



## *Action for Warm Homes*

Northern Ireland

**National Energy Action Northern Ireland response  
on The Consumer Council's Draft Forward Work  
Programme 2018/2019**

**February 2018**

National Energy Action Northern Ireland (NEA NI), the leading national fuel poverty charity, works to ensure energy is affordable for disadvantaged energy consumers.

The latest House Condition Survey showed that in 2011, 42 per cent of all households in Northern Ireland were in fuel poverty. This is one of the highest rates in Northern Europe and is significantly higher than England, Scotland and Wales.

Improved insulation and heating standards are seen as the most rational and sustainable means of ensuring affordable warmth. Poor housing standards are responsible for the impaired physical and psychological health of millions of UK households. The links between low indoor temperature and poor health have been well understood for many years. Cold homes increase the likelihood, repetition and the severity of respiratory and cardiovascular illnesses. The links between dampness and mould growth on asthma and allergies are also well known and understood. There is also some evidence that a cold home impacts on poor mental health, low self-esteem, educational performance and social isolation.

With these aspects in mind NEA campaigns to ensure that every available opportunity is taken to highlight the causes and consequences of fuel poverty and solutions offered as to how we can mitigate and eventually eradicate the problem.

We also work with others to help us realise our ambition to eradicate fuel poverty and The Consumer Council Northern Ireland is a vital organisation within this link. To that end we welcome the opportunity to respond to the The Consumer Council's Draft Forward Work Programme 2018/2019.

The Consumer Council in Northern Ireland meets a key need and provides vital advocacy for all consumers in Northern Ireland. This expertise across many aspects of consumer life, in particular energy matters, is key in supporting and adding additional value to NEA's work, especially in relation to energy prices, regulation, switching and policy development which also empowers consumers and communities.

The Consumer Council's role is also crucially important for us as a strategic partner. NEA Northern Ireland works closely with The Consumer Council and enjoys an excellent

working relationship which will continue through the duration of this draft work programme. As a member of the Fuel Poverty Coalition and NEA's Energy Justice Campaign, The Consumer Council continues to support a wide range of organisations both strategically and operationally which serves to provide a voice for consumers in Northern Ireland.

We have made some comments around the five objectives in the draft work programme. We believe that the projects identified in the document are the right ones and have no objections. We have also respectfully made some suggestions as to a number of projects which we feel may enhance the Forward Work Programme 2018/19.

## **Objectives**

### **1: To Empower Consumers**

The recent campaign around switching has provided an excellent resource across Northern Ireland. By raising awareness and showing the ease of changing suppliers, this initiative is also dispelling the myth of complicated processes while creating more savvy energy consumers.

We particularly appreciate the proposed project activity *to develop advice and educational partnerships with, for example, elected representatives, regional councils etc.* which will continue to increase the consumer agenda at national and local levels. There is definitely an appetite for these partnerships therefore such a platform would further progress the communication of consumer rights.

Whilst not directly isolated to energy, we are in favour of the activity *to develop educational tools for youth/community organisations, with a targeted focus on disadvantaged/vulnerable groups.* This route will provide widespread awareness on basic entitlements and rights. We would be happy to work in partnership with The Consumer Council in respect to energy issues and value any opportunity to do so.

We are also pleased to see further activity *to increase consumers' understanding of their energy and water bills, and the measures that can be taken to reduce costs.* As we conveyed to the Utility Regulator in the 2017 consultation on bills and statements; Energy Bills an important form of communication between the supplier and the

consumer. Better engaged consumers are more likely to take an interest in their overall energy use and awareness.

We fully endorse these activities which target those most likely to benefit from the services of The Consumer Council in need of accessible impartial information.

## **2: To Represent Consumers**

Brexit will have a significant impact on many aspects of consumer needs, notably energy. We are pleased to see the emphasis on raising awareness on the concerns for NI consumers. We are also pleased to see advocacy as a major activity within the realm of energy with a specific emphasis on the vulnerable.

Price control is another key area within energy policy so we are pleased to see this as another priority activity. The impact of Brexit on the price of domestic home heating oil is another factor which may need additional oversight. We will continue to work with The Consumer Council through our Energy Justice Campaign and generic campaigning to ensure that grants and other interventions are available to assist householders to convert to natural gas or other affordable low carbon alternatives.

## **3. To Protect Consumers**

The protection of vulnerable customers is a high priority therefore it is reassuring to see the ongoing commitment to the critical care and customer care registers of consumers in vulnerable circumstances. We are also particularly pleased to see the proposed report on supplier and network obligations. This is another big issue within energy and there is a significant need for more data especially around efficient use of energy. We look forward to the findings within this piece of work. In a similar vein, we also welcome the research and awareness raising of complaints procedures.

## **4. To Understand the Needs of Future Consumers and Sustainable Consumption**

### Customer Insight

The action to include energy efficiency into The Consumer Council's Consumer Outlook Tracking survey was extremely insightful and we feel that it would be useful to re run the same questions for benchmarking and further analysis of the data. This would assist in understanding what the public feels around energy efficiency. This is particularly

prevalent in relation to vulnerable groups and future policy work. We are very interested in the correlation between pre-payment meters and disconnection.

### **5. To Provide Value for Money and Good Governance**

We believe that the customer journey mapping is a valuable activity to include and will promote a model for good practice elsewhere.

Other project areas which we believe would benefit consumers in Northern Ireland include:

- Involvement and guidance on any work around the new Fuel Poverty Strategy, which has been actioned in Programme for Government 2016. 2021;
- A commitment to energy efficiency training;
- A continued commitment from The Consumer Council to the work of the Energy Justice Campaign to protect and shape a new and improved Northern Ireland Sustainable Energy Programme (NISEP) which is targeted at the fuel poor in Northern Ireland;
- Work with NEA in 2018/19 to develop a consumer rights campaign based around NEA's National Fuel Poverty Campaigning; and
- