

Consultation on Fuel Poverty Strategy

Consultation questions	Response
<p>1. Do you agree with the Government's proposal to update the fuel poverty metric to Low Income Low Energy Efficiency? If not, which metric would you prefer and why?</p>	<p>Broadly agree. Maintains the existing methodology of targeting low income and high costs, however this method is less relative, and makes it easier to measure improvements against the housing stock. We welcome the more inclusive nature of this target represented by the increase in numbers, and feel that this will reduce the number of people moving in and out of fuel poverty without a change of circumstances. It is necessary that this measure is calculated retrospectively to ensure there is appropriate benchmarking and understanding against old measure sand to ensure continuity in planning and monitoring</p> <p>We would prefer that LILEE (EPC) be used rather than using FPEER. EPC ratings are a standard measure, commonly understood within the industry and used for other grant systems and ECO, using a separate methodology would complicate targeting unnecessarily. Warm Homes Discount can be taken into account in other ways (see question 19).</p> <p>However, we would support the use of or references to the Scottish method as this based on actual cost to heat a home to an adequate level and how this compares with someone's income, rather than what EPC band the property is. Retention at least of publication of this figure to allow comparisons between nations to aid in identifying what works would be extremely beneficial.</p> <p>People can be excluded from the LIHC definition if they under-occupy a property, for example if a member of the household dies, however the house costs are the same and the income will not have risen so this does not seem reasonable.</p> <p>The 10% metric is simple to understand and can aid third sector organisations in finding people in fuel poverty. It would be useful if a local authority could use this in certain circumstances as part of the targeting methodology for Flexible ECO.</p> <p>Additionally, we believe that people should not be left behind because they live in a Band A, B or C home. They may still live in fuel poverty and as a result over time the banding of the property may worsen due to lack of ability to upkeep the property. Each metric offers a different insight into the process and impacts of fuel poverty.</p>
<p>2. The proposed metric update – LILEE – would necessitate certain updates to the current methodology, namely as regards the high costs threshold, but the other aspects of the current LIHC methodology would not necessarily need updating. Do you have views or evidence on whether Government should update those other aspects of the</p>	<p>Scotland includes childcare costs in their income calculations, which makes sense as young children are vulnerable to the effects of living in a cold home. It would be beneficial to see how this works in practice, and whether it could be added without making targeting more difficult.</p>

<p>methodology on the introduction of LILEE, including the following:</p> <ul style="list-style-type: none"> a) Household energy requirements calculation, including heating regime⁵¹ b) Equivalisation factors, for fuel costs and for income ⁵² c) Income methodology ⁵³ d) Fuel prices methodology ⁵⁴ 	
<p>3. Do you agree that Government should retain the current target and interim milestones?</p>	<p>The current target and milestones are not SMART targets as they contain the phrase “as reasonably practicable”. BEIS should estimate, or ask the Office of National Statistics, how many homes are likely to be unable to be updated i.e. listed dwellings and include a percentage based on this estimate so that it can be seen whether it has been met or not. As a result of the new national and local climate change targets for decarbonisation, it would be beneficial to move the target forward to 2025, combining it with the second milestone. In line with the proposed fourth principle of sustainability, if this change is made the PRS (MEES) Regulations should be amended to match the targets. It would also be useful to see if England could follow Scotland’s lead in introducing a new target of Band B by 2040.</p> <p>The milestones should be amended to reflect a “worst first” approach as the way they are currently written can be met by a piecemeal approach, as no end point is stated. For example the nearest milestone, to improve to Band E by 2020, can be interpreted to mean that dwellings rated F and G should be improved to Band E by 2020 and then revisited by 2025 to improve it to Band D and then revisited a third time to reach Band C by 2030. This is inefficient; it would be a far better and more cost effective approach to improve the dwelling to Band C at the first visit whenever possible. The targets should reflect the need for a whole-house approach, rather than incremental improvements. We would therefore propose that the target and milestones be amended to:</p> <p>Percentage (defined by BEIS) F and G rated fuel poor homes have been raised to Band C by 2020.</p> <p>Percentage (defined by BEIS) fuel poor homes rated E or below have been raised to Band C by 2025.</p> <p>Percentage (defined by BEIS) fuel poor homes rated D or below have been raised to at least Band C by 2030.</p> <p>This is needed to better reflect the aims of the policy and to be measurable.</p> <p>In addition, it would be useful to give the milestones the same legal footing as the target.</p>
<p>4. Do you have views or evidence on our proposal to add more detail on, and clarify, the meaning of the ‘Worst First’ principle, including the considerations raised above?</p>	<p>The revision of the milestones detailed above would add clarity to the “worst first” principle. They would give a continued reason to include all homes in schemes as they would count towards the target.</p> <p>We agree with the principle that the worst properties should be</p>

