

# 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](mailto: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](mailto: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](http://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](mailto:energyhardshipMBIE@mbie.govt.nz)

## Submission information

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

Personal details and privacy	
<b>Q1.</b>	<b>I have read and understand the Privacy Statement above. Please tick Yes if you wish to continue*</b> [To check the boxes above: Double click on box, then select 'checked']  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No
<b>Q2.</b>	<b>What is your name?*</b> Amanda Scothern completing on behalf of Wellington Regional Healthy Housing Group (excluding Kainga Ora)
<b>Q3.</b>	<b>Do you consent to your name being published with your submission?*</b>  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No
<b>Q4.</b>	<b>What is your email address? Please note this will not be published with your submission.*</b>
<b>Q5.</b>	<b>Are you submitting as an individual or on behalf of an organisation?*</b>  <input type="checkbox"/> Individual (skip to Q8)  <input checked="" type="checkbox"/> Organisation
<b>Q6.</b>	<b>If on behalf of an organisation, we require confirmation you are authorised to make a submission on behalf of this organisation.</b>  <input checked="" type="checkbox"/> Yes, I am authorised to make a submission on behalf of my organisation
<b>Q7.</b>	<b>If you are submitting on behalf of an organisation, what is your organisation's name? Please note this will be published with your submission.</b>
<b>Q8.</b>	<b>If you are submitting on behalf of an organisation, which of these best describes your organisation? Please tick one.</b>  <input type="checkbox"/> Iwi, hapū or Māori organisation  <input type="checkbox"/> Energy retailer  <input type="checkbox"/> Energy regulator  <input type="checkbox"/> Energy distributor  <input type="checkbox"/> Registered charity

- Non-governmental organisation
- Local Government
- Central Government
- Academic/Research
- Other. Please describe: cross-sectoral Collective Impact initiative

**Q9. I would like my submission or parts of my submission to be kept confidential.\***

- Yes
- No

**Q10. If you answered yes to Q9 above, please provide your reasons and grounds under [section 9 of the Official Information Act](#) that you believe apply, for consideration by MBIE.**

**Q11. If you answered yes to Q9 above, please confirm you will provide publishable versions of your submission in both Word and in PDF by emailing them to the MBIE secretariat at [energyhardshipMBIE@mbie.govt.nz](mailto:energyhardshipMBIE@mbie.govt.nz) - clearly labelling both "for publication"**

- Yes
- No

## Responses to questions

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

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

- HEALTH OF THE HOME KETE
- KNOWLEDGE NAVIGATION KETE
- ENERGY ACCESSIBILITY AND CHOICE KETE
- ENERGY AFFORDABILITY KETE
- CONSUMER PROTECTION KETE

### HEALTH OF THE HOME KETE

Improving individual, house and whānau energy wellbeing through healthier homes

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

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

**Q13. Do you broadly support the proposed strategy HH1?**

- Yes
- Somewhat
- No
- Don't know/Not sure

**Q14. Please share your comments on the proposed strategy HH1. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.**

Measures

See below under recommendation HH2 regarding the need to support bringing all homes up to a weathertight state that is a pre-condition for insulation/heating retrofits.

In addition to this, we suggest that the types of improvements supported by WKH be expanded to include: draught-stopping, curtains, energy-efficient hot water systems, ventilation systems.

Other more substantive and permanent but also higher initial investment measures such as wall insulation and double-glazing could also be incorporated, possibly in connection

with a 'tiered' system of subsidy level as suggested below. Given that there is significant inequity in home performance across New Zealand households, that stems in large part from a long history of systemic discrimination, we believe that equity must be a central consideration in deciding where to prioritise resources.

#### Reach

The current WKH programme eligibility cut-off level in relation to income means that there remain a significant number of households that are not eligible but are not financially able to self-fund this work. We suggest that the criteria is revisited to make the support available to more households. We have noted below under 'access' that the funding level for those most in need should be 100%. We believe there is scope to consider a tiered programme where retrofit subsidy support is available to a much higher proportion of New Zealand households, but where the level of subsidy could be stepped (eg. 100% for households below the Community Services Card income level, 80% for households at the next tier, 50% for a third tier).

