Capital & Coast
District Health Board
ŪPOKO KI TE URU HAUORA

19 October 2018

Ministry of Housing and Urban Development
C/O Ministry of Business Innovation and Employment
15 Stout Street PO Box 1473
Wellington 6140

Attention: Healthy Homes Standards Submissions

Tēnā koe

I am writing as Chair of Capital and Coast District Health Board's (CCDHB's) Health System Committee to endorse the submission prepared by Regional Public Health (RPH) responding to the consultation on proposed Healthy Homes Standards under the *Healthy Homes Guarantee Act (2017).*

The Health System Committee (HSC) is a statutory committee under the *New Zealand Public Health and Disability Act 2000* comprising both CCDHB's Community and Public Health Advisory Committee (CPHAC) and Hospital Advisory Committee (HAC). Our HSC helps ensure we apply a whole of system lens to our decision making to achieve the best health outcomes for our communities. The HSC supports CCDHB to make good choices for our investment in services with the biggest positive impacts and a strong focus on achieving equity of both access and outcome.

CCDHB plans, funds and provides health services to the 300,000 people living in the Wellington City, Porirua and parts of the Kāpiti Coast region. These services span prevention through to highly specialised hospital care and include:

- Population health services – including through RPH
- Primary care, community laboratory, pharmacy and community radiology
- Aged residential care and home support
- NGO and community provision of personal and mental health services
- medical and surgical services through our Hospital Services (HHS)
- Mental Health, Addiction and Intellectual Disability Services (MHAIDS)

While in general the CCDHB population experiences good health compared with other parts of New Zealand, we do have pockets of high health need. Some local communities are significantly affected by poverty and the related effects of poor housing quality, lack of access to secure housing and overcrowding. We know these social determinants have a significant impact on health and wellbeing and contribute to inequitable health outcomes. Disproportionately it is Māori and Pacific peoples and people living in highly deprived communities within Porirua who experience the greatest negative health and social effects from poverty and poor housing. We observe this through more hospital admissions for conditions associated with poor housing conditions (eg, respiratory illness). The case studies outlined in

the submission emphasise the very real impact that poor housing conditions have on whānau in our communities.

The Health System Committee as stewards of our local health and disability system is deeply concerned about the effects of poor housing quality on the ability for our communities to improve their health and wellbeing and for achieving equity of health outcomes. Therefore, we are highly supportive of any steps taken to improve the state of our housing stock. Implementing Healthy Homes Standards that protect the rights of families and whānau to live in warm dry homes is key to achieving this improvement. We support the proposals within the discussion document that provide the greatest assurance that this will occur.

Ngā mihi
Capital & Coast District Health Board

Dame Fran Wilde (Chair)
Health System Committee

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Regional Public Health
HAUORA Ā IWI KI TE ŪPOKO O TE IKA A MĀUI
Better health for the greater Wellington region

19 October 2018

Ministry of Housing and Urban Development
PO Box 82
Wellington 6140

Re: Consultation on Healthy Homes Standards

Tena koe

Thank you for the opportunity to make a submission on the Healthy Homes Guarantees Bill.

Regional Public Health (RPH) delivers population and personal health services in the greater Wellington region. Our geographical area of service delivery spans Hutt Valley, Capital & Coast and Wairarapa DHBs. We deliver a range of population and personal health services, aiming to improve the health of communities throughout the greater Wellington region.

In particular we focus on achieving equitable health outcomes for high needs groups such as Māori, Pacific peoples, child and youth, low income families.

We deliver a healthy housing programme (Well Homes) as part of the Ministry of Health's Rheumatic Fever Prevention Programme. The housing programme aims to reduce crowding and assist occupants with making their homes warmer (access to insulation grants and curtains) and drier (education around ventilation and how to reduce and treat mould).

As part of our work with Well Homes, our nurses and providers see many homes in disrepair. We are often seeking levers to influence landlords to improve the standard of their homes. RPH supported the call for tighter regulations around minimum standards for homes.

We would be available to speak to this submission if the opportunity is available.

The contact point for this submission is:

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Ngā mihi

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Section 1: Heating

1.1 Where in the home should landlords be required to provide heating?

Do you support option one or two for the location of heating devices that landlords must provide in rental homes? Please explain your reason.

We support option 2 – landlords should be required to provide heating in the living room and bedrooms.