	<p>treated first. However the Government should be aware that we are often restricted in how effectively we can prioritise different properties by the cost of measures required and the available funding for them. There should be more grant funding available to make it happen to all housing tenures to ensure these works are undertaken. In particular, many of our worst properties are hard to treat and require expensive solid wall and attic room insulation – this can create a tension between cost effectiveness and worst first. Landlords will exempt themselves from undertaking the measure if the works are too expensive under the high-cost criteria.</p> <p>We also agree that a whole-house approach should be facilitated where possible. Some households will not want this as it may be regarded as too much disruption but it is a better use of time and resources than continuing to revisit the same house multiple times. We have experience of schemes involving a multiple measure approach. For example the Leeds Holbeck Scheme, helped 153 houses in a highly deprived area of Leeds, which were overwhelmingly privately rented. A range of funding was used: Housing Revenue Account (HRA) funding our properties to act as an anchor load, Flex ECO and HHCRO, Local Growth Fund, LCC funding and customer contributions. The houses were Victorian terraced properties average rating F/G and by delivering 559 measures to the houses were raised to a B/C. The average price for a house was £26,265; landlords paid a quarter of the cost and could see the value for money. Households managed to raise the average internal temperature of their house from 12°C to 18°C, which will have had positive benefits to their health. Households have also saved an average of £325, reducing the fuel poverty gap. The work has transformed the neighbourhood.</p> <p>Poor-condition housing represents a continuing cost and strain on the NHS. Regulations to enforce action have been introduced for the private sector, these should be strengthened and a similar principle be introduced for social housing. Owner Occupiers would need help, as well as compulsion, to meet these targets and, a range of interventions would be necessary to reflect different circumstances.</p>
<p>5. Do you have views or evidence on our proposal to add more detail on, and clarify, the meaning of the cost-effectiveness principle, including the considerations raised above?</p>	<p>We believe that the current interpretation of the cost-effectiveness principle does not work, as it has led to an over-emphasis on cavity wall and loft insulation in the past. The market for this has largely been exhausted in the core cities. There is a comparative lack of resources directed towards external wall and attic room insulation, which would help to improve some of our most inefficient housing stock in our most deprived areas. While measures may cost more, in area based schemes supported by Flex ECO, far more of the money would be spent on installation compared to lead generation and marketing, making it a more efficient use of money.</p> <p>BEIS are running a competition to fund programmes which aim to halve the cost of multiple measure retrofitting and this is where cost effectiveness should be focussed. The uplift included in Innovation ECO is to be welcomed as this may lead to more cost effective</p>