#### Access & Funding

WKH and it's predecessors have already demonstrated great results in beginning to raise the collective standard of New Zealand homes, and thereby improve the conditions needed for all New Zealanders to thrive. However, those in greatest need are still those least likely to benefit. Factors such as a lack of trust in government; digital divide; unwillingness to let strangers/government-associated people into their homes mean that many of those most in need are not accessing the support.

Tuanui programme in Wainuiomata and others around the country have demonstrated that one proven means of overcoming these barriers is for trusted intermediaries – eg. community-based organisations – to be resourced and supported (funding, information, receptive response when issues are raised) to help connect eligible people with the opportunity. We encourage the Expert Panel to recommend that funding of the 'pathway' for people to access the support be a priority for government consideration when considering how to extend the good work of this programme or it's successor.

The experience of the Tuanui and Warm Up Otaki programmes in connecting eligible households to WKH subsidies demonstrates that for the households currently targeted, support needs to be 100% for most – possibly all - of those on incomes as low as defined by CSC cut-off level. For these whānau the 20% top-up amount (possibly \$500-\$1000 depending on the retrofit work needed) is often just as out of reach as the full cost. See our suggestions above regarding a tiered programme, starting with 100% subsidy for those most in need.

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

We note that there are non-governmental providers who are also funding home repair work (eg. Habitat for Humanity, Ryhaven Trust), and in some cases may be better positioned to reach those who most need support. Retrofit work could be more effectively delivered if these non-governmental providers were considered together with WKH as part of a suite of delivery channels for home repairs, and resourced for this work.

*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.**

Currently the worst off homes are excluded from Warmer Kiwi Homes (WKH) support because they need repair work for weathertightness, building envelope integrity before insulation or heating can go in – eg. broken or missing windows and doors, leaking roofs, walls or floors. WKH or a linked programme should provide (100% funded) grants for this work.

Te Puni Kōkiri's Maori Home Repair programme provides a model. We note also that there are non-profit providers already doing this work on a small scale, whose impact could be increased if funding were available.

We also note that the feedback above regarding accessibility of these programmes to the most vulnerable and most in needs of the support, also applies also here.

**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.**

Data gathering is essential for government to be able to be accountable to the public on performance of this legislation – an absolute minimum should be a register/ public notification of compliance. We believe that there also needs to be independent assessment to verify compliance given most landlords are not qualified to assess this. Supporting this, there must also be real consequences for false compliance statements/ failure to comply.

We strongly emphasise that the responsibility and financial/time burden for ensuring compliance with the legislation must sit with people engaged in rental property as a business (ie. landlords and property managers) and government and not, as is largely the case in the current system, with renters and volunteers and non-government organisations who support them.

We support regular review and updating of HHS

We also emphasise that similar minimum standards – if not higher standards given the vulnerability of those involved – need to be required of emergency and temporary accommodation. We note that currently for many, these are no longer short-term living situations.

Not all landlords have easy access to the upfront capital required to fund retrofit work to meet (or preferably exceed) HHS. We suggest that in addition to looking at ways that WKH could be extended to include some support for retrofit of rental homes (see response to HH1), that the Minister for Commerce and Consumer Affairs act on recommendations to make changes to the CCCFA to exempt council Voluntary Targeted Rates (VTR) schemes. VTRs can offer low- or no-interest long-term property-tied loans for retrofit work improving the health and sustainability performance of homes, so that councils around the country can restart, or introduce such schemes. This form of financing offers features that are not available currently through private sector loans (differences are low/no interest over longer terms, and – a critical point of difference – that the loan is tied to the property rather than the individual). This makes them potentially more attractive to landlords who may envisage selling their rental property before the term of the loan is up.

*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.**

We strongly agree that it is critical to shift the burden of enforcing Healthy Homes Standards (HHS) away from tenants and volunteer organisations.

We agree that the best way to deliver better outcomes, oversight, and monitoring is through proactive enforcement of the HHS, as also mentioned above regarding strengthening of HHS.