We support this option for the reasons and evidence set out in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document (p.13, 14) and listed below:

Advantages of option two include:

- tenants are likely to suffer fewer health conditions associated with living in cold and damp homes resulting in reduced healthcare costs. Other potential benefits include fewer absences at work and school and crowding for long periods in a single heated space is avoided.

- it is more likely to meet the objective of a warm, dry home than option one
- tenants with access to heating in bedrooms would especially benefit, particularly children and elderly and those with disabilities or illnesses that spend a large amount of time in the bedroom

1.3 What achievable indoor temperature should heating devices be sized for?

Do you support option one or two above on whether landlords should provide heating devices that are capable of reaching 18°C or 20°C in room(s) covered by the heating standard? Please explain.

We support option 2 – heater that landlords provide must be capable of achieving an indoor temperature of at least 20°C in rooms applicable to the heating standard

We support this option for the reasons and evidence set out in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document (p.16) and listed below:

Advantages of option two include:

- the objective of warm and dry rental homes in New Zealand is more likely to be met compared to option one as room(s) applicable to the heating standard will have the ability to achieve an indoor temperature of at least 20°C
- all tenants, but particularly at-risk tenants such as the elderly, children and the ill, will benefit from having rental homes that have the ability to achieve an indoor temperature of at least 20°C in rooms covered by the heating standard compared to option one.

1.4 Should landlords only be required to provide heating devices where portable electric heaters are insufficient to achieve the required indoor temperature?

Do you support option one or two for heating devices to be provided by a landlord in a rental home?

We support option 2 – Landlords provide fixed and portable heating devices

We support this option for the reasons and evidence set out in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document (p.18) and listed below:

Advantages of this option include:

- this option is more likely to meet the objective of a warm, dry home in cases where tenants are unable to afford their own portable plug-in heater
- all tenants, including those who cannot afford to buy a portable electric heater, can still heat a room/home to the appropriate indoor temperature so would be more likely to enjoy some health benefits and reduced mortality risk from warmer homes.

1.5 Should we accept some heating devices, and not others?

Do you agree that a class of acceptable heating devices is created for those devices that are efficient, healthy and affordable for the heating standard? Please explain.

We agree that a class of acceptable heating devices is created and that these devices should be efficient, safe, healthy and affordable.

Do you agree that the heating devices listed above (unflued heaters, open fires etc) should be not acceptable for the heating standard? Please explain.

We agree that unflued gas heaters, open fires and electric heaters (except heat pumps) greater than 2.4 kilowatts) are not acceptable for the heating standard.

We agree these devices are not acceptable for the reasons and evidence set out in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document (p.19) and listed below:

- **unflued heaters (including unflued gas and kerosene heaters):** unflued gas heaters release moisture and toxic gases and are one of the most expensive heating options. If these devices were not acceptable then it may lead to tenants experiencing fewer illnesses associated with exposure to mould and pollutants

- **open fires:** open fires generally operate at approximately between 5 per cent and 15 per cent efficiency with the majority of the heat they produce escaping through the chimney. This makes them ineffective and expensive to run. They also significantly contribute to indoor and outdoor air pollution

- **all electric heaters (except for heat pumps) with a heating capacity of greater than 2.4 kilowatts:** electric heaters greater than 2.4 kilowatts would not be acceptable because they are expensive to run and reduce the likelihood of tenants using them. This would include electric night-store heaters which do not provide consistent heating capacity at all times and which provide tenants with limited control over when they heat the room

- **using multiple portable electric heaters in one room:** multiple portable plug-in heaters in one room with a combined capacity greater than 2.4 kilowatts would not be acceptable because they could overload electrical wiring and cause fire hazards and because multiple electric resistive heaters are expensive to run and reduce the likelihood of tenants using them.

The advantages of not accepting certain heating devices include:

- landlords do not incur capital costs on heating devices that are inefficient, unaffordable or unhealthy
- tenants enjoy a reduction in energy costs on their primary heating if replaced by more affordable to operate devices
- government and public benefit if less energy efficient heating is replaced by more efficient heating leading to a reduction in carbon emissions. Government and public also benefit from less demand on publicly funded services in health and other social support.

What other types of heating, if any, do you think should be acceptable or not acceptable in the heating standard? Why?

No comment

Section 2: Insulation

2.1 What minimum level of insulation should be required in rental homes?

Which of the options (one, two or three) for the minimum level of insulation required do you support? Please explain.

