

Submission Form

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']

Yes

No

Q2. What is your name?* Cheryl Davies

Q3. Do you consent to your name being published with your submission?*

Yes

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 Please note this will not be published with your submission.*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?*

Individual (skip to Q8)

Organisation

Q6. If on behalf of an organisation, we require confirmation you are authorised to make a submission on behalf of this organisation.

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

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.

Tākiri Mai Te Ata Whanau Ora Collective (Te Awakairangi)

Q8. If you are submitting on behalf of an organisation, which of these best describes your organisation? Please tick one.

Iwi, hapū or Māori organisation

Energy retailer

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 - 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.

We are extremely supportive of a strategy that aims to address many of the challenges and barriers whanau are facing that prevent them from living in a healthy home. However, we believe one of the key risks is an inability to ensure equitable access for those whanau who are our most vulnerable. As an example, there needs to be better coordination and communication between key stakeholders including govt agencies, NGO's Māori providers, City Councils, etc. We strongly support improved access to programmes like the Warmer Kiwi Homes (WKH) programme, however, this is often not readily taken up by eligible whanau in our communities because they simply don't believe this is 'for real', they have had many knocks by the system and often become distrustful. Under our Tuanui programme (home repairs programme), we have worked closely with EECA to release the addresses of eligible whanau for WKH's in our community. We can now follow up with these whanau, many of whom we already work alongside or have a trusted relationship to ensure they take up this offer. However, many whanau cannot even afford the 20% top up required. The criteria to be accepted can be frustrating, e.g., we had a kaumatua, 70+ who was declined because they had a woodburner in their lounge. To be eligible, they had to 'decommission' their woodburner. We had to advocate for the whanau to say they are too old to carry wood inside and their health was compromised. I worry for other whanau who don't have someone to advocate for them. This type of process is what deters whanau from participating in programmes like WKH's.

This initial housing support can then open the door for our Wellhomes (HHI) programme to provide additional support, thermal curtains, draft stoppers, blankets, bedding,

education and energy efficiency tips, etc. It becomes a domino effect, while we are in the home, we cover a broad range of interventions and wrap around support services.

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

Adequately resource those community providers who are instrumental in delivering these programmes to their communities, e.g., our Tuanui (home repairs programme) makes a significant difference for whanau who are living in poorly maintained homes. The flow on benefits of replacing broken windows, safely rewiring live wires in homes, fixing pipes that are leaking raw sewage under the house, repairing a roof that leaks in 12 places, removing nails that keep windows closed and educating whanau about the importance of opening windows cannot be understated. We spend a huge amount of our time sourcing philanthropic funding to undertake this work. The money saved in reducing hospitalisations alone because whanau are living in warm dry homes with adequate heating, insulation, curtains, etc should be acknowledged as money well spent.

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.

In many cases, community home repair programmes ensure interventions like WKH's can be implemented. With our Tuanui programme, we have been able to repair leaking roofs, holes in floors and broken windows and doors that reduce the effectiveness and even the ability to provide insulation and heating. This has enabled Tuanui to refer on to WKH's. We are aware that even the 20% top up is not affordable for many whanau, we are fortunate to be able to fully subsidise this cost through philanthropic funding. We see the immediate positive effects of whanau living in warm, dry homes. However, sourcing funding is a constant nightmare and results in multiple funding accountability reports, time and resource that is often underfunded.

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

Adequately fund proven home repair programmes to provide full wrap around support – home repairs, well homes interventions (HHI programme), energy efficiency support, safer kids, health and social services. This comprehensive housing support addresses more than just energy hardship and in turn this ensures sustainable, long term solutions.

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.

We strongly support the need to strengthen monitoring, compliance and enforcement of the Healthy Homes standards. The standards are weak without monitoring, compliance and enforcement to accompany them and as a community provider, we often do not have the resource required to follow this through and provide adequate support.

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.

Yes, we definitely see a number of whanau living in social and private rentals who are experiencing energy hardship and they require good advocacy and support but we are also starting to see a number of homeowners who are also experiencing hardship. The rise in mortgage interest rates, after effects of covid, lack of rentals means they have had to open up their homes to other whanau, have created another layer of hardship amongst low-middle income earners. I think we should be very careful how we prioritise this strategy. Through our Tuanui home repairs programme, we are seeing a lot of hardship amongst Māori homeowners, please ensure they are not left out of 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.

To reduce barriers, there needs to be workforce training amongst the MSD staff so that they understand the importance of promoting energy efficient appliances rather than encouraging whānau to look in second hand shops for their appliances because they are affordable and repayments need to be affordable so we are not creating further financial hardship.

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.

This roopu is important to support this kaupapa nationally, regionally and locally. Having regional or local groups that feed into a national roopu ensures we have our ear to the ground. A national strategy is important but it is also vital for communities to feel local ownership for programmes like this.

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.

Once again this becomes an issue of equitable access, accessing Home Performance Advisor training comes at a large cost to the provider. If this was affordable training that could be delivered regularly in our own region, this would be a solution. There also needs to be a more practical training session that provides basic knowledge to kaimahi and community health workers, whanau ora navigators, etc who are already working with whanau in their homes. This would give enough knowledge for the kaimahi to make good referrals to housing support services/programmes like HHI's, Tuanui, Wellhomes.

Absolutely, this strategy is important when we are working with Māori communities, we are delivering our programmes with a whanau-centred, Te Ao Māori perspective, e.g., I wouldn't be calling this training an energy wellbeing navigator training, I would give it a Māori ingoa and we would ensure that participants understand the importance of wrap around support, a whanau ora and whanau centred approach to addressing energy hardship.