We also recommend the implementation of a grading system to incentivise improvements beyond the minimum standard. This could be similar to the food hygiene grades for restaurants.

Local authorities should be empowered and funded to enforce the quality standard alongside their comparable duties for new-build housing (building consents), commercial property (building WOFs and earthquake-prone buildings) and other public health matters (food hygiene, sanitation).

**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.**

We suggest that this approach to encourage and enable transition to more energy efficient appliances should not be limited to people eligible for benefits (ie. on the very lowest incomes). We made the point in our feedback to HH1 above that there are many households in financial hardship who do not fall under the current very low income cut-

off level for CSC and benefit eligibility. These households can also benefit from subsidies to make energy efficient appliances more accessible.

We suggest that a tax on inefficient products across the board, in combination with subsidies for efficient products available to those on lower incomes could effectively incentivise energy efficiency for all. A tax would have the added advantage of raising revenue for government that could be applied to expand the reach of subsidies.

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

**FINAL QUESTION FOR HEALTH OF THE HOME:**

**Q27. Are there any other key challenges and/or corresponding solutions relating to the HEALTH OF THE HOME KETE that we have missed? If so, please outline these below.**

## **KNOWLEDGE AND NAVIGATION KETE**

Supporting and empowering whānau energy decisions

*Challenge: Stronger coordination and collaboration across providers of energy hardship programmes and support services is needed to improve effectiveness and coverage*

*Strategy KN1: Establish and fund a nation-wide “energy wellbeing sector network” to facilitate and support enhanced service integration and collaboration between local organisations and establish co-networks for Māori and Pacific practitioners*

**Q28. Do you broadly support the proposed strategy KN1?**

Yes

Somewhat

No

Don't know/Not sure

**Q29. Please share your comments on the proposed strategy KN1. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.**

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

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

*Strategy KN2: Strengthen and deliver energy wellbeing 'navigator' training (such as Home Performance Advisor), including Māori and Pacific energy wellbeing training wananga/programmes that are grounded in Te Ao Māori and Pacific worldviews*

**Q31. Do you broadly support the proposed strategy KN2?**

- Yes
- Somewhat
- No
- Don't know/Not sure

**Q32. Please share your comments on the proposed strategy KN2. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.**

We note that in addition to Home Performance Advisor roles, a handful of councils host Eco Design Advisors. Currently however, whether a household has access to this support free of charge depends on whether they happen to fall under a council that supports this or be in an area covered by non-profit providers that offer this service. Government could fund to ensure that the same opportunity is available to every household in the country. We recognise that different ways of hosting this role will work in different places – it may work well for such a role to be hosted in council, or services could be provided under a community organisation or non-profit provider.

*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.**

noting comments on KN4 below that are also relevant here

**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.**

We have been concerned to see 'education' being offered as a solution where evidence and our experience through grassroots programmes such as Tuanui is that this often translates as 'sharing information' when the barriers for many people are not about information, but more often about the messenger, but also resources, confidence, lack of support/accompaniment to make use of that information. People who are struggling on a daily basis with the multiple stressors of poverty and systemic discrimination, rarely have the financial/time/support network resources to process this 'information'. Instead of adding one more piece to the load, measures to support changes in people's living situations need to be targeted at reducing the load.

Furthermore, as noted above (in response to HH1), with trust as a barrier for some to access government support, 'authoritative information' is not the same thing for all people – trust is fundamental to who has authority/believability. For example, information on a government-hosted website will not be a source of authoritative information for many people who most need it. Trusted organisations such as marae, community groups etc may be more effective.

*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.**

Feedback provided to KN4 above is also applicable here. Sources of evidence-based, consistent information are essential, however we caution against the idea that a 'single source' of information will be effective. We believe that experience demonstrates that consistency in information delivered across many channels is more likely to effectively reach diverse New Zealanders, and in particular those currently most likely to be excluded.

