# Submission information

Perso	nal details and privacy
Q1.	l 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
	M res
	Νο
Q2.	What is your name?*
	John McCarthy
Q3.	Do you consent to your name being published with your submission?*
	🔀 Yes
	L_ 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 Please note this will not be published with your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.
	The Tindall Foundation
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

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

	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 <u>section 9 of the Official Information Act</u> that you believe apply, for consideration by MBIE.
Q11.	If you answered yes to Q9 above, please confirm you will provide publishable versions of your submission in both Word and in PDF by emailing them to the MBIE secretariat at energyhardshipMBIE@mbie.govt.nz - clearly labelling both "for publication"
	Yes
	No

#### **Responses to questions**

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

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

HEALTH OF THE HOME KETE

KNOWLEDGE NAVIGATION KETE

ENERGY ACCESSIBILITY AND CHOICE KETE

ENERGY AFFORDABILITY KETE

CONSUMER PROTECTION KETE

# HEALTH OF THE HOME KETE

Improving individual, house and whānau energy wellbeing through healthier homes

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

Strategy HH2: Strengthen and expand Warmer Kiwi Homes (WKH) programme (measures, reach and funding) so more low-income New Zealanders are supported into energy wellbeing

Q13.	Do you broadly support the proposed strategy HH1?
	🖂 Yes
	Somewhat
	No
	Don't know/Not sure
Q14.	Please share your comments on the proposed strategy HH1. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.
Q15.	Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.
	The current EECA home insulation programme needs to be expanded to include
	housing repairs. Many houses in some regions are unable to be insulated due to their
	poor state of repair. Combined funding from Te Puni Kokiri and philanthropic funders
	in Taitokerau is an example of where this is occurring successfully. Homes are being

	repaired and made warm. The future sustainability of those homes could be improved at the same time by adding solar and repairing water tanks. That is occurring for some properties in the above pilot.	
	nge: The full benefits of energy efficiency improvements cannot be accessed unless a is weathertight and reasonable quality	
	gy HH2: Fund broader building repair and improvement work to support home retrofit ammes	
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.	
	Support this as outlined in the answer to Q15.	
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.
	Could landlords be incentivised to reach the HH standards by insurance companies offering to reduce premiums where the HH standard is reached - or alternatively to limit or deny home insurance cover to the property owner until the HH standard is reached?
Challe. occupi	nge: Tenants are four to five times more likely to experience energy hardship than owner- ers
Strate	gy 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.
	nge: Energy efficient household appliances (e.g. whiteware, lighting, cooking) offer tant long-run cost savings but the higher purchase price often puts them out of reach
	gy HH5: Expand all energy-related MSD purchase assistance programmes for household nces 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.
	Possibly achieved through low-interest loans/microfinance as occurs in some instances now. Possibly combined with lower-cost deals through friendly retailers.
FINIAL	
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.
	Consider an energy rating system on all rental properties that must be advertised when the
	property is available for rent. Consider wider use of monitors that measure key data on the
	household's physical environment – temperature, humidity etc.

# **KNOWLEDGE AND NAVITATION 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	
Perfor	gy KN2: Strengthen and deliver energy wellbeing 'navigator' training (such as Home mance Advisor), including Māori and Pacific energy wellbeing training ga/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.	
	nge: There is a lack of widespread, easy access to trusted and informed community-based advisers, home assessors and service navigators	
progra	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		
on ene	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.		
Challe homed	nge: Increased support is needed to boost energy literacy among tenants, landlords and owners		
to-dat	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.		
	Good idea, but only in the context of the home being warm and dry in the first place.		
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	
	gy KN6: Simplify energy bills and information access, improve comparability across city 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.	
	QUESTION FOR KNOWLEDGE AND NAVITATION 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

