

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?* Mark Hughes
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. Paua to the People Limited
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 checked="" type="checkbox"/> Energy retailer <input type="checkbox"/> Energy regulator <input type="checkbox"/> Energy distributor <input 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 HH2: 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.

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

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.

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

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.

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.

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

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.

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.

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.

Q30. 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 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.

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.

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.

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.

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

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.

Comparability is the role of Consumer Powerswitch. Ensure that they have funding to do their role either funded by the Energy Levy or Government budget. The issue however remains that households in energy hardship have little choice as they fail credit reviews.

We do not consider it a regulatory responsibility to mandate on our communications with our customers nor mandating the format of bills

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

Distributor pricing makes up more than a third of our costs. As such we like every other independent retailer must follow the pricing methodologies of distributors in setting our tariffs. Simplifying distributor tariffs would immediately simplify our tariffs.

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.

Having Post Pay as the objective here should not be the goal. As a society we should be seeking to have whanau able to access competitively priced electricity rather than just loading a retailer and the whanau with debt they cannot afford. Furthermore, some whanau should be guaranteed their electricity supply because it is imperative that they should not be disconnected. However, the cost for keeping whanau connected must be the responsibility of the state not retailers who are commercial entities.

The reality of life as an independent retailer is that if my customers do not pay their bills, I cannot pay my bills and I will default. The electricity industry is set up that Generators have no risk (94 days Prudential), Distributors have little risk (14 days Prudential), and Metering companies carry a negligible risk if we default. Under this model there is no way that Paua to the People could afford to carry customers that cannot pay.

As stated in the review of the NZ Electricity Market in 2019 the responsibility for some whanau being unable to pay must be paid for by the State not retailers.

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

Focus on getting affordable electricity to our financially vulnerable whanau.

Paua to the People has already been exploring ways that we can deliver more competitively priced electricity to customers with poor credit and have shared some ideas with the Minister and some of her officials. We would welcome the opportunity to discuss our solutions with the Panel. Our ideas could in fact be introduced quickly if we were able to obtain a minimum of support and competitively or favourably priced forward cover.

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.

Disconnections will only be the last resort if the retailer can get some expectation of getting paid. Gentailers have been using disconnections to get whanau onto prepay and to use prepay to recover debt.

Because of the stringent Prudential requirements independent retailers need to have an expectation of payment soon. A reduction of Prudential requirements may be beneficial for reducing the speed late paying customers are disconnected.

Penalties for wrongful disconnection would be unfair as postal addresses do not in many cases exactly match the ICP for the address on the Registry. It is the Distributor's responsibility for this to be addressed. Furthermore, as a retailer we are reliant on customers to supply us with the correct ICP/Address which does not happen in all cases. Also, what effect would this have on the situation.

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

Focus on making electricity more affordable and giving all whanau with poor credit choice of supplier.

Happy to discuss our proposal to do this in months rather than years if you contact us.

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.

Metering companies act at the behest of the retailer. Puaa to the People has to pay for a meter change and we have never been able to afford (over a year's margin) such an upgrade for individual customers who could leave us tomorrow. Other retailers (read Gentailers) have enjoyed free installation of AMI meters.

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

Possibly increasing the levy to provide a fund to replace prepayment meters could be a solution.

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.

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

Paua to the People has developed capability to deliver a Retailer as a Service to such communities whereby we would operate a retailer on behalf of a community while they own it, set customer policies and pricing. Using a RaaS model will enable communities to get up and running quickly and at little cost. Ongoing costs would also benefit greatly from our expertise and economies of scale.

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.

There are several socially based retailers operating or envisaged. Unfortunately, the NZ electricity market is not well suited to independent retailers let alone those willing to operate at breakeven or with delayed credit collection.

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.

We support the concepts of social hedges for retailers servicing energy poor whanau as well as access to Government or other funding. But we do not think that this will be enough.

Having a single government contracted Retailer of Last resort is in our opinion not the best option. We believe that financially vulnerable whanau to have a choice of supplier not be required to be supplied by the poor people's retailer. Multiple suppliers will encourage innovative solutions to managing this customer group at an affordable cost. A lack of competition for these customers has already resulted in uncompetitive rates, excessive costs, and poor levels of service – is this what we want to recreate?

Furthermore, many communities are wanting their say in how electricity is supplied to their whanau.

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

Some additional requirements could include, lower prudential requirements, government guarantees for nominated properties/whanau (where the retailer can bill the government for the unpaid portion of bills), direct application of energy grants directly to customer accounts.

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.

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

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.

Agreed. But it must be very cost efficient for both the retailer and funding agency. Our RaaS systems can proactively keep customers connected, or if the customer defaults bill the funding agency in advance or arrears for keeping whānau connected.

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.

It must be added directly to customer's electricity accounts in an affordable manner. Pua to the People is able to do this.

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.

Any retailer servicing financially vulnerable customers should be focussed on not passing un-necessary costs onto whanau who cannot afford to pay for it.

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

Paua to the People's Retailer as a Service is willing to service individual customers for \$5 per month (including all operational and servicing costs of being a retailer).

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.

The issue with prepayment is that the Gentailers are using them to recover bad debt from customers who have defaulted. No competition in the prepayment market has resulted in them charging what they like.

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

Paua to the People and our RaaS model can both offer prepayment and would like to offer competition to the gentailers but have been unable to as we have been unable to source competitive hedges from those same gentailers.

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.

The issue is that an independent retailer is required to manage their cashflow to meet 94 days of generation prudential. Some of these payment methods are not consistent for meeting our cashflow commitments. Care should be taken as to the costs and cost recovery of such payment methods and wrap around services as they should not be borne by whanau nor retailers.

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

Financially vulnerable customers should be able to access weekly bills.

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.

Distributor pricing makes up more than a third of our costs. As such we like every other independent retailer must follow the pricing methodologies of distributors in setting our tariffs. Simplifying distributor tariffs would immediately simplify our tariffs.

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

Have the EA regulate Distributors

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.

The EA proudly struts out that they regulate all retailers the same. It is true they treat me the same as a retailer with 100k customers adding out of proportional costs of compliance. Mandating how I serve my customers and adding even more reporting is not consistent with attempting to minimise costs that must be passed onto customers. Small retailers do not have the luxury of headcount to devote to be consistent with the Customer Care guidelines. Instead, we do what we can for our customers.

Are small retailers really the issue you are trying to tackle, or will you drum us out of business while the gentailers sail merrily on?

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.

A penalty for non-compliance? Seriously? Meridian faced no consequences for manipulating the wholesale market and you want to penalise Retailers who are doing what they can with customers unable to pay?

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

Encourage competition for whanau with poor credit.

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.

The EA proudly struts out that they regulate all retailers the same. It is true they make my compliance costs way out of proportion. But they do not actually treat small retailers the same as other industry participants (including gentailers) as we do not have access to teams of lawyers. It is unsurprising that the EA's contribution is to require more reports from retailers.

Furthermore, I have yet to see the EA act on any poor indicators so what is the point of increasing retailer costs to gather information that is never used. Please focus on the things that will make a difference for our financially vulnerable whanau rather than just load more cost onto retailers.

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

Focus on the actions that make a difference rather than more information gathering by the EA.

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.

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.

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.