

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?* Ivy Harper
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. Te Pūtahitanga o Te Waipounamu
Q8.	If you are submitting on behalf of an organisation, which of these best describes your organisation? Please tick one. <input checked="" type="checkbox"/> Iwi, hapū or Māori organisation <input 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.

NA

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.

Perhaps there should also be an examination of who is eligible for the Warmer Kiwi Homes grant? Currently you may meet eligibility for the grant for two of the criteria (own the home that was built before 2008) but may not have a Community Services card because their income is just outside the current rates. The final criterion is if you live in a lower income area but not all homes that need such support are in lower income areas. Some of the homes are built in the older parts of 'higher' income areas and so while the whānau may not qualify for a Community Services card, the wider area makes the whānau ineligible even though they may have been living there for years.

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

Perhaps one way to address the 'older' homes in areas that may not be considered eligible because of the area, that there is a separate assessment if they can meet the first two criteria. The assessment may involve a visit from someone who can confirm that they do not have ceiling or underfloor insulation which many of the older homes do not. Consideration could also be given for reviewing the criteria for those who can show they are just outside of the threshold but meet the rest of the criteria.

Te Pūtahitanga o Te Waipounamu does note that in researching the figures of who is eligible for a Community Services Card, the current rates are before tax. For example, a whānau of three is eligible for a yearly income of less than \$75,645 (before tax), which is around \$58,000 (after tax). This is just slightly more than the Living Wage which is due to change on 1 September 2023 to \$26.00 per hour or \$54,080pa but this is the rate before tax. After tax the figure is \$44,085pa. The figures for meeting the eligibility of a Community Services Card are low and then after tax, whānau are expected to live on an even lower rate.

However, should a whānau be earning more than this figure (\$75,645pa) and still meet the criteria of a family of three, they are ineligible because they exceed the rate allowable for a Community Services Card, which is low anyway. Add the fact they then live in an area which makes them 'ineligible', then they miss out again. One on the Community Services Card and the other because they do not live in a 'low-income area' even though their whare may meet two out of three of the criteria for the Insulation Grant. The current checklist for an insulation grant is:

- You own and live in a home built before 2008.
- You (the owner) have a Community Services Card or live in an area identified as low-income (visit the [application form](#) to check your address)
- Your home doesn't have ceiling and underfloor insulation. (If you had an insulation grant for a previous house, no worries, you can apply for a grant at your current home.)

Consideration should be given for reviewing the criteria for those who can show they are just outside of the threshold but meet the rest of the criteria. Additionally, the criteria for a Community Services Card should also be reviewed to ensure the rates are keeping pace with the cost of living.

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.

Retrofit programmes sound great but who will monitor the work undertaken to ensure they meet the Healthy Homes Standards?

The comments above in terms of the Warmer Kiwi Homes grant, will need to be considered such as changing the criteria in order to allow for a greater uptake of the grant.

Additionally, does the grant have to be repaid? If it does, perhaps there could be some good policies in place to support it so that interest rates do not get out of hand.

In the case of Auckland City Council, their Retrofit Your Home scheme offered ratepayers financial assistance of up to \$5000 for the installation of:

- clean heat
- insulation
- water conservation
- mechanical extraction
- fireplace decommissioning.

The loan was repaid by a targeted rate on the property over a nine-year term. More than 23,700 Auckland homes had work completed through the programme.

In 2020 they discovered some problems with the way they managed interest calculations on their Retrofit Your Home loans. As a result, they discontinued the programme and accounts have since been remediated. However, the idea was great, but maybe the interest just needed to be addressed.

[Retrofit Your Home scheme \(aucklandcouncil.govt.nz\)](http://aucklandcouncil.govt.nz)

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

Currently there is support for insulation and heating but can other areas also be a consideration such as ventilation, thermal curtains, draught stoppers, free or subsidised LEDs; and hot water cylinder wrapping or replacement to name a few.

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.

Who is responsible for certification of a home to say it has met the Healthy Home standards? Who will monitor this? Is it the role of local government or should there be an independent housing tenancy entity that monitors this?

