

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.

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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.

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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?* Mary Ann Mitchell
Q3.	Do you consent to your name being published with your submission?* <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Q4.	What is your email address? Please note this will not be published with your submission.* Maryann.mitchell@flickelectric.co.nz
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. Flick Electric Limited
Q8.	If you are submitting on behalf of an organisation, which of these best describes your organisation? Please tick one. <input type="checkbox"/> Iwi, hapū or Māori organisation <input checked="" type="checkbox"/> Energy retailer <input type="checkbox"/> Energy regulator <input type="checkbox"/> Energy distributor <input type="checkbox"/> Registered charity <input type="checkbox"/> Non-governmental organisation

	<input type="checkbox"/> Local Government
	<input type="checkbox"/> Central Government
	<input type="checkbox"/> Academic/Research
	<input type="checkbox"/> Other. Please describe:
Q9.	I would like my submission or parts of my submission to be kept confidential.*
	<input type="checkbox"/> Yes
	<input checked="" type="checkbox"/> No
Q10.	If you answered yes to Q9 above, please provide your reasons and grounds under section 9 of the Official Information Act that you believe apply, for consideration by MBIE.
Q11.	If you answered yes to Q9 above, please confirm you will provide publishable versions of your submission in both Word and in PDF by emailing them to the MBIE secretariat at energyhardshipMBIE@mbie.govt.nz - clearly labelling both "for publication"
	<input type="checkbox"/> Yes
	<input type="checkbox"/> 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.

The health of people's homes is beyond the influence/remit of our business that solely focuses on retailing electricity. Further, we believe Energy Hardship is only one part of the equation and there are broader issues that lead to Poverty and Hardship in NZ.

While we agree that addressing Healthy Homes should be a focus area for this work - factors like low incomes and both physical and mental wellbeing need to be considered too.

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

Challenge: The full benefits of energy efficiency improvements cannot be accessed unless a home is weathertight and reasonable quality

Strategy HH2: Fund broader building repair and improvement work to support home retrofit programmes

Q16. Do you broadly support the proposed strategy HH2?

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

Q17. Please share your comments on the proposed strategy HH2. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.

The health of people's homes is beyond the influence/remit of our business that solely focuses on retailing electricity.

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.

The health of people's homes is beyond the influence/remit of our business that solely focuses on retailing electricity.

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.

No comment

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.

This is a no-regrets strategy.

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

FINAL QUESTION FOR HEALTH OF THE HOME:

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

KNOWLEDGE AND NAVIGATION KETE
Supporting and empowering whānau energy decisions

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

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

Q28.	Do you broadly support the proposed strategy KN1?
	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Somewhat <input type="checkbox"/> No <input type="checkbox"/> 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.
	<p>In general, Flick supports government initiatives to improve people's knowledge and understanding of electricity and home energy choices - knowledge is power.</p>
Q30.	Do you have any alternative suggestions on how to address the challenge explained above? If so, please share these below.
	<p><i>Challenge: There is a lack of widespread, easy access to trusted and informed community-based energy advisers, home assessors and service navigators</i></p> <p><i>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</i></p>
Q31.	Do you broadly support the proposed strategy KN2?
	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Somewhat <input type="checkbox"/> No <input type="checkbox"/> 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.
	<p>In general, Flick supports government initiatives to improve people's knowledge and understanding of electricity and home energy choices - knowledge is power.</p>
	<p><i>Challenge: There is a lack of widespread, easy access to trusted and informed community-based energy advisers, home assessors and service navigators</i></p> <p><i>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</i></p>
Q33.	Do you broadly support the proposed strategy KN3?
	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Somewhat <input type="checkbox"/> 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.

In general, Flick supports government initiatives to improve people's knowledge and understanding of electricity and home energy choices - knowledge is power.

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.

In general, Flick supports government initiatives to improve people's knowledge and understanding of electricity and home energy choices - knowledge is power.

From Flick's inception we have made a conscious choice to educate our customers on the workings of the Electricity Market and issues that may impact them as a final consumer of electricity. This education focus is executed through various content artefacts and channels including our Blog, Social channels and our weekly customer newsletter, #FlickLife-Friday.

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.

In general, Flick supports government initiatives to improve people's knowledge and understanding of electricity and home energy choices - knowledge is power.

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.

Transparent and consistent pricing plans across the market. We believe the current offering of retail pricing plans available to consumers in the market are complex, not easily understood and sometimes are intentionally opaque, e.g.

- Pricing of bundled offerings in the market are opaque and we believe the value these types of plans deliver to consumers in real-term savings needs to be investigated vs. standalone offerings
- Similarly, do sign-up offers which include free TVs and Appliances etc, really deliver real customer value and savings?

