

WELLINGTON REGIONAL HEALTHY HOUSING GROUP

Submission on Consumer Care Guidelines

27 November 2020

Wellington Regional Healthy Housing Group (WRHHG) is a cross-sectoral group made up of central government departments, local councils, district health boards and Regional Public Health, as well as research, social outreach, health and community organisations. Over 50 organisations are represented in our Steering Group. We operate through a collective impact model and commit to upholding Te Tiriti o Waitangi principles, working in partnership to reduce housing and housing-related health inequities.

Our Vision is that: *“Everyone in the Wellington region lives in warm, dry and safe housing by 2025”*

The submission below is in response to the draft Consumer Care Guidelines developed by the Electricity Authority (EA), to replace existing medically dependent and vulnerable consumer guidelines. Our submission highlights three key areas that we believe need further attention in order that the Consumer Care Guidelines are fit for their stated purpose.

WRHHG is very supportive of the process that the Electricity Authority (EA) has undertaken to review the MDVC Guidelines. The consultation has been robust and we commend EA for engaging with a wide range of stakeholders. Retailers provide an essential service and are thus key actors in **meeting human rights obligations** (see New Zealand Human Rights Commission: Guidelines on the Right to a Decent Home, currently at consultation draft stage). We view the recasting of the guidelines as an **opportunity to provide clear guidance to retailers to engage with vulnerable households in their provision of an essential service.** We also view the Guidelines as being **intimately connected with anticipated outcomes from the Electricity Price Review (EPR) – Energy Hardship Recommendations.**

1. WRHHG agree with widening the Guidelines to all consumers. However, **vulnerability can and should be defined.**

Relevant criteria already exist or are being developed. Programmes such as the government’s Healthy Homes Initiative and Warmer Kiwi Homes, as well as independent research studies use a clear set of guidelines to identify vulnerable households. The energy hardship definition that will be developed as a result of the EPR will likely also suffice. Alignment with these markers will enable a consistent identification of a household’s level of current or possible future vulnerability. Referral to appropriate services at time of signup or during the customer journey would then be more easily accomplished. A common measure will also allow retailers to assess their risk and responsibilities across the industry and report to EA and other bodies.

- **We recommend that a prescriptive definition be used to identify vulnerability, that aligns with existing definitions and the (forthcoming) EPR definition.**

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2. Additional guidance is needed to meet the Guidelines stated purpose, particularly early identification of vulnerable consumers and proactive measures by retailers to minimise likelihood that consumers get into debt.

While the stated Purpose of the Guidelines is to “maximise potential” and “minimise harm” the Guidelines mainly appear to give effect to assistance once retailers run a risk of an unpaid bill. The Outcomes avoid altogether the intent in the Purpose. This maintains the “ambulance at the bottom of the cliff” approach that was a weakness of the MDVC Guidelines. **Without identification and referral to assistance and organisations that can diagnose and support clients before debt issues arise, the Guidelines will fail to meet the Purpose they are written for.**

- Prescriptive and proactive suggestions for assisting clients currently appear mostly in ‘Part 6: When payment difficulties are anticipated or arise’. These should be activated much earlier in the customer journey through active identification of vulnerability – not just at the point that financial issues arise.
- We recommend that the Outcomes include a statement such as “Customers identified as being at risk of or in energy hardship are supported”
- We recommend including wording such as “retailers will be required to prove that they were proactively involved with clients identified as being at risk prior to them experiencing payment difficulties.”
- There will likely be a wide range of in-house capabilities within different retailers in terms of offering energy efficiency advice. External services may vary in quality and availability as well. In order to ensure a consistent approach we recommend that a national register of agencies be established that a retailer can refer or contract out to meet these requirements.

3. Generally the **guidance on monitoring is vague** and leaves a lot open to interpretation.

- We recommend the Authority publish an example of what-good-looks-like, or at least a minimum standard in the template format.

WRHHG welcome contact for further information in regard to the above submission. Please contact:

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