	<p>measures becoming established in the market.</p> <p>In terms of who pays, we have experience of blending funding from a range of sources, as in the Holbeck project above. The MEES Regulations should be amended so that private rented sector landlords would be required to pay £3,500 towards measures regardless of other external sources which could allow projects with blended funding to go ahead more easily.</p> <p>Energy efficiency is widely recognised as the most cost effective method of saving carbon. The definition of cost effectiveness should be include co-benefits. If schemes allow householders to increase the internal temperature of their houses and reduce damp and poor indoor air quality, this will lead to savings to the NHS and social care systems as well as increased productivity. This should be added to a carbon cost to determine the true cost effectiveness to society of achieving a measure, rather than simply working out what is cheapest on a narrow economic basis.</p>
<p>6. Do you have views or evidence on our proposal to add more detail on, and clarify, the meaning of the vulnerability principle and, in particular, on our proposed changes to the meaning of the principle?</p>	<p>We have targeted assistance towards vulnerable residents for many years, and we have based our definition of vulnerability on the Nice Guidance on Excess Winter Deaths and Illness and the Health Risks Associated with Cold Homes . This has helped us to obtain buy-in for the project from our partners in the health and social care sectors.</p> <p>We have combined this with the worst first principle as described in the Statements of Intent for the separate core cities.</p> <p>We believe the vulnerability of children through the effects of cold and unhealthy homes upon school attendance, educational attainment and life chances needs to be properly considered.</p> <p>We agree in principle with the proposal, however we have found that one of the measures most required by this client group are replacement heating when the existing heating system has broken down. As this is often a like-for-like replacement, the improvement in terms of energy efficiency is minimal.</p> <p>The vulnerability principles is also relevant to the way in which HHSRS operates. Any review of HHSRS should be tied into updating definitions and guidance around the definition of vulnerability.</p>
<p>7. Do you agree with our proposal to create a fourth principle on aligning fuel poverty strategy with current and future Government priorities? Do you have views or evidence that may be useful in creating this principle?</p>	<p>We believe that this principle is vital to create a sustainable and coherent strategy. There is a clear opportunity to integrate carbon reduction and tackling fuel poverty. Any fuel poverty strategy should work in conjunction with the Clean Growth Strategy and encouraging clean sustainable energy. The consultation however shows the difficulty with carrying this out, stating, “it is likely that we will need to stop extending the existing mains gas grid and installing fossil fuel based heating during the 2020s.” Whether we need to stop extending the mains gas grid depends on a decision on whether hydrogen will be used as a carbon free fuel. Key infrastructure decisions need to be made to determine long-term strategy, avoid lock-in for consumers and</p>

	<p>made as a matter of urgency.</p> <p>This principle should lead to a taskforce between government departments to address both policy and practical action where there are overlaps or different priorities. All relevant scrutiny committees should also cooperate to ensure progress is made and monitored.</p> <p>Evidence on the effectiveness of energy efficiency and increased warmth to save health costs need to be included in decisions on social prescribing, as there are clear links to Public Health and NHS strategies. The NICE Guidance contains full cost information to aid this. This needs to be communicated to local authorities, public health, CCG and Hospital Trusts to lead aligned action at a local level. The recently produced White Paper on action to prevent ill health does not pay enough attention to the effects of cold homes, providing evidence of a need to strengthen concern and action as well as align strategies.</p> <p>Cohesion from the government could lead to identification of joint budgets, leading to national action and potential inclusion in devolution settlements which the core cities would welcome. This principle should also be used in reverse to ensure that strategies to mitigate climate change do not further disadvantage those in fuel poverty.</p> <p>From an enforcement perspective work will also be required with first tier tribunals to show the policy direction and the necessity of moving towards alternative heat sources in order to hold convictions for.</p>
<p>8. Would you suggest any other guiding strategic principles? Do you have any other views or evidence on the guiding principles?</p>	<p>There needs to be guidance on the precedence and overlap of principles in order to ensure they are used for effective action and do not lead to unforeseen circumstances that either drive ineffective action, such as searching for a dwindling number of cavities, or forestall action, such as an avoidance of carrying out solid wall insulation as it is perceived to be expensive.</p> <p>Targets also need to keep pace with building standards for new build and what is technically feasible for retrofit, to provide an overall housing strategy. A pathway to zero carbon homes needs to be developed.</p> <p>A fuel poverty strategy needs to be co-ordinated with a wider energy efficiency principle for hard to treat homes in line with the original aims of CERO. In ECO1, this could be combined with HHCR0 to target subsidy at those least able to afford expensive measures. Low cost long term finance also needs to be developed, possibly in the form of an equity loan.</p> <p>The strategy should also keep in mind the future of residential load shifting and demand response opportunities. How will it ensure consumers are protected in this market place but additionally, that those most in need can participate?</p>
<p>9. Keeping in mind the strategy's</p>	<p>We believe, alongside the NEA, and in line with the other nations, the</p>