We support option three – an even higher minimum level of ceiling and underfloor insulation, where the minimum level for both existing and new insulation is akin to the 2008 building code.

We support this option for the reasons and evidence set out in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document (p.27) and listed below:

Advantages of option three include:

- a higher number of additional rental homes (80,000 – 190,000) will benefit from an insulated rental home compared to options one and two depending on how "reasonable condition" is assessed (see section2.2) to meet the objective for warm rental homes

- tenants in homes where insulation has been 'topped up' under this option have the potential to experience reduced costs from improved health (e.g. fewer deaths) and reduced costs from lower energy bills. A recent 2018 analysis shows specific benefit from health savings from insulation 'top ups'. Tenants may use less energy if the home is more adequately insulated resulting in lower energy bills

- landlords and government have a single standard that is clear and applies to all rental homes (including new build homes), that may reduce the likelihood of disputes and enforcement costs

- government / taxpayers benefit from homes being able to be heated more efficiently due to improved insulation leading to a reduction in carbon emissions and government / taxpayers benefit from less demand on publicly funded services in health and other social support. However, the Cost Benefit Analysis (CBA) found that the energy saving is slightly less in topping up some insulation currently at the 2001 benchmark levels.

Additionally, with greater insulation comes greater energy efficiency and lower energy bills. Keeping energy bills affordable is essential for many of the families we see through our healthy housing initiative (Well Homes).

Do you agree that the exceptions set out in the 2016 regulations should continue under the proposed insulation standard (e.g. when it is not reasonably practicable to install insulation)? Please explain.

We agree with the exceptions set out in the 2016 regulations. In addition where insulation cannot be installed because of the building's structure, the landlord should be required to install high efficiency heating in order to achieve similar indoor temperatures without substantial energy cost to the tenant.

Do you think any other requirements for insulation should be included in the standard and, if so, what?

Insulation should be installed and certified by a trained installer, to ensure fire and electrical safety requirements are met.

Would any of the above options inhibit future innovation and/or flexibility? If so, how?

No comment.

2.2 How should the degradation of insulation under "reasonable condition" be assessed?

Do you support option one or two to assess a "reasonable condition" for insulation? Please explain.

We support option two – insulation can settle or degrade by up to and around 10% before it is in an unreasonable condition.

We support this option for the reasons and evidence set out in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document (p.30) and listed below:

Advantages of option two <u>over and above option one</u> include:

- this option is likely to better help meet the objective to make rental homes warm and dry than option one, by ensuring existing ceiling and underfloor insulation, as installed, is reasonably effective and that ceiling insulation has not compressed or settled significantly
- more tenants will benefit from insulation 'top-ups', and are therefore likely to experience health and heating cost saving benefits. More tenants may use less energy
- government may benefit from a reduction in energy use in its aim to reduce carbon emissions compared to option one.

<u>Advantages of option one</u> include:

- this option is likely to help meet the objective to make rental homes warm and dry by ensuring existing ceiling and underfloor insulation, as installed, is reasonably effective, however, less so than under option two
- landlords and government have a clear guidance on the definition of the insulation condition that is easy to visually assess in rental homes. Tenants will also be able to check if the insulation in their rental homes complies and, if required, can raise any issues with their landlord or the Tenancy Tribunal
- a higher allowance for ceiling insulation settlement or compression means fewer landlords will be required to top-up insulation so landlords will incur less costs.

Do you think any other criteria for interpreting “reasonable condition” of insulation should be included and, if so, what?

No comment.

2.3 How can landlords show compliance with the insulation standard?

Do you agree landlords should show compliance with the insulation standard by retaining particular records? If so, which records should be retained? Please explain.

We agree landlord should show compliance with the insulation standard by retaining particular records.

We agree with the options set out in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document (p.31) and listed below:

Options for potential records include:

- the R-value when the insulation was installed
- a record of Building Code compliance and the level of insulation
- a suitably qualified and experienced assessor has certified compliance with the insulation standard.

In addition we suggest further investigation into requiring landlords to register the location of their rental property with the local council, as is the case in Scotland[1]. The local council seems like a natural repository for building related compliance and enforcement. Having council as a repository of information could also produce more robust set of data for individual dwellings.

[1] Mygov.scot - https://www.mygov.scot/renting-your-property-out/

Section 3: Ventilation

3.1 What level of ventilation is required in rental homes?

Do you support option one, two or three to provide adequate ventilation in rental homes? Please explain.