What support is there for tenants to ask for repairs and when these are not done, that they are then taken higher but without a backlash on the tenant who has raised the issue? Unless there is a support system for the tenant, the practice of the landlords will continue. To address this, there is a need for a fair, timely, and well-resourced system that includes better monitoring and enforcement, and stronger regulation of non-compliant landlords and one that also protects the tenants where landlords are non-compliant.

Increased collaboration and referral pathways between different agencies, communities, households and whānau who need healthy home support particularly those in hard-to-reach communities would benefit from an energy wellbeing sector network as noted in the report. The network could play a key role in establishing, overseeing, and supporting this work. There must be a voice for Māori, Pacific, tāngata whaikaha, rainbow, kaumātua, whānau with tamariki, rural communities and other hard to reach groups in this network which is resourced adequately to be able to work in this space.

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.

A tenancy housing hub in local communities would be helpful as they could be more accessible to local communities. One operating could highlight those landlords that were blacklisted due to their unliveable rental properties and also provide tenancy support for whānau.

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

The energy wellbeing sector network could assist with this space as they would also be members of the community.

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.

Yes, we support HH5 and that all energy-related MSD purchase assistance programmes for household appliances to offer energy efficient choices. While low-efficiency appliances are cheap, they cost more in the long-run and that impacts on whānau.

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

MSD should allow be able to provide for the energy efficient choices even though they may cost more.

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.

Everyone should be able to live in a warm whare. Inequities in energy hardship exist for different groups with some bearing a greater burden of these challenges. Greater attention to warmer homes will contribute to greater hauora for the whole whānau. Additionally, the whare is more than a house for Māori and Pacific communities where the whare sometimes replaces important functions carried out by other spaces such as marae including tangi. Whare/home plays an important role and function in terms of social and familial engagement which is impacted upon when there are poor or substandard conditions.

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.

Te Pūtahitanga o Te Waipounamu supports the establishment of an “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. This network must not be limited by one voice to support all whānau, hapū, iwi or Māori and Pacific communities but must include everyone who wishes to participate as they will all bring a different view from their respective communities. This network must also include a voice for tāngata whaikaha, Rainbow, rural, kaumātua and families with tamariki.

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

The network does not need to include one voice from each of these sectors but rather many so that there is diversity on voice across communities. If they are locally drive and based, this should allow for greater involvement.

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.

Any programme will need to be cognisant of Māori and Pacific worldviews. Additionally, whoever is contracted to deliver (such as the form of delivery) either through an organisation or 'Navigators', they must also have the trust of the community and have a community of practice that always put the wellbeing of whānau at the centre of any kaupapa.

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

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

Q33. Do you broadly support the proposed strategy KN3?

Yes

Somewhat

No

Don't know/Not sure

Q34. Please share your comments on the proposed strategy KN3. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

Yes, 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.

Commissioning those who are already in the community and who could also be in the SEEC space who could assist with the targeted areas such as access to trusted and informed community-based energy advisers, home assessors and service navigators.

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

In Te Waipounamu, Whānau Ora Navigators already have the trust of their communities. Perhaps upskilling or providing training for more Navigators with a focus on energy or as home assessors may assist this space. However, essentially, who you put in this space must have the trust of the community to be able to enter the homes of whānau to better understand their needs.

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.

Te Pūtahitanga o Te Waipounamu supports the development and delivery of 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). Any strategy must be developed with the community it is being designed to support e.g., Māori and Pacific, tāngata whaikaha, rainbow, rural communities, kaumātua and whānau with tamariki.

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.

Any portal developed and maintained to provide a comprehensive "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 must still be communicated to the wider community else it will just be a portal. Any information must be provided in a way that is easily understood and shared with the community. Perhaps this could be the role of the informed community-based energy advisers, home assessors and service navigators?

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

See above.

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.

Simplifying energy bills and information access, improving comparability across electricity tariff structures, and improving price comparison services would be helpful but energy providers also need to be ethical in their dealings. For example, providing 'packages' of a \$300 rebate if consumers join a power company should not then be negated by higher supply rates thereby making the attractive package less attractive but the unsuspecting customer is now locked into an agreement for 12 months.