<p>guiding principles, what policies might be included in a policy plan to improve energy efficiency for households in fuel poverty?</p>	<p>need for a UK (sufficiently) funded programme of locally-led, area-based energy efficiency schemes. This should be alongside nationally available ‘safety net’ grants for households who miss out on, or cannot wait for, area-based schemes to reach them is required. The core cities are in a good position to deliver them. Local authorities have both the knowledge of a local area and the trust of the public, and therefore are in a position to deliver schemes using this funding. Area based schemes are the most cost effective and local authorities have a key role in blending funding to improve energy efficiency for all households including those in fuel poverty.</p> <p>Whilst Flexible ECO is welcomed it needs to be increased and able to be directed by local authorities, with increased discretion on how they choose to use it, alongside further grants. Guidance from BEIS needs to be less prescriptive allowing for different arrangements between local authorities and energy companies depending on local needs and priorities.</p> <p>We welcome the recent evidence of a commitment to innovation reducing the cost of energy efficiency interventions through the Whole House Retrofit and DEEP schemes, and Innovation ECO, and feel these should be continued and developed to develop cost effective interventions.</p> <p>Decisions on infrastructure need to be prioritised.</p>
<p>10. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve energy efficiency for households in fuel poverty?</p>	<p>We believe that the Government should commit to providing funding towards the installation of energy efficiency measures as part of the national infrastructure programme. This funding should be at least the £2.8bn estimated as necessary by the Committee on Fuel Poverty.</p> <p>The report “Building the Future: The economic and fiscal impacts of making homes energy efficient” produced by Cambridge Econometrics and Verco, noted an ambitious energy efficiency programme can:</p> <ul style="list-style-type: none"> • return £3 to the economy per £1 invested by central government; • save domestic consumers over £8 billion per annum in total energy bill savings; • increase relative GDP by 0.6% by 2030; • increase employment by up to 108,000 net jobs; and help reduce carbon dioxide emissions by 23.6MtCO₂ per annum by 2030. <p>Within ECO there should be an uplift for external wall insulation, and the solid wall minimum should be raised to allow this.</p> <p>Additionally, we believe there should be better publicity of the legislation for MEES and targets for improvements by 2020. This would help raise awareness for both landlords and tenants who are affected low EPC rated properties. It would be helpful if there was more publicity on the implications for private landlords who do not make the necessary improvements and the threat to their income if they have properties that are no longer permitted to rent out if they are not rated E or above by 2020.</p>

<p>11. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to improve partnership and learning on fuel poverty?</p>	<p>The role of energy networks and how they can provide pay to save funds, from avoided network costs, to energy efficiency schemes should be formalised by OFGEM and centrally coordinated at a national level.</p> <p>The core cities have effective local partnerships between local government departments, neighbouring local authorities, the energy sector, health sector, charities and academics which support localised action to tackling fuel poverty. For example, Nottingham City's Domestic Energy Efficiency and Fuel Poverty group has the knowledge and frontline experiences to enable tailored localised action when funding arises.</p> <p>The DWP should prioritise suppliers working with people in fuel debt to maximise the benefits that people receive as under claiming of benefits is endemic.</p> <p>The Digital Economy Act was introduced to aid the sharing of data, to better target people for help and improve scheme design. The core cities would be willing to work with the departments of Health, Work and Pensions, BEIS local and DNOs to see how this could work in practice, combining different measures of vulnerability, income and building related data to build better targeted more cost effective schemes. This then may lead to changes to the way data is shared and controlled before it can be fully utilised, as currently linking health and project data is very difficult.</p> <p>Additionally, there should be partnerships to ensure a lack of digital skills does not become a barrier to accessing cheaper energy.</p>
<p>12. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve partnership and learning on fuel poverty?</p>	<p>Carry on working with the core cities and other local authorities to develop place-based solutions to fuel poverty. Examine local fuel poverty strategies to identify shared challenges and priorities.</p> <p>New partnerships to develop cost effective social prescribing between CCGs and local authorities should be encouraged and facilitated by the DoH.</p> <p>DWP should make a commitment to raise the income of those in fuel poverty and on priority registers.</p>
<p>13. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to improve targeting for households in fuel poverty?</p>	<p>Currently HHCRO eligibility is already stringently targeted, given that the eligibility of the qualifying benefits is extremely constrained. HHCRO benefits themselves are generally less likely to be available to low income, working age households without children, so it might be worth considering an additional criteria based on income/savings. Flexible ECO needs to be continued with a mandatory minimum of ECO delivered through this scheme, and a further increase in the maximum amount.</p> <p>We believe that whilst it is obviously desirable to target eligibility towards those most in need, there is also a trade-off between closely targeting funding and finding a critical mass of properties to support a</p>

