

**Annex A:** Outline proposal for data capture during the smart meter rollout to inform future energy efficiency programmes.

- Citizens Advice does not know how the new UK Government will respond to the early completion of ECO obligations, or decide to deliver future energy efficiency support. However, the combination of climate, fuel poverty and energy efficiency targets suggests that there will be continued support of some kind, as we know that more is required to meet those targets.
- 2. Fuel poverty, and the ability to pay energy bills, is a function of low income and inefficient housing.
- 3. Better information on the needs of residents and on the housing stock will assist both design and delivery of future energy efficiency and fuel poverty programmes.
- 4. Responses to a recent information request show suppliers are focussing on the personal characteristics of residents rather than the impact of the property on their vulnerability.
- 5. The financial situation and physical capability of residents are already captured either directly or by proxy by the PSR and by the DWP.
- 6. Housing stock information is patchy. We understand energy performance certificates provide information on 50% of homes but there is a range of 25% 75% depending on the area, and data quality is variable.
- 7. None of the above capture tenure, which is a key measure of a household's ability to improve the efficiency of their housing (and often their appliances).
- 8. Citizens Advice therefore recommends filling these gaps in knowledge through additional data collection as part of the smart meter roll out.
  - a. Key data relevant to fuel poverty for properties without post 2012 EPCs should be collected in a defined format. This would include, for example:
    - i. type of property (terraced, semi, detached, purpose-built flat, converted flat)
    - ii. number of bedrooms
    - iii. wall type
    - iv. glazing
    - v. heating specify boiler or other heating system
    - vi. tenure
    - vii. evidence of mould outside bathrooms and kitchens

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- b. Subject to informed consent and a clearly specified use of the data
- c. For use by specified parties responsible for the delivery of programmes, where that use is to the benefit of consumers.
- d. The data collection exercise could also gather informed consent to enable matching of the data with specified and relevant personal data held by energy companies, local and/or national government.
- e. energy efficiency programme delivery bodies (whether suppliers, local authorities or another defined body) must be required to recognise data are a snapshot in time, and the household's circumstances may have changed.
- 9. To improve the effectiveness of energy efficiency programme design and delivery, Citizens Advice also recommends that Government removes the cost barrier to the use of energy performance data, and extends the level of data available to the more detailed input data. Currently there is a per record charge to Landmark to use EPC data which does not appear to be cost-reflective.
- 10. We also recommend Government (DECC and DCLG) facilitates the use of EPC data to inform the identification of vulnerability and the provision of energy efficiency advice as required by SMICOP, and to inform suppliers' Priority Services Registers, potentially through an ongoing link to the EPC rating of a property. The use of these data should still be managed to ensure they are used for the purpose of saving consumers money on their energy bills.
- 11. Citizens Advice also recommends that all energy efficiency works accredited under Government-backed programmes are lodged on the EPC database to maintain the accuracy of data. This should be possible through the lodging of a line item rather than a full assessment. At present only those funded by Green Deal finance are lodged.
- 12. There is an added benefit that such a process could remove or at least reduce the alleged gaming of rules that has taken place in the delivery of the Energy Company Obligation (ECO), particularly in the replacement of boilers.
- 13. Citizens Advice acknowledges this proposal has a cost and recommends a cost-benefit analysis is undertaken. Costs can be limited by
  - a. Use of EPC data and other data (eg the Housing Health and Safety Rating System (HHSRS)) where that is considered up-to-date. This could be flagged at the point of appointment booking, and the rating recorded on the PSR as a factor in energy affordability.
  - b. Focussing on certain areas, where households are more likely to have low incomes, poor health or disabilities (although this will potentially leave gaps in provision in future energy efficiency programmes).

Ends

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