Flick notes that the Consumer Advocacy Council is investigating simplifying energy bills based on detailed research.

Regulation of Third-Party comparison websites. To break down the complexity of pricing plans in the market and how these are presented to consumers Flick advocates for regulation of third-party comparison websites. This is to ensure that prices are represented in a fair, reasonable, and consistent way, and that it is easily understood what consumer behaviour is required to achieve the annual savings that are represented on these websites (e.g. % of off peak use and/or % of usage during "free" periods).

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.

Flick supports banning pre-pay services to remove the harm caused by “self-disconnection”.

Flick suggests there should be better reporting on pre-pay disconnections. This would also help address recommendation AF4.

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.

A significant amount of good work resulted in the Consumer Care Guidelines which include an approach to disconnections. Flick supports making these Guidelines (in their entirety) mandatory. This would help address recommendation CP2.

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.

Metering technology may constrain a household's access to energy supply and tariff choice.

Flick supports a drive to 100% smart meter penetration. We also submitted recently to the Market Development Advisory Group that smart meter data should be used for billing customers (and not profiles). This would mean customer's actual consumption choices translate directly to the amount they pay.

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.

This is beyond Flick's activity as an electricity retailer. It is unclear if this recommendation is suggesting additional funding for local generation capacity investment to achieving "access to secure energy supply".

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.

Flick supports government funding of a specialist social retailer for people in energy hardship. A specialist social retailer will gain insights about the circumstances and drivers of energy hardship and could be proactive in improving the situation for its customers (including providing insights for future government policies to address hardship). Flick's preference is that the availability and benefits of this social retailer will be well known and individual customers would have the choice of switching to that retailer (and away from the social retailer if circumstances improve).

This appears to be an option that can be implemented quickly. The specialist social retailer could have a focus on community/regional circumstances and identify if integrated social generation and retailing could be developed for a subset of energy users.

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.

Flick will be engaging in the development of the Equitable Transition Strategy.

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

FINAL QUESTION FOR ENERGY ACCESSIBILITY AND CHOICE KETE:

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

ENERGY AFFORDABILITY KETE

Affording the energy whānau need for their wellbeing

Challenge: Low income is a major barrier for many whānau to afford the energy they need for wellbeing in their home

Strategy AF1: Prioritise lack of energy access as an emergency issue and implement nationally consistent processes and timeframes for responding to requests for assistance from customers in energy hardship/their advocate/retailer, and establish clear and direct lines of communications between MSD and those customers/their retailer/advocate

Q65. Do you broadly support the proposed strategy AF1?

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

Q66. Please share your comments on the proposed strategy AF1. For example, you could include your thoughts on any benefits, costs, risks or limitations associated with this strategy.

Flick notes the focus on low incomes – this is an issue that Flick has no influence over.

However, Flick notes the Energy Hardship Panel (EHP) sees the key drivers of affordable electricity prices as the responsibility of other agencies **“competitive and efficient energy markets underpins wider efforts to reduce energy hardship. Improving market performance and competition is the responsibility of a number of bodies”**. Flick submits the EHP has a role to hold these other agencies to account. Electricity costs for all consumers must reflect the outcome of workably competitive markets.

We support the EHP’s work and recommendations but these are, in our view, tinkering around the edges and will not deliver enduring change for consumers in energy hardship if the current poor competitive performance in the wholesale market is not addressed (resulting in an increasing number of consumers in energy hardship).

The Electricity Authority has identified in its Wholesale Market Review that there is market power in the wholesale market. But the changes we believe are necessary to address this are not being progressed.

Fundamentally, systemic change is required to level the playing field for independent retailers. This will create more competition and innovation leading to downward pressure on electricity prices for all consumers.

Changes required include splitting up the “Gentailers” in order to level the playing field. For far too long, the market has enabled dominance by a few Gentailers, who use their market power to sell electricity to independent retailers at a higher price than they do to their own retail arms. Ultimately, driving out retail competition and denying Kiwis access to fair pricing and their freedom to choose.

There is a need for more transparency on internal transfer pricing i.e. visibility on the pricing Generators sell power to their retail arm. We believe every retailer should buy off the same market creating an even playing field for all who retail electricity in NZ

Flick is a signatory to the joint submission by independent retailers and strongly support the call for the EHP to “commission an independent expert report on how the health of competition in the electricity market is impacting energy (price) affordability. While the Authority is undertaking a wholesale market review so far this has been ring-fenced from downstream impacts on retail competition, and there has only been cursory consideration of what record high incumbent gentailer profits say or mean about competition and energy affordability”.