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

*Challenge: Households can face challenges in accessing and understanding bill and pricing information and options*

*Strategy KN6: Simplify energy bills and information access, improve comparability across electricity tariff structures, and improve price comparison services*

**Q41. Do you broadly support the proposed strategy KN6?**

- Yes
- Somewhat
- No
- Don't know/Not sure

**Q42. Please share your comments on the proposed strategy KN6. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.**

We note that trusted-person communication/relationships also have a role to play in this space

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

**FINAL QUESTION FOR KNOWLEDGE AND NAVIGATION KETE:**

**Q44. Are there any other key challenges and/or corresponding solutions relating to the KNOWLEDGE AND NAVIGATION KETE that we have missed? If so, please outline these below.**

**ENERGY ACCESSIBILITY AND CHOICE KETE**

Improving individual, house and whānau energy wellbeing through healthier homes

*Challenge: Credit issues can prevent individuals, households and whānau from having choice in an electricity supplier or switching suppliers*

*Strategy AC1: Develop mechanism(s) to ensure all residential consumers can obtain a post-pay electricity supply despite "adverse credit"*

**Q45. Do you broadly support the proposed strategy AC1?**

- Yes
- Somewhat
- No
- Don't know/Not sure

**Q46. Please share your comments on the proposed strategy AC1. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.**

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

*Challenge: Households struggling to pay their bills face disconnection*

*Strategy AC2: Develop mandatory rules for electricity retailers to follow before disconnecting for non-payment so that disconnection becomes the last resort, including penalties e.g. for wrongful disconnection*

**Q48. Do you broadly support the proposed strategy AC2?**

- Yes
- Somewhat

- No
- Don't know/Not sure

**Q49. Please share your comments on the proposed strategy AC2. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.**

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

*Challenge: Metering technology may constrain a household's access to energy supply and tariff choice*

*Strategy AC3: Identify and address the barriers to completing smart meter roll-out, prioritising areas of low coverage, and requests from households in energy hardship*

**Q51. Do you broadly support the proposed strategy AC3?**

- Yes
- Somewhat
- No
- Don't know/Not sure

**Q52. Please share your comments on the proposed strategy AC3. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.**

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

*Challenge: Rural and off-grid households or communities, and those living on communal or ancestral land, need additional support to build their energy access, resilience and sovereignty*

*Strategy AC4: Provide increased funding and support for community energy schemes and capability-building in rural communities to ensure rural and off-grid households and those on communal or ancestral lands (including Papakāinga) in energy hardship can access secure energy supply, linking with other energy programmes such as WKH and SEEC*

**Q54. Do you broadly support the proposed strategy AC4?**

- Yes
- Somewhat
- No
- Don't know/Not sure

**Q55. Please share your comments on the proposed strategy AC4. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.**

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

*Challenge: Individuals, households and whānau in energy hardship often have limited options in choosing, and engaging with, an energy retailer*

*Strategy AC5: Explore ways to facilitate and support social retailing which can provide post-pay supply to those in energy hardship with low credit scores, deliver targeted wrap-around services, and provide tailored pricing and payment plans. Options may include one or more of:*

- a. Provide support for accredited social retailers eg through an industry fund, social generation hedge obligations or government funding*
- b. Government contracts one or more retailer(s) to act as a social retailer*
- c. Government support for community/regional integrated social generator-retailers*
- d. Government support for a nationwide integrated social generator-retailer*

**Q57. Do you broadly support the proposed strategy AC5?**

- Yes
- Somewhat
- No
- Don't know/Not sure

**Q58. Please share your comments on the proposed strategy AC5. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.**



**Q59.** Please share your comments on each of the social retailing options listed above. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with these options.

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

*Challenge: The energy transition presents new opportunities but risks leaving lower-socio-economic whānau behind*

*Strategy AC6: Ensure those in energy hardship can access the benefits of, and do not face undue costs from, the transition to low emissions energy, including explicitly reflecting energy wellbeing requirements in Government's Equitable Transition Strategy, Energy Strategy and Gas Transition Plan*

**Q61.** Do you broadly support the proposed strategy AC6?

Yes

Somewhat

No

Don't know/Not sure

**Q62.** Please share your comments on the proposed strategy AC6. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.

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

**FINAL QUESTION FOR ENERGY ACCESSIBILITY AND CHOICE KETE:**

**Q64.** Are there any other key challenges and/or corresponding solutions relating to the ENERGY ACCESSIBILITY AND CHOICE KETE that we have missed? If so, please outline these below.