We support option 3 – openable windows as for option 2 and appropriately sized and installed extractor fan(s) in rooms with a shower, bath or indoor cooktop.

We support this option for the reasons and evidence set out in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document (p.35, 36) and listed below:

Advantages of this option include:

- this option is more likely to achieve the objective of a warm and dry home because it addresses the need for ventilation in rooms with indoor cooktops, compared to option one and two
- mechanical ventilation in rooms with a bath, shower or indoor cooktop, if used, is likely to reduce indoor moisture vapour, damp and mould to create a drier home than options one and two
- tenants who are able to use mechanical ventilation will have a drier, less mouldy rental home and

We also support the following statement in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document (p.36)

> "There is a large body of evidence linking poor health outcomes, particularly respiratory diseases, to the presence of harmful moulds and mildews (a result of excess dampness and inadequate ventilation)[2]".

What other forms of ventilation should be considered acceptable, or not included in the standard as acceptable? Please explain.

No comment

Do you agree that exemptions should be available for certain rental homes from requiring openable windows?

No comment.

Would any of the above proposed options for ventilation prevent future innovation and / or flexibility? If yes, how?

No comment.

[2] Heseltine, E., & Rosen, J. (2009). WHO guidelines for indoor air quality: dampness and mould. WHO Regional Office Europe

Section 4: Moisture ingress and drainage

4.1 How should landlords protect rental homes against moisture entering the home and inadequate drainage?

Do you support option one or two above to address the problems identified with moisture ingress and inadequate drainage in New Zealand rental homes? Why/Why not?

We support option two – landlords must ensure efficient drainage and guttering, downpipes and drains at their rental home and ensure the subfloor has a ground moisture barrier, unless there is already adequate subfloor ventilation.

We support option two for the reasons and evidence set out in the Ministry of Housing and Urban Development Healthy Homes Standards document (p.41) and listed below:

Advantages of this option include:

- the objective to have drier New Zealand rental homes is more likely to be met than the status quo, homes will be less mouldy with less moisture damage. BRANZ research has found ground moisture barriers to be the most effective option at addressing subfloor moisture (more effective than subfloor vents)

- landlords may incur lower maintenance costs because of a drier subfloor space with reduced decay of the floor structure and underfloor insulation

- tenants are likely to benefit from a drier, less damp and mouldy home. A drier, less mouldy home could lead to fewer illnesses and hospitalisations for tenants (including wheeze for children) and less damage to their property

- tenants may experience energy savings if a rental home has reduced moisture levels making it easier to heat.

We also support the evidence produced in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document highlighting the association between indoor dampness-related factors and respiratory health effects including developing or exacerbating asthma, wheeze and respiratory infections (p.38).

Do you think other requirements for moisture ingress and drainage should be included in the standard? If so, what?

No comment.

Do you agree with the proposed exemptions? Do you think there are other homes that should also be exempt?

We agree with the exemptions set out in the Ministry of Housing and Urban Development Healthy Homes Standards document (p40) and listed below:

A landlord would not need to provide a ground moisture barrier under option two if:

- the rental home has adequate (open and unblocked) subfloor ventilation openings of sufficient size and distribution around the subfloor perimeter to meet the requirements of the relevant New Zealand building standard (currently NZS 3604:2011)

- the rental home is a pole house with an open air space between the floor and the ground under the home; or

- a landlord obtains a certificate from a qualified building surveyor to show that their rental home complies with the standard.

We support the Ministry of Housing and Urban Development's intent to provide landlords and tenants with clear guidance on what, if any, work would be required to meet the standard and how to assess if their rental homes meets any exemption.

Would any of the above options inhibit future innovation and/or flexibility? How do you suggest this could be overcome?

No comment.

Section 5: Draught stopping

5.1 What is the appropriate level of draught stopping to create warm and dry rental homes?

Do you support option one or two above to stop draughts and create warm and dry rental homes? Why?

We support option two – landlords must block any unused fireplace and chimneys and stop unnecessary gaps or holes that cause noticeable draughts and a colder home, and are 3mm or greater in and around windows and doors, walls, ceilings, floors and access hatches.