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.

We are supportive of the Winter Energy payment but believe that this scheme needs to be applied in a more targeted way to reach those in NZ who would benefit most. Specifically, a blanket payment to those 65 and over is untargeted and does not take into account financial need within this segment.

Other proposals in this recommendation relate to the welfare system that we are not qualified to comment on.

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.

More rigor is required on late payment fees across the industry. Flick supports regulating late payment fees; currently these are set at the discretion of each electricity retailer. Our belief is that these should be charged at a capped flat dollar fee which is fairer than a percentage of total bill charge applied by some retailers. The policy that regulates late payment fees outlines that a retailer can charge a fee that is "reasonable" - what is "reasonable" based on? Is 'reasonableness' assessed against a customer that is in Energy Hardship or is this based on the average NZ power consumer?

Consistency on the application of exit fees. In a similar vein Flick believes that there needs to be regulation on exit fees that are charged by retailers when customers break fixed-contract lengths. The exit fee rates that are charged are at the discretion of each retailer leading to significant variances in what charges consumers.

Prompt payment discounts banned. The removal of prompt payment discounts needs to be mandatory. This is a cost imposed only on customers that are not able to pay by the due date. Despite the EPR report in 2019 recommending the removal of these, it has not

been mandated which means some retailers continue to offer these, thus penalising those customers who can least afford their power bills.

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.

As discussed in answer to Q46, Flick supports banning pre-pay services to remove the harm caused by "self-disconnection".

Flick suggests there should be better reporting on pre-pay disconnections.

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.

The Consumer Care Guidelines include a requirement for retailers to discuss payment options with customers that are struggling to pay their bills. As discussed above Flick supports mandating the Consumer Care Guidelines in their entirety.

Electricity retailing is a competitive market. Flick believes retailers are incentivised to offer pricing plans and payment options that new customers would find attractive. For example, Flick:

- has payment arrangement options available for those customers who are unable to meet the full cost of their bills in one go to avoid arrears accumulating and the customer entering a debt process
- is proud to be one of the few electricity retailers who do not charge our customers additional fees for late payments
- offers flexible billing period options i.e. weekly, fortnightly and monthly so customers can choose a period that works with their budgeting needs
- offers a Bill Smoother tool allows customers to keep their bills predictable by rounding up to an amount of their choice, and stash some cash for higher bills, for example in winter
- works closely with WINZ to help Flick customers who need additional financial assistance.

It is not appropriate to mandate particular payment options. People in energy hardship should (also) be able to choose the best payment option for their particular circumstance.

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.

This option is complicated as this requires a balance between addressing hardship and increasing tariff complexity and therefore overall costs for all consumers. Flick suggests the case for intervention in distribution pricing may be limited when compared to the other drivers of energy hardship (including overall low incomes). Other recommendations should be prioritised.

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	
<i>Challenge: The Electricity Authority's Consumer Care Guidelines (CCG) are voluntary and there is no regulatory penalty for not complying</i>	
<i>Strategy CP1: Review and strengthen the Consumer Care Guidelines including expanding to include mandatory consumer care obligations on all electricity retailers</i>	
Q82.	Do you broadly support the proposed strategy CP1?
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Somewhat <input type="checkbox"/> No <input type="checkbox"/> 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.
<p>A significant amount of good work resulted in the Consumer Care Guidelines. Flick would like to see the Customer Care Policy become mandatory and enforceable for all electricity retail participants. These should be consistent across all retailers to give consumers the same level of care irrespective of which retailer they choose to engage with for their power supply.</p> <p>This would solve for recommendations AC2, CP2 and EF1.</p>	
<i>Challenge: The Electricity Authority's Consumer Care Guidelines (CCG) are voluntary and there is no regulatory penalty for not complying</i>	
<i>Strategy CP2: Strengthen monitoring, compliance and enforcement of the Consumer Care Guidelines, including a penalty and reporting regime for non-compliance</i>	
Q84.	Do you broadly support the proposed strategy CP2?
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Somewhat <input type="checkbox"/> No <input type="checkbox"/> 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.

Codifying / mandating these instructions will make compliance and monitoring more straightforward (as there is less discretion and non-compliance is clearly a breach of the Code).

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.

Retailers are already providing the Electricity Authority with data on disconnections and bad debts. Flick suggests a detailed review be undertaken to make sure the right data is being collected to address a clear problem definition.

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.	This is complex and requires a detailed review of how other dispute resolution services (eg Small Claims Tribunal) interact with energy and hardship.
Q93.	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	
<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.	Do you have any comments on the Supporting Environment section? Please share these below.
	No comment.
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.

