

Introduction

The Energy Poverty Research initiative (www.energypovertyresearch.org) was founded in 2017 as a step towards establishing a cross-sector centre for knowledge exchange and excellence in research. The EPR team consists of a group of experts in aspects of fuel poverty and energy policy, ranging from large scale generation to small scale distributed generation, demand reduction, energy efficiency, and devolution; and with a particular interest in the socio-economic impacts of energy policy on fuel poor and otherwise vulnerable householders.

We have undertaken peer reviewed and internationally acknowledged research on the vulnerabilities of fuel poor households. We have examined how many households are failed through the provision of universal services developed from policy based on assumptions, evidenced from models which themselves are built on assumptions, fail to meet their needs. The development of policy based on false assumptions results in programmes that meet needs that do not exist while failing to meet those that do.

Though there is a clear correlation between household expenditure and fuel spend as evidenced by DUKES data we have clearly illustrated that this is not a universal truth and there are patterns of complexity in fuel spend patterns that are masked by population averages.

As academics and practitioners, we share the view that in an energy rich nation it is not acceptable that such a large proportion of households suffer daily the deleterious effects of energy rationing, or that they are forced to manage debts just to maintain a reasonable modern standard of living. We believe we have a duty to continually question our understanding of this modern societal inequality, and the methods and approaches we take to identifying and tackling it.

The views that follow are those of the Energy Poverty Research initiative but do not necessarily represent the those of our host organisations. Our previous consultation responses are available from our websites. A summary of the EPR team's latest work on energy poverty can be found in our recent article for Nature Energy¹.

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¹ Baker, K.J., Mould, R., & Restrict, S., 2018. Rethink fuel poverty as a complex problem. Nature Energy, 2nd July 2018. DOI: <https://doi.org/10.1038/s41560-018-0204-2>

Responses to Questions

Q1: Are there any categories that we have not captured in Table 1? We welcome views and evidence on the main causes of self-disconnection and groups of customers who are more likely to self-disconnect and experience detriment.

Yes.

This table is a simple list of very basic and, limited classifications that shows no acknowledgement of changing circumstances². We have identified hidden geographies in the spend characteristics of low-income households that means that an over simplified classification, universally applied will not take into account the geographies of fuel poverty and the needs of householders^{3,4,5,6}.

We suggest that we must acknowledge that householders and individuals face continually changing circumstances and that over simplistic categorisation may fail to recognise let alone meet their needs⁷. It is not just those households that have self-disconnected that we should be concerned with but also those that are moving towards self-disconnection and those that have come close but averted this.

1. Householders who have poor mental health or wellbeing issues may struggle to engage with suppliers, may struggle to manage their finances or may struggle with social engagement leading to social isolation. Social isolation may also arise as a product of ostracisation. In particular we found householders with poor mental health would not engage with suppliers or other phone-based service provision.
2. Students. Typically, students may move in and out of fuel poverty within the academic year. Many students take short term lets on flats with PPM and inherited debt from previous residents without knowing how to assess or deal with this situation.
3. English is not first language. This may include refugees. This is a circumstance that may change over time with appropriate support.

² Mould, R., & Baker, K.J., 2017. Documenting fuel poverty from the householders' perspective. *Energy Research and Social Science*, 31, (2017), pp.21–31.

³ Mould, R., & Baker, K.J., 2017. Uncovering hidden geographies and socio-economic influences on fuel poverty using household fuel spend data: A meso-scale study in Scotland. *Indoor and Built Environment*, 0 (0), 1-23, DOI: 10.1177/1420326X17707326.

⁴ Baker, K.J., Mould, R., & Restrict, S., 2016. *Proiseact Spéird – The Spéird Project: Understanding influences on fuel poverty in rural and island Scotland*. Final report for the Eaga Charitable Trust, November 2016.

⁵ Mould, R., 2018. *An investigation of the district heating – fuel poverty nexus*. PhD thesis, School of Engineering and the Built Environment, Glasgow Caledonian University.

⁶ Baker, K.J., & Emmanuel, R., 2014. Behind the Definition of Fuel Poverty: Understanding differences between the Fuel Spend of Rural and Urban Homes. *Queen's Political Review*, Vol. II, 2014, Issue 2, pp. 7-24.

⁷ Baker, K.J., Mould, R., & Restrict, S., 2018. Rethink fuel poverty as a complex problem. *Nature Energy*, 2nd July 2018. DOI: <https://doi.org/10.1038/s41560-018-0204-2>

4. Householders who have suffered short term but recoverable ill health. For example Head injuries.
5. Householders who suffer from long term degenerative ill health and therefore have changing needs with changing capacities where the rate of change is determined by the rate of the deterioration through ill health.

Q2: We seek views and evidence on how self-disconnection and self-rationing is being monitored for customers on traditional PPMs. We welcome views on how effective current practices are.

We are not aware of any means of monitoring self-disconnection that is publicly available through local authorities have requested such data from the suppliers. However, we do have some concerns as to how self-disconnectors and self-rationers (on all tariffs) may be identified in future, as labelling such vulnerable householders can suffer from the social stigma of being labelled as 'poor'.