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.

As discussed above, finding funding for the Tuanui programme is a constant headache. Sourcing multiple Philanthropic funding sources can be very taxing on both time and energy. Despite Tuanui being an exemplary programme, we have never felt that MBIE would be an entity that we could approach for funding. Tuanui and Wellhomes are trusted providers of energy efficiency programmes to their communities but this hasn't made things any easier.

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.

This also needs to be provided 'by Maori, for Maori' and it needs to accommodate for a basic training as well as a comprehensive programme.

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.

We support this strategy.

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

Yes, we support this strategy as one form of communicating but it needs to be user friendly and it should link in with existing websites and sources that are trusted sites within communities, e.g., our whanau ora collective website

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 bills have always been an issue, they are complicated and often whanau don't understand where all their energy is being consumed. We strongly support improved comparability across electricity tariff structures and price comparison structures. There

should be consistency across the sector to provide simple easy to understand bill and pricing information.

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

Can we make it a consistent billing system across the electricity providers. Reading bills is impractical and should be part of the basic training that is provided to community providers who can then pass this knowledge on to whānau. It shouldn't be difficult to understand how much power is being used, how much is owing, etc but it is complicated reading power bills for whānau.

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.

Alongside this strategy there needs to be support from Budgeting services and community groups for whānau who find themselves in arrears. Any arrears need to be picked up early before it becomes a big issue for whānau. This would be great if it could happen, we fully support 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.

We fully support this strategy, we have seen whanau who have lived without power for weeks, children become unwell, there is distress and a sense of hopelessness within those households. We have supported many whanau who have fallen behind in their power bills, this may be due to a child being unwell and the need to turn the heater on through the colder months or sudden loss of employment for the main wage earner.

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

Disconnection should not be an option at any cost. Early intervention alleviates the need to disconnect household energy, we have whanau who are owing thousands, why has this happened, why wasn't an earlier intervention put in place to minimise the amount of money owed? I don't think it should be the energy companies that work with the whanau when they fall behind in their payments, this could then be referred to community agencies (who have been resourced to provide energy hardship support). Often falling behind in paying power bills is only part of the problem, to ensure long term solutions, we need to be able to provide wrap around support that ensures long term solutions.

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.

We support this strategy, we saw the effects of the recent cyclone and the hardship caused by having no power or communication. It makes sense that rural areas should be prioritised for off-grid energy systems. We also support the need to look at marae, Papakainga and public housing to provide solar energy to help reduce energy costs and reduce the risk of poverty and hardship for whanau

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

This would be an important area to prioritise the WKH's programme, how many households have not accessed the programme? Enable community providers to lead programmes for their communities. We also support the need for many marae to be off the grid, we have seen marae become focal civil defence centres in the aftermath of natural disasters in Aotearoa, resource marae to ensure they can continue to be sustainable emergency centres.

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.

This is a nationwide issue, finding retailers for whanau who have poor credit ratings is a constant battle. Accessing budget advisors is another constant issue, they are few and far between and whanau struggle to meet with a budget advisor in a timeframe that reduces the risk of either being disconnected or there is a time lapse between being disconnected and signing up to another retailer resulting in whanau having no power for periods of time.

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.

I'm not sure on these options, we really need to have a cost effective, long term solution that is sustainable and there is consistent measures and processes in place across the country. I wouldn't want to see a retailer being able to establish something that is only accessible in one area, this causes confusion and inconsistencies across the regions. In saying this, I believe there should be flexibility in any approach we adopt, often there may be changes that need to be made to ensure we have covered all the bases during that trial period.

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.

We strongly support this strategy, desperation forces whānau into signing up to agreements that create further energy and financial hardship that snowballs into whānau not having food in the cupboards, shoes for school, etc. I am hopeful that the government's Equitable Transition Strategy will provide some assurance that whānau will not be faced with unwarranted costs from the transition to low emission energy.

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.

We strongly support this strategy, there is a siloed approach to

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.

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.

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.

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.

We support this strategy, there should also be an option to refer to a community group who have a focus on supporting whanau through energy hardship.

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.

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.

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.

The CCG have no teeth unless they are being monitored, we support regulatory penalties for those electricity retailers who are not complying.

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.

Absolutely, this should be a mandatory requirement for all energy retailers to provide this information. How can we develop sustainable options to reduce energy hardship when we don't have all the information to inform our decisions.

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.

All of these enabling elements form a sound and practical way forward. **Data** needs to be carefully considered – how are we collecting this information and how are we reporting this back, otherwise what is the purpose of collecting information. **Learning environments** need to be conducive to best learning opportunities for those community providers who are key to supporting whanau/families living in energy hardship, ie minimal to no cost for training, 'by

Māori, for Māori, train the trainer opportunities to ensure sustainability, marae and community venues are important to hold training. There are **community leaders** within providers who are trusted within their communities, these are the people who will need to lead any initiative in their communities. A **participatory approach** will only work if we have a level playing field and there is a true meaningful partnership with providers and community. **Collaborative service models** must ensure equal opportunities to input into service design and delivery. **Durable funding solutions** are key to the success of this work, innovation funding or seed funding is not sustainable and often creates short term rather than long term solutions. This strategy needs to ensure a timeframe that enables the provider to implement their programme with flexibility to adapt and make changes to meet the needs of their communities. As a whanau ora collective, a 'strengths based' approach ensures we are always looking at **solutions** rather than a deficit focus.

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.

Nga mihi ki a koutou, thank you for providing this opportunity to provide feedback on this very important kaupapa.

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.