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.		
047	Strongly support this concept. Some electricity retailers, including the 'social' ones like Nau Mai Rā and Toast are doing this already. Direct relationships with support services and affordable finance/debt service providers like Money Sweet Spot would also be helpful for all energy retailers. We're aware that Mercury has started to do this through its 'Home Sweet Home' initiative. We support connecting energy retailers to support services more systemically - along the lines of the Thriving Communities Partnership in Australia. We are working with others on establishing a version of TCP in Aotearoa and would welcome the chance to work further with the Panel on that if that would be helpful.		
Q47.	Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.		
Challe	nge: Households struggling to pay their bills face disconnection		
non-p	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 AC22		
	Do you broadly support the proposed strategy AC2?		
	Yes		
	⊠ Yes		
	∑ Yes □ Somewhat		
Q49.	<ul> <li>✓ Yes</li> <li>☐ Somewhat</li> <li>☐ No</li> </ul>		
Q49.	<ul> <li>Yes</li> <li>Somewhat</li> <li>No</li> <li>Don't know/Not sure</li> </ul> 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		
Q49. Q50.	<ul> <li>Yes</li> <li>Somewhat</li> <li>No</li> <li>Don't know/Not sure</li> <li>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.</li> <li>Do you have any alternative suggestions on how to address the challenge explained</li> </ul>		
	<ul> <li>Yes</li> <li>Somewhat</li> <li>No</li> <li>Don't know/Not sure</li> </ul> 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.		

	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.		
	Generally supportive, but would want to avoid the practice such as has been reported recently by some energy consumers in the UK regarding the forced installation of smart meters and the higher costs that have been imposed on customers as a result.		
Q53.	Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.		
	nge: Rural and off-grid households or communities, and those living on communal or ral land, need additional support to build their energy access, resilience and sovereignty		
capab comm	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. Support the notion of energy ownership and security for isolated communities, especially in regions where the costs of line repairs and maintenance place a large financial burden on a		
	small number of customers. Support this as an opportunity for the development of		

	additional social and iwi/Māori retailers. It helps build resilience into isolated communities in times of adverse natural/weather events that damage key infrastructure. It also has the
	potential for the creation of high-value jobs in smaller communities.
Q56.	Do you have any alternative suggestions on how to address the challenge explained
	above? If so, please share these below.
	nge: Individuals, households and whānau in energy hardship often have limited options in ing, and engaging with, an energy retailer
Strate	gy AC5: Explore ways to facilitate and support social retailing which can provide post-pay
	r to those in energy hardship with low credit scores, deliver targeted wrap-around services, rovide tailored pricing and payment plans. Options may include one or more of:
	vide support for accredited social retailers eg through an industry fund, social generation
	obligations or government funding
b. Gov	rernment contracts one or more retailer(s) to act as a social retailer
c. Gov	ernment support for community/regional integrated social generator-retailers
d. Gov	ernment support for a nationwide integrated social generator-retailer
Q57.	Do you broadly support the proposed strategy AC5?
	🔀 Yes
	Somewhat
	L_ 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.
	Commenting on hedging: We are supporting of the concept of a 'social hedge'. While there is a market for hedges,
	prices tend to be quite high and uneconomic for smaller retailers to enter into hedge
	contracts, so is a barrier to entry. 'Social hedges' are one solution to this market barrier.
	A social hedge would secure industry agreement to supply of a tranche of hedge contracts at a below market rate that social retailers could access. This would allow social retailers,
	such as Toast and Nau Mai Rā, to be sure of the price they would pay for wholesale
	electricity and pass that benefit onto low-income households. At present these social
	retailers have hedges lodged with the NZX but those agreements are time-limited and

