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Rebecca Pickett
RIIO Price Controls, Networks
Ofgem

22 January 2021

Dear Rebecca,

We welcome the opportunity to provide feedback on the Governance for the Fuel Poor Network Extension Scheme (FPNES). We also welcome many of the revisions which are reflected in the second version of the draft governance document. The following numbers in bold relate to the paragraph numbers in the governance document and comments relate specifically to that paragraph unless otherwise stated.

2.7.a) We welcome the addition of the health eligibility criteria and note Ofgem's intention to ensure that as many households who would benefit from the FPNES are able to. Firstly, "*Personal Independent Payment (PIP)*" should be corrected to "*Personal Independence Payment (PIP)*".

Secondly, we welcome the inclusion of PIP and Disability Living Allowance (DLA). We would recommend that Attendance Allowance is also included in this list. Unless PIP or DLA is already received before reaching state pension age, it is unlikely that those of state pension age will be able to receive PIP or DLA¹. Instead, those over state pension age who may otherwise be eligible for DLA or PIP are typically eligible for Attendance Allowance. To ensure that those with health conditions aged over state pension age are not excluded from FPNES, Attendance Allowance should be included as an eligibility under 'Criterion 3'.

¹ <https://www.gov.uk/pip/eligibility>

Patron HRH The Princess Royal Acting Chief Executive Alistair Cromwell

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2.7.b) It is unclear why this paragraph specifies EPC Band D in addition to health conditions, but does not permit eligibility for properties below EPC Band D. We recommend this paragraph states that households would be eligible by the combination of the health conditions stated in addition to occupying a property with an EPC of Band D or below.

2.11. This paragraph states that *“Properties within the scope of the FPNES in-fill mechanism must be existing domestic properties of a similar build and with an EPC similar to the EPC applicable to the associated household”*. The governance document does not specify what is meant by *“a similar build and with an EPC similar”*. Ofgem should consider whether this could be open to interpretation and if prescribing what is meant would be beneficial to GDNs and their customers.

2.15. As stated in our previous response we welcome the requirement to ensure that a gas connection is the best solution for the householder/tenant. We agree that the GDN or fuel poor partner organisation should assess this, however the requirements set out under 2.15.a) and 2.15.b) do not specify the type of assessment which should be conducted or what burden of evidence is required to demonstrate that gas is the best solution. The Simple Energy Advice website and home improvements checker tool will provide options and suggested improvements. However, it may not provide the level of information required for a householder or fuel poor partner organisation to determine the best solution without further guidance and advice. Ofgem should consider specifying more detail on the requirements to assess whether gas is the best solution and how this can be demonstrated, in a way that is not burdensome on GDNs or partner organisations.

Appendix B – Partnership Approval Questions: We agree with Ofgem that the questionnaire should assess the suitability of fuel poor partner organisations. One requirement which we believe is missing is that GDNs should ensure that partner organisations have the capability to provide, or make referrals to, advice and support for income maximisation where this could lead to FPNES eligibility. Income maximisation advice is often closely linked with energy advice and



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determining eligibility for energy efficiency schemes such as those listed under paragraph 2.4. Supporting customers to ensure they are receiving all benefits they are entitled to, where this would provide eligibility under paragraphs 2.4. - 2.7 would therefore ensure no customers who could benefit from FPNES experiences avoidable barriers to accessing it. It is therefore crucial that GDNs are assured by partner organisations that this could be provided. As an example, up to 1.2million households who are entitled to receive Pension Credit do not claim it despite it being the main means-tested benefit for those of state pension age, as well as providing entitlement to other forms of support². Where such a customer is identified by a fuel poor partner organisation efforts should be made to support them to make any necessary applications if this could lead to FPNES eligibility.

Yours sincerely

Sam Hughes

Policy Researcher

² <http://researchbriefings.files.parliament.uk/documents/CBP-8135/CBP-8135.pdf>

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