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

Energy companies should not be allowed to capture unsuspecting users this way (see above). They also have a social responsibility.

Who monitors the energy sector and perhaps there should be the collection of better information about their behaviour and compliance? For example, how many companies collect information on the number of customers they have disconnected and then reconnected? How much revenue is made this way? Is there an opportunity to make the energy sector report on the number of disconnections and reconnections and for what reason – late payment, non-payment? Is there also a better way to regulate this space so that companies can be held to account. For example, if this is the third disconnection for a whānau in 12 months, perhaps there is a greater issue at play rather than insisting that the power bill must be paid before it can be reconnected. This 'disconnection' process has forced many whānau to use prepay but this is at a higher rate and so whānau are still caught in a web of need versus ability to pay. Where the customer is also a client of MSD, perhaps there is greater discussion between the power company and MSD?

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.

Greater monitoring of the energy sector including reporting disconnections (and their reasons) every quarter.

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.

Everyone should have access to power despite adverse credit. Mechanisms must be developed to address this situation. Perhaps this could be covered in the energy strategy noted earlier?

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.
Mandatory rules must be developed for electricity retailers to follow before disconnecting for non-payment so that disconnection is a last resort. There must also be penalties not just for wrongful disconnections but also for too many disconnections. There must be other ways to ensure whānau receive power to their homes.

Q50. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.
We have heard of the huge power costs for those whānau living on Rēkohu/Wharekauri and Rakiura and very little support to these communities. There must be increased funding to support such communities. There must also be 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.

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.

Please see comments in 50 above.

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

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 that are nonrecoverable.

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.

Te Pūtahitanga o Te Waipounamu supports the comments notes and the need to 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 e.g 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.

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.

However, each option will need to be explored to ensure there are no impacts for whānau and so they set out to achieve what they are established for.

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

Whatever options are explored, that priority groups have a say and the solutions are whānau-centred.

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.

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.

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

The draft Equitable Transition Strategy, Energy Strategy and Gas Transition Plan will be available in June 2023 but what consideration has the strategy had for the summary as produced by the Expert Panel on Energy Hardship?

The draft strategy identifies challenges and opportunities that it will address including:

- Household costs: costs such as petrol and electricity may become more expensive, but there are also opportunities to reduce costs, such as by making homes more energy efficient.

However, in Chapter 15 of the draft strategy, the report noted that for consumers and industry to invest and convert to electricity, they need to have confidence that electricity will be available, affordable, and reliable, as well as low emissions. This was reinforced in submissions across all stakeholder groups, who highlighted the importance of balancing these considerations against the need to decarbonise the energy system and rapidly increase renewable electricity generation.

Some submitters from the electricity sector, NGOs, academia and individuals also expressed concern that other areas of the Commission's advice could have impacts on electricity prices. The need for well-targeted assistance for some groups to address energy equity in the transition was also highlighted. The draft strategy noted that in times when the ability to produce renewable electricity generation is limited, wholesale electricity prices can rise dramatically. This makes electricity a less attractive fuel for some consumers (page 280).

extension://elhekieabhbkmcefcoobjddigjcaadp/https://www.climatecommission.govt.nz/public/Inaia-tonu-nei-a-low-emissions-future-for-Aotearoa/Chapter-15-inaia-tonu-nei.pdf

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.

There must be a greater alignment between the Government's Equitable Transition Strategy, Energy Strategy and Gas Transition Plan and the summary produced by the Energy Hardship Panel.

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.

Te Putahitanga o Te Waipounamu supports Strategy AF1.

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.

Support

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.

Te Pūtahitanga o Te Waipounamu supports the options noted. For example, smooth pay will allow for whānau to budget for a consistent price for power for the whole year without spikes in the cost exceeding the budget and creating issues and the inability to pay.

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

None except that any fees and costs charged to consumers must be cost reflective and reasonable.

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.