Q60.	<ul> <li>unregulated and so could be changed at any time. That places at risk both the future viability of individual social retailers and the provision of affordable and secure energy supply to lower oncome households.</li> <li>Social hedges would only be available to vetted social retailers who would have to meet social criteria and who could demonstrate how the benefit was being passed onto vulnerable households. The larger generators could nominate a set amount of generation into a pool that would be available for the social retailers for at least 3 years.</li> <li>It's also a market solution, as it still requires the social retailer to operate a viable business model, be innovative, and held to account for their social benefit.</li> <li>Overall, we support the concept of having a small number of social retailers contracted by Government, as well as support for a network of regional social 'gentailers'. That model would include solar providers.</li> <li>An immediate role for Government could be for it to contract an energy services consultant to develop the social retailer/generator model, including the approach to hedging.</li> <li>Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.</li> </ul>	
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 reauirements in Government's Equitable Transition Strategy. Energy Strategy and Gas Transition	
costs f		
costs f	from, the transition to low emissions energy, including explicitly reflecting energy wellbeing	
costs f requir	from, the transition to low emissions energy, including explicitly reflecting energy wellbeing	
costs f requir Plan	from, the transition to low emissions energy, including explicitly reflecting energy wellbeing ements in Government's Equitable Transition Strategy, Energy Strategy and Gas Transition	
costs f requir Plan	From, the transition to low emissions energy, including explicitly reflecting energy wellbeing ements in Government's Equitable Transition Strategy, Energy Strategy and Gas Transition Do you broadly support the proposed strategy AC6?	
costs f requir Plan	From, the transition to low emissions energy, including explicitly reflecting energy wellbeing ements in Government's Equitable Transition Strategy, Energy Strategy and Gas Transition Do you broadly support the proposed strategy AC6?  Yes	
costs f requir Plan	From, the transition to low emissions energy, including explicitly reflecting energy wellbeing ements in Government's Equitable Transition Strategy, Energy Strategy and Gas Transition          Do you broadly support the proposed strategy AC6?         Yes       Somewhat	
costs f requir Plan	From, the transition to low emissions energy, including explicitly reflecting energy wellbeing ements in Government's Equitable Transition Strategy, Energy Strategy and Gas Transition          Do you broadly support the proposed strategy AC6?         Yes       Somewhat         No	

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:
FINAL Q64.	QUESTION FOR ENERGY ACCESSIBILITY AND CHOICE KETE: 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.
	Support this. Energy poverty is poverty – customers in energy hardship are likely to be experiencing multiple hardships.
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.
	nge: Low income is a major barrier for many whānau to afford the energy they need for ing in their home
	gy AF3: Ensure all fees and costs charged to energy consumers are cost-reflective and able (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.
	Support this. Customers in financial hardship should not be further penalised by higher charges for energy, metering or reconnection. Avoiding disconnection should be the responsibility of the retailer. Initiative like the Thriving Communities Partnership on Australia prevent this happening, don't place households into further financial hardship, and avoid the unnecessary and wasted costs associated with debt-recovery.
Q71.	Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.
	nge: Pre-pay accounts often impose significantly higher costs on those most in need and sconnection is hidden

create	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.	
	Strongly support this.	
Q74.	Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	
Challe	nge: Payment options may impact affordability and choice	
	gy AF5: Require retailers to include payment options that recognise the difficulty those in v 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.	
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.	
	Support this. In hard-to-reach locations (eg coastal Taitokerau) the cost of servicing lines repairs and maintenance will significantly impact the affordability and reliability of supply for households, many of whom are Māori whānau, raising issues of equity and fairness.	
Q80.	Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.	
	Community energy generators could help mitigate this risk.	
	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

82.	Do you broadly support the proposed strategy CP1?
	🔀 Yes

Somewhat

С

	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.	
	nge: The Electricity Authority's Consumer Care Guidelines (CCG) are voluntary and there is ulatory penalty for not complying	
	gy CP2: Strengthen monitoring, compliance and enforcement of the Consumer Care ines, 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	
	Νο	

	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.
	nge: Other consumer protection regimes and dispute resolution schemes may be too v as new technologies and business models emerge
	gy CP4: Expand consumer protection and existing dispute resolution schemes to cover forms of energy provider relationships taking an energy hardship lens e.g. solar power ers
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.