We support option two for the reasons and evidence set out in the Ministry of Housing and Urban Development Healthy Homes Standards document (p.44, 45) and listed below:

Advantages of option two include:

- the objective to achieve warmer, drier rental homes is more likely to be addressed through this option, particularly in comparison to the status quo, because common sources of draughts in rental homes would need to be sealed

- tenants will live in rental homes that are less draughty than the status quo, and tenants are likely to find it easier to heat with lower energy bills and tenants may enjoy better health and other positive social outcomes

- landlords and government will have a flexible and simple standard for draught stopping to comply with. Landlords have flexibility to choose the appropriate measure for their home to stop draughts depending on its age and type

- homes that use less heating can lead to lower atmospheric carbon emissions.

Do you think other requirements for draught stopping should be included in the standard? If so, what?

We support draught stopping being included in the standards.

The Ministry of Housing and Urban Development Healthy Homes Standards discussion document points to research from the Department of Public Health at the University of Otago, Wellington. This research "on new builds indicates even minor improvements in draught stopping can improve the warmth of homes. The University of Otago's research shows minor draught stop interventions, such as additional sealing strips and fitting draught excluders to exterior doors, can increase the indoor temperature by 1-1.50 C." (p.43)

We also support the statement in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document:

"Draughts also make it harder and more expensive for tenants to heat their homes. Homes that are draughty can limit the benefits of improved insulation, heating, and ventilation" (p.43).

Would any of the above options inhibit future innovation and / or flexibility? If so, how?

No comment.

Should the regulations specify any exceptions to this standard? If so, what?

No comment.

Section 6: Date to comply with the standards

Do you support option one, two or three above for the date that landlords need to comply with the standards for their rental homes? Why/why not?

Each option presents its own unique set of challenges making it difficult to choose one option over another. We support options that would see:

- Tenants wellbeing at the centre of the decision made around dates to comply
- Some tenants benefitting from improvement as early as possible
- Industry is likely to need sufficient time to build capacity to meet demand as there will be a surge in demand close to a single deadline (as demonstrated with the RTA regulations 2016).
- High quality and safe installations completed by qualified installers.

For option one, do you think 1 July 2021 is the appropriate commencement date? Why/why not? Do you agree landlords should be given a grace period of 90 days between the start of a tenancy and when they need to comply?

See above comment.

For option two, do you think 1 July 2022 is an appropriate date to allow landlords, industry and government with sufficient time to comply with the standards? If not, which date do you think would be appropriate, and why?

See above comment.

For option three, which approach do you think is an appropriate way to stagger implementation (by standard or location)? Do you have an alternative approach to staggering implementation that you think we should consider?

See above comment.

Is there a feasible compliance date option that has not been considered? Please explain

See above comment.

General question for your feedback

Do you agree with the assumptions and analysis in the document for the indicative costs and benefits, and our analysis of the advantages and disadvantages?

We strongly agree and support the assumptions and analysis of the advantages and disadvantages listed in the Ministry of Housing and Urban Development Healthy Homes Standards discussion document.

Section 7: Implementation

7.1 Enforcing the standards

What records should a landlord retain to show compliance with each healthy home standard (e.g. R-value certification for the insulation standard)?

No comment.

What could be included on the tenancy agreement to show the landlord has complied with each healthy home standard (e.g. a description of the mechanical ventilation supplied in the kitchen and bathroom for the ventilation standard)?

No comment.

7.2 Online tool to assist landlords comply with the standards

What are the most important considerations in developing a tool to help tenants understand and landlords to comply with the heating standard?

No comment.

Appendix one – Well Homes Case Studies

These case studies from our Healthy Housing Initiative Well Homes highlight some of the issues we encounter regarding housing quality.

Case Study One

We received a referral from a Plunket nurse for a seventeen year old girl (Miss A) and her six month old baby. On visiting we found baby and mum living in a garage with their cat and dog. The property was mouldy and damp; there was no insulation, and there was evidence of water damage inside the garage from an unresolved leak. Although it was summer when we visited, Miss A needed to operate her heater 24 hours a day to keep warm. There were no smoke alarms or curtains and the baby had been hospitalised four times since birth. There were also pest issues (cockroaches, flies and spiders) and only a single power point which had multiple appliances running off it (see Fig. 1).