	<p>viable scheme. We believe that whilst CSCO was an overly blunt tool for targeting spending, the Government should explicitly support some level of area-based funding linked to local authority area renewal initiatives.</p> <p>A review of EPCs to consider that they are updated free when measures are installed, or a policy related to building passports to improve the accuracy of information about the energy efficiency of existing building stock. Funding should also be available to carry out EPCs as many homeowners do not have them. The current state of information on buildings acts a barrier to effective targeting.</p> <p>See section 11 for comments related to the Digital Economy Act.</p>
<p>14. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve targeting for households in fuel poverty?</p>	<p>We believe that the Government should commit to loosening the flexible eligibility guidance to allow local authorities more freedom to direct funding towards local fuel poverty schemes.</p> <p>We believe that the Government should commit to enabling an element of area-based funding to facilitate local authority projects in areas of high deprivation and low energy efficiency.</p> <p>We believe that the government should commit to improving information on current housing stock, including publication of the latest EPC data, and the cost effectiveness of energy efficiency to provide a business case for action. There also continues to remain a lack of awareness of the importance of energy efficiency among the public.</p>
<p>15. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to support households in fuel poverty in high cost homes?</p>	<p>A decision is required over whether hydrogen or electricity will be the main replacement for mains gas for heating. This will affect strategies for houses who currently have inefficient electric heating which needs replacement. Following on from this decision a revised form of the current Warm Homes Fund should continue past 2020.</p> <p>We welcome the recent evidence of a commitment to innovation reducing the cost of energy efficiency interventions through the Energy Accelerator and Innovate UK schemes on renewable energy generation, storage and their effect on the electricity grid, and Innovation ECO, and feel these should be continued and developed to allow cost effective and fair interventions.</p> <p>Additionally, we believe there should be policy to protect households lacking digital skills and/or resources to buy in to new smart technologies that would help access cheaper energy prices (e.g. dynamic pricing tariffs). We could end up further exacerbating fuel poverty if certain groups are excluded from particular tariffs.</p> <p>A policy review on HMOs which will allow such tenants to claim ECO or a landlord to claim ECO on behalf of all their tenants in a property is required.</p> <p>A large number of our hard to treat homes are privately rented, and we</p>