Support

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

Perhaps there should be a community scheme for these hard-to-reach areas like Rēkohu/Wharekauri and Rakiura and other such isolated or rural communities. It is not enough that these locations are left to pay exorbitant energy prices.

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.

None.

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.

It is not good enough that the Electricity Authority's Consumer Care Guidelines (CCG) are voluntary and there is no regulatory penalty for not complying. This should be remedied as soon as possible.

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.

Strengthening and monitoring, compliance and enforcement of the Consumer Care Guidelines, including a penalty and reporting regime for non-compliance should occur.

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

These guidelines operate as a minimum code of conduct for power retailers when working with consumers. They are meant to guide retailers in providing good customer service. However, the guidelines are not mandatory and while it is the expectation that every retailer complies with the guidelines, retailers do not have to adopt them.

Te Pūtahitanga o Te Waipounamu believes the guidelines should be mandatory. Electricity is crucial to the health and wellbeing of households, and being unable to access electricity can cause serious harm. We note that the Electricity Authority is responsible for monitoring compliance with the guidelines, it does this through a self-reporting model. So, a retailer may rate itself on how compliant it believes it is but we note that information about which retailers are not compliant is not publicly available. This must change.

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.

Yes, electricity retailers should 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.

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

See earlier comments under question 43.

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.	<p>Do you broadly support the proposed strategy CP4?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> Somewhat</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Don't know/Not sure</p>
Q91.	<p>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.</p> <p>Solar power providers should not be exempt from their responsibility as a supplier.</p>
Q92.	<p>Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.</p> <p>Expand any dispute and resolution scheme to include different forms of power provision and hold them to the same accountability as the current energy sector or at least start work on this.</p>
FINAL QUESTION FOR THE CONSUMER PROTECTION KETE:	
Q93.	<p>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.</p> <p>There may need to be a greater understanding of the solar energy space and this information must be communicated to the wider community before whānau purchase panels and enter the solar energy space.</p>

SUPPORTING ENVIRONMENT AND ANY FURTHER COMMENTS	
<p><i>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.</i></p> <p><i>These include:</i></p> <ul style="list-style-type: none"> • <i>Data and insights</i> • <i>Learning environment</i> • <i>Leadership and coordination</i> • <i>Participatory approach</i> • <i>Collaborative service models</i> • <i>Durable funding environment</i> • <i>Targeting of solutions</i> <p><i>Please see the Supporting Environment section of the Discussion Paper for more information.</i></p>	
Q95.	<p>Do you have any comments on the Supporting Environment section? Please share these below.</p>

Many government agencies collect data and information on whānau. Perhaps some of these agencies can play a role in the collection of data that could assist in the energy hardship space. For example, perhaps MSD could capture how many whānau need support to pay their power bill or need appliances that are more energy efficient? Or how many whānau came to MSD seeking support for reconnection of their power? This information can then be used to inform the sector on what support is needed and how many whānau are affected.

There needs to be better monitoring and effectiveness of policies and programmes to alleviate energy hardship across government, industry, and the community.

It is also important that those who are impacted the most because of energy hardship must be central to this space and must remain there long after the Panel have disbanded. This means their voice must be sought and captured each time.

Any alignment and collaboration between the wide range of service providers, government supports, and local projects relevant to alleviating energy hardship, across various sectors, is critical to increasing access and impact for those in energy hardship but it must also include the voice of whānau and those hard-to-reach communities.

The funding environment must be innovative and sustainable and not be afraid to try new things, that is the notion of innovation.

Any solutions must be cognisant of how others are affected in the wider system.

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 for raising the issue of energy hardship and highlighting a number of options to address the challenges faced by many whānau. Access to a warm home should be a right for all whānau. Te Pūtahitanga o Te Waipounamu welcomes the opportunity to comment on the *Discussion Paper 'Te Kore, Te Pō, Te Ao Marama | Energy Hardship – the challenges and a way forward*.

E mihi ana

Ivy J. Harper
Pouārahi
Te Pūtahitanga o Te Waipounamu

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.