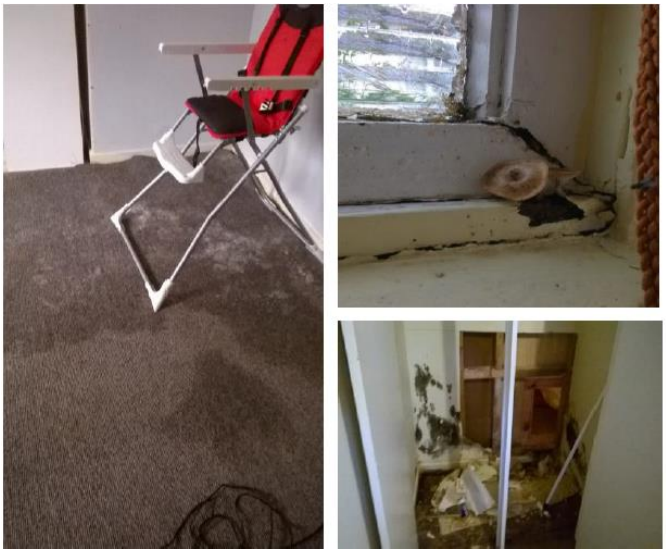

Figure 1: Pictures of wet carpet with mould growing from a leak; mushroom growing in bedroom of baby & Mum; unfinished wardrobe in the bedroom with mould

Work and Income had paid the bond and were paying $190 a week to the private landlord for this dwelling; there were separate tenants in the front home, on the same property as this garage. The council had given consent for the garage to be used as a “poodle parlor” and were unaware it was being tenanted.

This young mum had a history of CYF care herself, a CYF notification had been made for this baby due to his father being an alleged drug dealer and concerns about family violence. At the time of visiting, mum was fairly unsupported by her own family (she had been raised by her grandmother, who was now elderly) and she was no longer in a relationship with the child’s father, however had attended parenting courses and received support from Vibe, a community organisation working with youth.

We involved the council and worked with the tenant and Community Law to take the case to the Tenancy Tribunal. As a result, the year lease was terminated and the tenant was compensated for numerous breaches. We assisted the tenant to apply for an urgent transfer into social housing and she was rehomed in a Housing New Zealand property within a matter of months. We completed a healthy homes visit at her new property and provided her with healthy housing education and support, mould cleaning pack, heater and window tape. Since this rehousing in 2015 the referred child has had no further admissions to hospital. Mum told us she was really grateful for our service and felt able to approach us for support.

Case Study Two

A referral was received from a Public Health Nurse after a primary school had reported some concerns around a family who had just moved into the area. The children were attending school without lunch, and one of the children in the family had turned up to school with a burn mark on her clothing. When questioned, the mother had informed the school that she had to dry the clothing in the oven.

The family of five were living in a three bedroom private rental property. The home had no smoke alarms, no heat source, inadequate curtaining and the family had no fridge/freezer, washing machine and very little clothing, bedding and furniture. Despite only inhabiting the home for a matter of weeks there was evidence of condensation, mould and the family ran a dehumidifier throughout the day to try to alleviate the dampness.

Dad had recently been made redundant so the family were waiting for the stand down period to end in order to get the benefit to start. As per all housing visits we provided education to the family around cleaning visible mould, ventilating the property and the importance of heating. We asked for their permission to involve some social services to assist with the level of poverty. An advocacy letter was written for the private landlord requesting he make some repairs and consider installing a heat source. These repairs were completed; however he did not install a heat source. The family was referred to the fire service for free smoke alarms, an insulation provider, curtains through the community curtain bank and through the Porirua Social Sector Trial we were able to provide the family with both a heater and some other interventions (eco light bulb, draught stopper tape, door snake and window kit).

We wrote to Work and Income requesting they support the family to obtain a washing machine and fridge/freezer for safe food storage. The mother reported that one of the school age children had incontinence issues and that they were struggling to manage this. We referred the child to the community paediatric continence nurse who further assessed the family, discussed management options and assisted with providing continence products.

As the family were new to the area they did not have a local doctor, we linked them with a local medical practice where they enrolled. Our visit was documented on the medical records of the whānau. We also kept the Public Health Nurse in the school informed so she could report back to the school and involve the school social worker to ensure the family continued to be supported.

On our final contact with the family they reported that two smoke alarms were installed, they used the draught stopper tape to reduce the draughts, and they had obtained a fridge/freezer and washing machine through assistance from WINZ. Their landlord had installed safety latches on the windows; the family had put up fencing to ensure their children were safe in the yard. The home was insulated using the EECA scheme, they hung the curtains from the curtain bank and the family trialled using the heater we provided them with, but found they were unable to afford the cost of power to heat the home on a regular basis, so used the heater on particularly cold nights when absolutely necessary.