	<p>believe that these could be strengthened to encourage landlords to engage with local EWI schemes for example. We strongly believe that grant funding should be excluded from the capped amount that landlords have to pay in order to meet their obligations under the private rented sector regulations. The present system not only disincentivises expenditure by landlords on their properties, it also disincentivises local authorities from putting together offers and schemes that are attractive to the private rented sector. Whereas ECO and landlord contributions together provide a more attractive offer for top up funding, particularly at scale which would deliver value for money.</p>
<p>16. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to support households in fuel poverty in high cost homes?</p>	<p>A commitment to retain RHI, and to allow it to be additional to ECO to allow those in fuel poverty access to heating technologies that are not fossil fuel based.</p> <p>A continued commitment to district heating for those –properties such as multi-storey flats which are not suitable for gas heating or other solutions.</p> <p>Retention of the commitment to delivery in rural areas through to 2025 in line with current ECO commitments.</p> <p>The introduction of SEG following the removal of FITS should be monitored to ensure it does not have a negative effect on those in high cost homes and SEG should be modified if this is the case.</p> <p>Within ECO there should be an uplift for external wall insulation, and the solid wall minima should be raised to allow this.</p>
<p>17. Keeping in mind the strategy’s guiding principles, what policies might be included in a policy plan to improve support for low income households who are most at risk for adverse health outcomes from living in a cold home?</p>	<p>Working with the Department of Health and Clinical Commissioning Groups a policy on when social prescribing of energy efficiency measures is appropriate and would benefit the health budget. A simple signposting system to allow GPs and hospital discharge teams to refer cases to local authorities or third sector partners to receive help.</p> <p>Co-ordination between ECO and DFG to enable help to be received as quickly and cheaply as possible. Including funding available to help with (relatively low) repair costs rather than a push to replacement.</p> <p>We also believe the vulnerability of children through the effect of cold related illnesses upon school attendance, educational attainment and lifelong impacts needs to be addressed.</p>
<p>18. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve support for low income households who are most at risk for adverse health outcomes from living in a cold home?</p>	<p>Investigate whether BEIS can work with the NHS forecast unit to improve Cold Weather payments to ensure that those who can receive them, are certain they will get them and will therefore heat their homes properly during cold spells.</p> <p>Inclusion of repair and replacement of boilers as an emergency measure for those in fuel poverty with cold related illnesses.</p>
<p>19. Keeping in mind the strategy’s guiding principles, what policies</p>	<p>The various price caps imposed in recent years have certainly helped alleviate fuel poverty somewhat, which has been welcomed, especially</p>

<p>might be included in a policy plan to decrease the financial burden of energy bills for households in fuel poverty?</p>	<p>in the prepayment market. However, there is often frustration that whilst suppliers routinely penalise customers with elevated prices when wholesale costs are elevated, they rarely pass on the benefit when wholesale costs drop, as has been the case for much of this calendar year so far. This disparity should be redressed. Better communication of the tariff cap to explain that it is a rate cap not an overall amount cap should be carried out.</p> <p>Giving people in inefficient housing a discount does not solve the problem they face and this should be the priority. Everyone who qualifies for the Warm Homes discount should qualify for energy efficiency advice and subsidy. The Warm Homes discount should be a discount on the price of fuel, with a minimum level, rather than a flat rate payment this would incentivise energy suppliers to provide energy efficiency measures to those in fuel poverty, and reduce the amount they spend on the Warm Homes Discount by doing so.</p> <p>Levying funds from energy bills to pay for the required energy efficiency is a regressive form of taxation, affecting those in fuel poverty most. The additional funding required should be raised either through general taxation or another progressive measure.</p> <p>Education on how to read an energy bill, understanding tariffs, and how to reduce energy use should be included in the school curriculum. This should include greater awareness of energy as a service.</p>
<p>20. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to decrease the financial burden of energy bills for households in fuel poverty?</p>	<p>Retain the Winter Fuel and Cold Weather payments for vulnerable households.</p> <p>We believe that Warm Homes Discount should be extended, in the coming review, to provide compulsory assistance to the non-core group of low income working age households.</p> <p>Maintaining price caps as an on-going commitment would be beneficial in terms of reducing financial burden to the fuel poor. It would also be good to see a requirement for more companies to set up funds to cover their vulnerable customers' debts, where means testing shows real hardship. Additionally support the extending provision of fuel banks that work by providing energy credit at food banks.</p> <p>The core cities make use of flexible eligibility to support households in, or at risk of fuel poverty, and work with our partners in public health, social care and the clinical commissioning groups to target support towards low income households suffering from cold related illness. We believe that the flexible eligibility is vital to enable local authorities to develop schemes and programmes to assist residents in or at risk of fuel poverty, and that this element of ECO should not in any way be diminished. We would support a strengthening of the ability of local authorities to direct funding towards fuel poverty schemes.</p> <p>Bring in the recommendations of the Green Finance Taskforce to develop non-levy funded additional measures for the able to pay.</p>

