

28 April 2023

Energy Hardship Expert Panel  
c/- Energy Use team, Ministry of Business, Innovation and Employment  
15 Stout Street  
Wellington 6140

Via email [EnergyHardshipMBIE@mbie.govt.nz](mailto:EnergyHardshipMBIE@mbie.govt.nz)

Tēnā koutou,

## Energy affordability, reliability and sustainability in a low carbon future

Electricity and gas distribution is part of the energy cost faced by consumers. Powerco is one of Aotearoa's largest gas and electricity distributors, supplying around 340,000 (electricity) and 112,000 (gas) urban and rural homes and businesses in the North Island. These energy networks provide essential services and will be core to Aotearoa achieving a net-zero economy in 2050.

The energy hardship discussion paper is more focused on electricity, which is therefore the focus of our response. In identifying the challenges and way forward with energy hardship, it is important to consider energy broadly. For example, potential pathways for Aotearoa's gas transition, the differences between electricity and gas distribution, and consumer decisions in energy options, will all impact energy affordability in different ways. We have responded on the Energy Affordability Kete in the attached submission form. Our summary views on the Energy Affordability kete are:

### Energy Affordability

- A national approach will avoid energy access or equity issues linked to the geographical or market boundaries of energy businesses (including EDBs)
- Household support should be targeted for a household's energy circumstances.

We appreciate the engagement by the Energy Hardship Panel prior to finalising the strategy. We also note our support for the ENA submission, representing all electricity distributors. If you have any questions regarding this submission or would like to talk further on the points raised, please contact me Privacy of natural persons.

Nāku noa, nā,



**Andrew Kerr**  
Head of Policy, Regulation, and Markets  
**POWERCO**

# Submission Form

## 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.	<b>What is your name?*</b> Andrew Kerr
Q3.	<b>Do you consent to your name being published with your submission?*</b>  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No
Q4.	<b>What is your email address? Please note this will not be published with your submission.*</b> Privacy of natural persons
Q5.	<b>Are you submitting as an individual or on behalf of an organisation?*</b>  <input type="checkbox"/> Individual (skip to Q8)  <input checked="" type="checkbox"/> Organisation
Q6.	<b>If on behalf of an organisation, we require confirmation you are authorised to make a submission on behalf of this organisation.</b>  <input checked="" type="checkbox"/> Yes, I am authorised to make a submission on behalf of my organisation
Q7.	<b>If you are submitting on behalf of an organisation, what is your organisation's name? Please note this will be published with your submission.</b> Powerco
Q8.	<b>If you are submitting on behalf of an organisation, which of these best describes your organisation? Please tick one.</b>  <input type="checkbox"/> Iwi, hapū or Māori organisation  <input type="checkbox"/> Energy retailer  <input type="checkbox"/> Energy regulator

- Energy distributor
- 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](mailto: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.**

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

**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.**

**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.**

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

*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.**

**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.**

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

*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.**

**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.**

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

*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.**

A national approach is appropriate given

- the circumstances affecting the lack of access will not overlap equally with the market shares or geographical footprints of energy businesses
- it will avoid distorting competitive retail offerings to these customers in the future

*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.**

To be sustainable, this strategy will benefit from being targeted and sized at those households with low income. It would be assisted by a direct or implicit assessment of the degree of financial support needed given a household's living cost pressures. For example, the WEP doesn't scale for the number of household occupants, location, or housing quality (all which can affect energy requirements).

*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.**

Effective implementation of the energy affordability strategies should support this outcome because financial support may involve paying some of these costs.

**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.**

Understanding the link between disconnection data, behaviour, and cost will ensure any policy initiatives are targeted at the right situation.

**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.**

Possibly better to address via the implementation of AF3.

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

*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.**

Network costs (distribution and transmission) are a substantial component of a household's energy bill. Our response to AF2 noted that the circumstances affecting households with low income can be location and situation specific - they won't overlap equally with business boundaries. Pricing methodologies treat consumers (demand) equally and affect large groups of customers – they are not targeted.

We support a response funded at a national level (AF3) rather than being addressed by individual EDBs. At an EDB level, costs not paid by some customers will be implicitly paid for by other customers and businesses on that footprint, potentially exacerbating affordability for some other customers.

An understanding at a national level of how network and wholesale pricing affects affordability could be useful for implementing strategy AF3 (targeted support). For example, if wholesale and network prices are higher in region A vs region B, this could inform the nature and scale of support needed in the two regions.

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

We suggest differentiating between “capital contribution” policies and pricing methodologies. Both are required to be published under Commerce Commission disclosure requirements, yet they relate to different aspects of the cost to a consumer. For example, for a customer looking to connect a new building (eg marae) a significant distance from the existing network, a distributor’s capital contribution policy will inform how the costs for the connection works will be recovered. The pricing methodology will inform the annual delivery charges.

We welcome the opportunity to explain how Powerco’s latest [pricing methodology](#) and [capital contribution guide](#) work in practice.

**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.**

*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.**

**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.

**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.

**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.