In one of our previous studies we identified a number of self-rationers using their metered energy data provided by the housing association and local knowledge of the householders gathered by the support staff at the HA⁸. This non-invasive approach is more sensitive and enables more appropriate and holistic support to be targeted at these householders than, for example, a letter from a supplier identifying them as self-rationing and offering support solely for their energy bills.

Q3: We seek evidence of examples where PPM customers were at risk of self-disconnection or who self-disconnected for affordability and/or operational and/or forgetfulness reasons, the impact on these customers, and how the situation was resolved.

For householder on all tariffs, the more holistic (and tacit) knowledge gathered by the frontline local authority and housing association staff we work with enables them to identify self-rationers and self-disconnectors, and the most appropriate support solutions for them. Some of these solutions require simple payment management ones negotiated with the supplier, whereas others require alternative / more holistic interventions - e.g. where the cause relates to physical and / or mental health issues. Some of these may involve multiple agencies and take some time to resolve, e.g. arranging Power of Attorney for a carer of a householder with dementia, and so serve to highlight the need for local social / community support services to be the primary bodies for delivering support to these householders.

Q4: We seek views on what great support service looks like for customers at risk of self-disconnection or who self-disconnect. We welcome examples of supplier good practice in dealing with self-disconnection and self-rationing.

⁸ Baker, K.J., Mould, R., & Restrict, S., 2016. Proiseact Spéird – The Spéird Project: Understanding influences on fuel poverty in rural and island Scotland. Final report for the Eaga Charitable Trust, November 2016.

We have undertaken research on the needs⁹ and the current provision of energy advice¹⁰ services^{11,12}. We recognise that there is a valuable role to be played by generic energy provision offered in Scotland through the Home Energy Scotland service¹³, however this cannot engage with the most vulnerable and socially-excluded. We would suggest that great support service is characterised by:

- Community integration – to ensure trusted provider status and easy engagement options.
- Service without prejudice, offered universally to populations – service users should not feel denigrated through accessing such services.
- Local government ownership – to ensure integration into other service provision.
- Offer face to face support in the householders’ home or a place of their choosing where they feel comfortable.

Q5: We welcome views from all stakeholders on the emergency, friendly, and discretionary credit functions. How well do you think these features work?

We would simply note the successes of discretionary payment schemes operated by some local authorities and housing associations in providing immediate relief for householders suffering from the stress of not being able to meet their energy bills and / or being in debt. Although more formal evaluation is needed we are of the view that the evidence to date supports the extension of these schemes more widely.

Q6: We welcome examples of any recent good practice examples on steps taken to provide sustainable support to PPM customers who self-disconnect and/or self-ration.

Two examples of best practice identified through our work are:

- South Seeds in Glasgow, a community-based organisation serving an area of high poverty and vulnerable householders with a wide range of support needs (www.southseeds.org)¹⁴.

⁹ Atterson, B., Restricks, S., Baker, K.J., Mould, R., Stewart, F., & Melone, H., 2018. Down to the Wire: Research into support and advice services for households in Scotland reliant on electric heating. Report for the Consumer Futures Unit, Citizens Advice Scotland

¹⁰ Maiden, T., Baker, K.J., & Faulk, A., 2016. Taking the Temperature: Review of Energy Efficiency and Fuel Poverty Programmes in Scotland. Report for Citizens Advice Scotland by CAG Consultants, Glasgow Caledonian University, and the Energy Agency.

¹¹ Baker, K.J., & Stewart, F., 2017. “Warm, friendly, reliable, and do what they say they do”: An Evaluation of South Seeds’ Energy Advocacy Services. Glasgow Caledonian University & Dr Fraser Stewart, December 2017.

¹² Baker, K.J., Mould, R., Stewart, F., Restricks, S., Melone, H., & Atterson, B., 2019. Never try and face the journey alone: Exploring the face-to-face advocacy needs of fuel poor householders in the United Kingdom. Energy Research and Social Science, under review.

¹³ Baker, K.J., Emmanuel, R., & Phillipson, M., (2014). Review of the Energy Assistance Package. Report for the Scottish Government.

¹⁴ Baker, K.J., & Stewart, F., 2017. “Warm, friendly, reliable, and do what they say they do”: An Evaluation of South Seeds’ Energy Advocacy Services. Glasgow Caledonian University & Dr Fraser Stewart, December 2017.

- Families First in Renfrewshire, which takes a wider and more holistic approach to offering support to ‘just coping’ and vulnerable families¹⁵.

Q7: We welcome views on how you perceive the collaboration between stakeholders should operate and what type of organisations you believe will play a central role in this process.

See our previous answers. We are strongly of the view that the key organisations in the chain of support are those delivering frontline (face-to-face and in-home) support to householders using locally-based staff (‘trusted intermediaries’) who are able to build up a strong rapport with their clients. This is critical to identifying and supporting self-rationers and self-disconnectors, and especially those with more complex support needs. Such organisations may be local authorities, housing associations, Citizens Advice bureaux, or community-based organisations, and so any such process must primarily be designed to accommodate all of these different organisations in the central role(s).

¹⁵ Hall, S., Lowden, K., Wardle, G., Watters, N., Friel, N., Hermannsson, K., 2015 Renfrewshire Families First Evaluation. The Robert Owen Centre for Educational Change. June 2015
<http://eprints.gla.ac.uk/135792/7/135792.pdf>