be referring the customers to Caring Agencies who could utilise the Empower Energy credit tool to top up the account in question to give the customer some breathing room, while the wraparound service helps with energy efficiency and literacy matters that can help with the long term reduction in energy use.

Q74. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Challenge: Payment options may impact affordability and choice

Strategy AF5: Require retailers to include payment options that recognise the difficulty those in energy hardship face, e.g. cash payment, smooth pay, weekly or fortnightly billing/payment

Q75. Do you broadly support the proposed strategy AF5?

- Yes
- Somewhat
- No
- Don't know/Not sure

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.

Smooth paying is increasing popular and effective, as is weekly billing.

Q77. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Some problems that may arise from some initiatives is the 'locking-in' of the customer to that particular retailer, so some clear rules about changing retailers should be established so that a retailer change is still easy.

Challenge: Distribution pricing methodologies can impact affordability

Strategy AF6: Investigate and address the implications of network pricing methodologies for energy hardship, particularly in high cost-to-serve areas

Q78. Do you broadly support the proposed strategy AF6?

- Yes

- Somewhat
- No
- Don't know/Not sure

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.

As per AC6, upcoming expenditure to increase the local grid's ability to support renewable and distributed generation is going to have significant costs, and traditionally these costs are passed on to the consumers. Under the traditional regime, the higher costs are spread among the energy users somewhat evenly (albeit proportional to energy usage). Some mechanisms to have lines charges reduced or subsidised for people in energy hardship would be made possible by having the nomination of recipients of the Empower Energy Hardship Credits be validated as 'in genuine energy hardship' which would then allow for subsidies or rebates put towards those people. This can be fraught if the EDB provides a discount, but the energy retailer does not pass this discount on, so having the third party approach that Empower Energy's platform provides to keep the billing simple, but provide a suitable credit could be a workable solution that can work without regulation changes, or complicated arrangements between the 29x EDBs and many electricity retailers.

Q80. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

FINAL QUESTION FOR THE ENERGY AFFORDABILITY KETE:

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.

CONSUMER PROTECTION KETE

Protecting energy consumers in their relationships with providers

Challenge: The Electricity Authority's Consumer Care Guidelines (CCG) are voluntary and there is no regulatory penalty for not complying

Strategy CP1: Review and strengthen the Consumer Care Guidelines including expanding to include mandatory consumer care obligations on all electricity retailers

Q82. Do you broadly support the proposed strategy CP1?

- Yes
- Somewhat

- No
- Don't know/Not sure

Q83. Please share your comments on the proposed strategy CP1. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.

There should be some minimum mandatory consumer care obligations for all retailers

Challenge: The Electricity Authority's Consumer Care Guidelines (CCG) are voluntary and there is no regulatory penalty for not complying

Strategy CP2: Strengthen monitoring, compliance and enforcement of the Consumer Care Guidelines, including a penalty and reporting regime for non-compliance

Q84. Do you broadly support the proposed strategy CP2?

- Yes
- Somewhat
- No
- Don't know/Not sure

Q85. Please share your comments on the proposed strategy CP2. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.

Once some guidelines are mandatory, there will need to be some level of monitoring and enforcement

Q86. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Challenge: There is a lack of reporting and monitoring of key energy hardship information from electricity retailers

Strategy CP3: Require electricity retailers to report key energy hardship indicators to the Electricity Authority for it to monitor and publish (e.g. number of customers refused supply, disconnection numbers/durations/reasons, customer debt levels, bonds, pre-pay, referrals to Income Support, retailers' alignment with Consumer Care Guidelines)

Q87. Do you broadly support the proposed strategy CP3?

- Yes
- Somewhat
- No

Don't know/Not sure

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.

Empower Energy has found it very challenging to describe the level of energy hardship and deprivation in Aotearoa, as noted by the Expert Panel too, the lack of centralised data is a major barrier to understanding the extent of the issue, and therefore difficult to try to form a suitable response. Empower Energy would fully support mandatory monitoring of energy hardship indicators, so that progress towards reducing energy hardship with diverse strategies can be measured.

Q89. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

Challenge: Other consumer protection regimes and dispute resolution schemes may be too narrow as new technologies and business models emerge

Strategy CP4: Expand consumer protection and existing dispute resolution schemes to cover other forms of energy provider relationships taking an energy hardship lens e.g. solar power providers

Q90. Do you broadly support the proposed strategy CP4?

Yes

Somewhat

No

Don't know/Not sure

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.

Widening the consumer protection regime makes perfect sense as new technologies emerge. Taking care not to have too much overlap with other protection agencies might require considered collaboration to avoid duplication. The process should not be a 'pass-around the agencies' for the consumer though, or it will be ineffective.

Q92. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.

FINAL QUESTION FOR THE CONSUMER PROTECTION KETE:

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.

SUPPORTING ENVIRONMENT AND ANY FURTHER COMMENTS

The Panel has identified a number of supporting or enabling elements it considers are important for the landscape surrounding energy hardship initiatives, to ensure the proposed strategies can be implemented effectively and in a long-term sustainable manner.

These include:

- *Data and insights*
- *Learning environment*
- *Leadership and coordination*
- *Participatory approach*
- *Collaborative service models*
- *Durable funding environment*
- *Targeting of solutions*

Please see the Supporting Environment section of the Discussion Paper for more information.

Q95. Do you have any comments on the Supporting Environment section? Please share these below.

Data and Insights will be increasingly important to measure the extent of energy hardship, and the extent to which strategies are working or not working to address the issues.

The Collaborative service model is what Empower Energy is building by having all energy retailers enabling donations through bill top-ups, as well as getting EDBs and crown on board able to invest in building the platform and enabling donations to the hardship fund.

The collaborative approach is also leading into the durable funding environment, the elegance of the Empower Energy platform is that it can take funds from a variety of sources, run a very lean and automated platform, and outsource the identification of people in hardship using existing and trusted Care Agencies.

Using our network of Caring Agencies also helps with precise targeting of the hardship relief efforts. Rather than a broad stroke approach of community service card, or pensioners that the Winter Energy Payment uses, the Empower Energy model goes beyond that because some families who do not qualify for a community services card will at times still be in energy hardship due to unforeseen circumstances and may need assistance, and should not be denied because of some rigid criteria. By trusting the Care Agencies to

assess the situation, we are giving them, the true experts, the 'agency' to make the right decision about who should receive what kind of relief.

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.

Thank you

We appreciate you sharing your thoughts with us. Please find all instructions for how to return this form to us on the first page.

We will consider your submission as we work towards developing final recommendations for the government by 30 June 2023.