<p>21. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to create a fairer energy market for households in fuel poverty?</p>	<p>Comparison sites should show the entire market - without users having to tick special options – and regardless of whether or not certain suppliers have paid a brokerage fee. In addition, comparison sites are far too often flooded with suppliers offering multiple tariffs that look almost identical. The system is open to potential abuse from gaming the pages. Also, many companies look cheap, unit rate wise, but their tariffs are tied to ancillary services, such as boiler servicing and insurance cover, making it difficult to compare. It is not clear how well vulnerable people understand how claimed personal projections can vary with a variable tariff and so whether they are making an informed choice</p> <p>Also, it is not clear how the tariffs will change in our future energy system and how to avoid exclusion, which we currently have with those with pre-payment meters from the best tariffs.</p> <p>Further regulation needed of standard practices around the installation of PPM for gas/electric and this leading to self-disconnection, and general debt management practices – particularly around new tenancies and debt being applied to persons not responsible for it.</p>
<p>22. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to create a fairer energy market for households in fuel poverty?</p>	<p>Commitment to review comparison sites to ensure that they continue to work in the interests of all consumers and energy companies are prevented from gaming this service to appear to vulnerable customers to offer better value than they are and ensure equitability for switchers.</p>
<p>23. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to improve the evidence base on fuel poverty?</p>	<p>Core cities have a wealth of experience working in partnerships with other agencies, delivering projects and working with people in fuel poverty, BEIS should work with the core cities to learn from this experience.</p> <p>Properties where interventions do not take the household out of fuel poverty but lessen the fuel poverty gap should be explored, both in terms of what further measures would be required to take them out of fuel poverty and what effect in terms of health and vulnerability lessening the fuel poverty gap has.</p>
<p>24. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve the evidence base on fuel poverty?</p>	<p>Work with smart meter information centre to enable people within energy efficiency schemes to share their energy data to allow a more thorough evaluation of the effectiveness of interventions and the energy savings actually made by people.</p> <p>Provide more information about the health benefits of these schemes to people planning projects.</p>
<p>25. Are existing arrangements sufficient to meet our commitments to review and scrutinise Government action on fuel poverty?</p>	<p>We believe that it is important that BEIS continues to report national and sub-regional fuel poverty statistics.</p> <p>With the strategy in place key policies and an action plan should be developed. This action plan can then be scrutinised to ensure that these actions are being taken and are having an effect.</p> <p>If the suggestion for a joint taskforce and joint scrutiny in section 11 on</p>

	<p>partnership and learning were taken up this would improve scrutiny.</p> <p>We believe that the Government should continue to monitor the scorecard of key fuel poverty indicators outlined in the 2015 strategy as a way of monitoring all aspects of fuel poverty progress.</p> <p>The annual fuel poverty debate is often poorly attended. If the debate were more focussed on action and changes to policy there would be more point in attending and so attendance might increase.</p>
<p>26. Do you have any further views or evidence on how the 2015 fuel poverty strategy should be updated?</p>	<p>Whilst core cities retain a number of active officers, due to budget cuts, many smaller local authorities have a lack of specialist officers who often have several roles. If the strategy is to lead to area-based action which is most cost effective, this needs to be addressed. If not, action to address fuel poverty will be centralised in the larger cities, leaving a large section of the fuel poor behind, meaning that improvement targets will not be met. Revamping the Home Energy Conservation Act to include a duty to take practical action alongside dedicated funding for these actions could help to address this. Capacity within local authorities in England and Wales should also be developed to replicate good practices to enforce conditions in the private rented sector. This should include consideration of a nationwide landlord register so properties can be systematically identified.</p> <p>There is a need for greater joined up thinking around PRS. Require acknowledgment and reference within policy of how energy requirements in the PRS relate to enforcement capabilities. Remains a lack of public awareness, including landlords that energy efficiency is enforceable.</p> <p>The importance of behaviour change, when a property is insulated, and / or better heated should be included in all actions to address fuel poverty.</p> <p>The impact on health and excess winter mortality needs to be explained to the general public.</p>