

1. The types of projects Question

1. Do you consider the funding split between the Main Fund, Innovation Fund and Decarbonisation Fund to be appropriate?

Yes, we consider the current split to be appropriate but only where if the eligibility criteria are broadened. The most innovative organisations acting in the space (the community energy sector) is excluded from all funds.

We would also recommend relaxing the criteria of the Innovation fund; it is too focused on products/services and ignores social innovation and enabling the kinds of attitude change necessary to adapt to a low carbon future.

Question 2. Do you consider the proportionate funding split between vulnerable consumers and all energy consumers to be appropriate? i.e. 70% to vulnerable consumers and a total of 30% to all energy consumers.

Vulnerable communities should continue to be the priority with a minimum of 70 % of the funding ring-fenced to support vulnerable groups. The impact of the pandemic is evident in the sharp increase in demand for our services and in the increased vulnerability of our client group. When the furlough and other schemes end, we fear that the demand for support will exceed our ability to do so.

Question 3. Should a fuel voucher fund remain a permanent feature of the overall Energy Redress Scheme, so that it can react quickly to specific crises?

A separate small-scale emergency fund to provide funding for e.g., topping up and also the funding of boiler replacements would be welcome. ECHO does not cover the full cost of boiler replacement excluding any customers unable to meet the funding gap out of their own pocket. Also, we would welcome a centralised simpler funding source relief funding, due to the extremely slow turnaround times of existing schemes.

Question 4. If a fuel voucher fund is set up, what type of consumer should be eligible to apply for these vouchers? e.g. vulnerable consumers, pre-payment meter consumers.

We agree with the suggested target groups.

2. Widening the eligibility scope to other organisations

Question 5. What are your views on expanding the applicant scope beyond charities and organisations that partner with charities? If you think the scope should be expanded, do you have any suggestions for how eligibility should be defined? (e.g. what legal structures/status should qualify? Should there be other qualifying criteria?)

We believe emphatically that the eligibility for the scheme should be broadened to include Community Benefit Societies and Community Interest Companies.

There seems little justification for the exclusion of organisation. Almost all of the Community Benefit Societies and CIC's that we know who are engaged in fuel poverty alleviation work are not-for-profit and hold an asset lock and have an governance structure that ensures that all funds received from Redress would have to be spent in line with out rules and objects. Charitable registration offers little additional protection to a funder. I would however recommend that Redress scheme were restricted

to Community Benefit Societies and CIC with an asset lock, appropriate governance and objects that focus on fuel poverty alleviation or energy justice and social justice. With this constraint there is no risk of the emphasis on vulnerable people will be diluted

We believe that there are distinct advantages to or CIC's undertaking fuel poverty alleviation work and benefitting from Redress funds. Firstly, Community Benefit Societies and CiC's can subsidise grant income with financial surplus from our social business which gives them extra flexibility to go the extra mile on behalf of clients. For example, we received numerous calls in the first weeks of lockdown from clients with whom we have worked over the previous winter who were struggling with energy costs. Some calls have come from 'shielded' individuals who do not know how to top up their pre-payment meters. Other calls have come from people worried they will not be able to pay their energy bills now they are at home all the time and are using more energy. Those in the worst position are the newly vulnerable residents who have lost their livelihoods or are desperately waiting for Universal Credit to start. This includes those in precarious employment who have fallen through the gaps in available support or the low-waged whose furloughed income did not cover their living costs. They were struggling to pay for the energy services that we all rely on to cook, refrigerate food, take a hot shower, or run appliances. Many reported that they could access ingredients to cook from a food bank but that they could not top up their meter to be able to cook the ingredients. Many reported energy debts and all the concomitant impacts on mental health. Using our financial surplus from community financed solar PV scheme and funds and donations for members we were able to offer a lockdown energy advice service aimed to support South East London residents to reduce and manage their electricity and gas costs. We employed staff to do the advice and formed a team of energy advice volunteers. All our advice was by phone/whatsapp/post with all energy advisors working from home. In previous years our financial surplus and donations has enabled us to train volunteers, buy vouchers, extend our service into the spring and fund building strategic and referral relationships. Furthermore, our social business activities give financial stability backed by half a million pounds of fixed assets that a charity will never have: unlike a charity my organisation has committed to be active in the community for 20 years.

Secondly, organisations like my own (a Community Benefit Society) is deeply embedded in our community; we are governed by residents, all our staff are local residents. Our democratic structure means that the community ultimately governs our organisation. This gives us all kinds of referral relationships and connections with locally based organisations that means we are much better able to respond to the local needs of our ethnically diverse community. In sum, everyone involved in our fuel poverty alleviation work has "skin in the game". This guards against the kind of 'mission drift' that afflicts many of the large national charities involved in this work.

Our award-winning fuel poverty alleviation work is mainly grant funded through a combination of funds from the Big Energy Saving Network, Power Partners – UKPN alongside donations and fuel poverty alleviation work. For example, this year we are funded by 8 separate funders. This provides very little stability to the team and my time is invariably spent finding ways to meet complex and diverse reporting requirements of funders. Redress funding offers the only source of funding that would allow an organisation like my own to develop a long-term programme of fuel poverty alleviation.

The current allows charities to partner with other organisations like my own. Indeed, my organisation currently benefits from a small amount of funding via a Redress Scheme led by a London-wide charity. But since we were not able to lead on the bid, our participation was limited to a subsidiary role.

3. Experience of charities applying to the Energy Redress Scheme (this section is for charities which have applied to the Redress Scheme only)

Question 6. How did you find the application process?

Question 7. Did you have a good understanding of the eligibility criteria?

Question 8. Do you have any feedback on what would have made the process better?

4. Other feedback

Question 9. Should we consider any other areas regarding the Energy Redress Scheme? If so, please provide an outline explanation of your suggested area(s). If possible, please outline any associated benefits and costs with your suggestion(s).

Question 10. Do you have any other general comments or feedback you would like to provide?