

Privacy of natural persons

Page 2: We will keep your information safe

Q1 **Yes**

Have you read and understood the Privacy Statement?

Page 3: About you

Q2

What is your name?

Sergio Tirado-Herrero

Q3

What is your email address? We may need to contact you for clarification on your submission, or regarding Official Information Act requests. Your email address will not be used for any other purpose.

Privacy of natural persons

Q4 **Organisation**

Are you submitting as an individual or on behalf of an organisation?

Q5

If on behalf of an organisation, what is its name?

Universitat Autònoma de Barcelona (UAB)

Q6 **Academic/Research**

If on behalf of an organisation, which of these best describes it?

Page 4: Proposed Definition for energy wellbeing

Q7

Agree

To what extent do you agree or disagree that the proposed definition for energy wellbeing is right for Aotearoa?

Q8

Do you have comments on why have you chosen this answer?

Seen from a European fuel/energy poverty perspective, three quick notes on the proposed definition of energy hardship: 1) it avoids the energy poor-non poor binary, which is rather problematic because it may stigmatise people in energy poverty; 2) the energy wellbeing-hardship continuum represents more adequately the various levels of deprivation in which households find themselves in; and 3) by avoiding any reference to poverty, it may disconnect energy hardship from more general income poverty and material deprivation concerns.

Q9

Agree

To what extent do you agree or disagree with the inclusions in the proposed definition?

Q10

Do you have any comments on what is included in the definition?

Again from an European perspective, it is inspiring to see how the proposed definition and discussion document incorporate Māori terms and categories. I wonder though if the domestic energy services considered (cooking, lighting, heating and washing) may be forgetting about any other functioning enabled by domestic energy in Māori communities, e.g., anything related to non-Western or traditional community or household practices.

Q11

Agree

To what extent do you agree or disagree with what is excluded by the definition?

Q12

Do you have any comments on what is excluded by the definition?

Agree to keep homelessness and transport energy as different policy and analytical categories, even if from a lived experience perspective people do not undergo these various forms of material deprivation as separate compartments. Still, there's emerging research on 'double vulnerabilities' across transport and domestic energy poverty that may be worth considering in the future policy developments in NZ: <https://www.creds.ac.uk/identifying-the-vulnerable-energy-and-transport-poverty-and-beyond/>

Q13

Do you have any further comments on the proposed definition of energy wellbeing? - Is it clear and easy to understand?- Do you think there is anything missing?- Is it relevant to you and your community?

All in all, the proposed definition and discussion document make a contribution to progress energy hardship/poverty research and policymaking not only in the specific context of NZ but also globally. Still, as any other (social science) concept, 'wellbeing' is problematic as it is deeply rooted in economic theory close to 'utility' (see for instance:). From that point of view, one may argue that it may not adequately capture non-Western notions of 'wellbeing' and the role that energy plays in all that - see Frigo and Cao (2020): <https://en.x-mol.com/paper/article/1377808494295666688> The policy debate in NZ may also benefit from looking into 'right to energy' issues that are drawing attention of energy poverty communities in Europe: <https://engager-energy-rights.eu/2021/>

Page 5: Proposed framework for energy wellbeing

Q14

Agree

To what extent do you agree or disagree that the framework represents the factors that influence energy wellbeing in Aotearoa?

Q15

Do you have comments on why have you chosen this answer?

The proposed framework successfully goes beyond Boardman's income-efficiency-price triad. See also the 6 vulnerability factors by Bouzarovski and Petrova (2015) in this paper: <https://www.research.manchester.ac.uk/portal/files/22765388/POST-PEER-REVIEW-PUBLISHERS.PDF>

Q16

Do you have any other comments on the proposed framework?You may want to consider:- The layout of the framework, and if it is easy to understand - If anything is missing, or should be added- Which factors you think are most significant in your community

I personally find 'literacy' problematic from my own experience doing research with people in energy poverty in Spain. They often are well versed in how to best use energy at home and are no more 'illiterate' than non-energy poor people. Energy providers often do a very good in making customers' life difficult when it comes to assess which is best rate/tariff/deal for them - and are very much responsible for the so-called 'energy illiteracy'. The framework is also missing the energy efficiency or energy performance of the dwelling and its appliances as a classic driving factor of energy hardship/poverty

Page 6: Proposed indicators for energy wellbeing

Q17

Agree

To what extent do you agree or disagree with the proposed indicators for energy wellbeing?

Q18

Do you have comments on why have you chosen this answer?You may want to consider: - Are the indicators comprehensive?- Are there any other indicators of energy wellbeing that should be considered?