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.**

*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.**

**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.**

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

*Challenge: There is a lack of reporting and monitoring of key energy hardship information from electricity retailers*

*Strategy CP3: Require electricity retailers to report key energy hardship indicators to the Electricity Authority for it to monitor and publish (e.g. number of customers refused supply, disconnection numbers/durations/reasons, customer debt levels, bonds, pre-pay, referrals to Income Support, retailers' alignment with Consumer Care Guidelines)*

**Q87. Do you broadly support the proposed strategy CP3?**

Yes

Somewhat

No

Don't know/Not sure

**Q88. Please share your comments on the proposed strategy CP3. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.**

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

*Challenge: Other consumer protection regimes and dispute resolution schemes may be too narrow as new technologies and business models emerge*

*Strategy CP4: Expand consumer protection and existing dispute resolution schemes to cover other forms of energy provider relationships taking an energy hardship lens e.g. solar power providers*

**Q90. Do you broadly support the proposed strategy CP4?**

Yes

Somewhat

No

Don't know/Not sure

**Q91. Please share your comments on the proposed strategy CP4. For example, you could include your thoughts on any benefits, costs, risks, limitations associated with this strategy.**

**Q92. Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.**

**FINAL QUESTION FOR THE CONSUMER PROTECTION KETE:**

**Q93. Are there any other key challenges and/or corresponding solutions relating to the CONSUMER PROTECTION KETE that we have missed? If so, please outline these below.**

## **SUPPORTING ENVIRONMENT AND ANY FURTHER COMMENTS**

*The Panel has identified a number of supporting or enabling elements it considers are important for the landscape surrounding energy hardship initiatives, to ensure the proposed strategies can be implemented effectively and in a long-term sustainable manner.*

*These include:*

- *Data and insights*
- *Learning environment*
- *Leadership and coordination*
- *Participatory approach*
- *Collaborative service models*
- *Durable funding environment*
- *Targeting of solutions*

*Please see the Supporting Environment section of the Discussion Paper for more information.*

**Q95. Do you have any comments on the Supporting Environment section? Please share these below.**

### **Data**

We support all of these as essential elements however, we believe that the role of data goes beyond 'enabling'. Quality and relevant data is a fundamental and primary requirement in order to effectively address energy hardship in Aotearoa New Zealand. It must be the right data for the job, and resourcing must ensure that it is regularly gathered, of a high quality, and available for those who need to use it – including for government to both inform, and be accountable to the public for, policy and policy implementation. As noted above, we see that this is a significant gap in relation to compliance monitoring of Healthy Homes Standards.

There is also currently a need to improve the reliable regular gathering of independently assessed data on indicators of home performance for energy wellbeing and home health. We are aware that BRANZ have noted in their submission to this consultation relevant data-gathering work in the past and currently underway. We agree that the greatest value and commitment to a long-term and enduring approach to collecting robust and representative data on our housing stock lies in a cross-agency collaboration. WRHHG is supportive of Building Research Association of NZ (BRANZ)-led '*Future of Housing Surveys*' project (in progress) that provides the foundation for engagement with key stakeholders, to develop a framework for such an approach. We would welcome the opportunity, with BRANZ, to further discuss this project.

### **'participatory approach'**

We would also like to make comment on the 'participatory approach' point – we believe that this needs to go further – we believe that government needs to resource solutions led by and for those systematically most vulnerable – including Kaupapa Māori solutions.

### **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.**

WRHHG commend the Expert Panel on listening to those with lived experience of energy hardship and those working closely to support them.

New Zealand Human Rights Commission in 2022 released the Framework Guidelines on the Right to a Decent Home in Aotearoa New Zealand. We note that these do not appear to be referenced in the Discussion Paper. The Framework Guidelines lay out the elements of the (universal) right to a decent home and what this looks like in Aotearoa New Zealand. We believe that this document should be considered by the panel. We are happy to further discuss the parts of this document that we believe are particularly relevant to the Energy Hardship Panel's work.

## **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.