Agree with the overall framework - see detailed comments about primary and secondary indicators below.

Page 7: Measuring energy hardship

Q19

Yes

We are proposing to use a set of primary and secondary measures for energy hardship. Do you support this proposal?

Q20

Do you have comments on why you have chosen this answer?

Yes, a 'basket' of follows international best practice (e.g. EPOV, Sareen et al. 2020; Middlemiss, 2017; Tirado Herrero, 2017). England's LILEE and LIHC single-indicator approaches narrowly define what energy hardship/poverty is.

Q21

Disagree

To what extent do you agree or disagree with the proposed primary measures?

Q22

Agree

To what extent do you agree or disagree with the potential secondary measures?

Q23

Do you have any comments on the proposed primary and secondary measures? You may want to consider:- How many primary and secondary measures you think we should consider- Which measures you think should be primary or secondary (and why)

About primary indicators:

- It misses an underspending indicator such as EPOV's M/2 (or an improved version that better captures household forced underspending on energy services)
- Having two 2M indicators may be redundant – I personally would go for a 'fixed line' indicator that allows to monitor progress on the basis of a fixed benchmark.
- The item 'Could not pay electricity, gas, rates, or water bills on time (more than once)' should be a primary indicator as it is a very direct measure of severe energy hardship.
- A reliable, secure access to the supply indicator in relation to unpaid bills, indebtedness with suppliers and (self-)disconnections is very much recommended as a primary indicator – these are often missing and obscure severe energy hardship conditions, especially in context such as NZ where prepayment meters are installed in households with a record of debt or late payment.
- Our experience with the dampness/mould indicator in Europe is that it correlates poorly with low income and other energy poverty indicators – households may report those housing issues even when they are far from being in energy poverty.

About secondary indicators:

- Energy prices for all relevant energy carriers (electricity and natural gas, but also firewood, LPG, etc) is much recommended as a secondary indicator. Energy prices are likely the most significant driving factor of energy hardship in the short-term.
 - A summertime indoor thermal comfort indicator (e.g., dwelling comfortable cool in summer) is also advised especially in the context of a changing climate.
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Q24

Do you have any comments on measuring the depth of hardship? You may want to consider: - If we should use these measurements in Aotearoa, in addition to the primary and secondary measures- Combining measures (i.e. a DEP-17 style approach) - Measuring the energy hardship gap

Agree with the concerns in the discussion document about the calculation of an 'energy hardship' gap following the UK's 'fuel poverty' gap example. An alternative may be some sort of energy inequality metric that compares a household's energy expenditure (in NZ\$) and consumption (in kWh) per person-equivalent and per sqm of dwelling against a national median or other predefined threshold. Such metric would indicate how far (above or below) a household in comparison with the national energy wellbeing benchmark.

Page 8: Data gaps and proposed way forward

Q25

Rank the following proposals in order of most important (1) to least important (4).

Further analyse any currently available data	1
Work to fill existing data gaps/limitations	3
Model required energy use for households in Aotearoa	4
Research energy hardship-related indicators	2

Q26

Do you have any suggestions for alternatives or changes to the proposed way forward? You may want to consider:- Are there gaps in the measurement we haven't identified?- Are there data sets or measures you know of that should be included?- Do you have any other suggestions for future analysis?

- Datasets on households' indebtedness to providers and (self-)disconnections seem to be missing – especially in relation to prepayment meters where specific forms of energy hardship closely related to this payment method are likely to exist (in NZ and elsewhere).

- Beyond Energy Price Reviews there seems to be no mention to datasets that allow the monitoring of retail prices of all energy carriers used by households in NZ.

Page 9: Final thoughts

Q27

Do you have anything else you would like to mention?

Lived experiencing approaches to the monitoring of energy poverty/hardship are emerging and may be worth considering – see examples from Scotland and The Netherlands:

<https://www.gov.scot/publications/research-lived-experience-fuel-poverty-scotland/pages/3/>

<https://www.tno.nl/en/about-tno/news/2020/11/energy-poverty-and-the-energy-transition/>

Thanks so much for the opportunity to contribute. Not knowing well enough the context and specifics of NZ I hope that my comments are not off the point!

Q28

Yes

Can we publish your submission on the MBIE website? If your submission contains personally identifiable information that should not be made public, please make clear what can and cannot be made public. For example, information about other people that you are sharing without their consent or information about children. Your name, and that of your organisation will be visible. Email addresses will not be visible.
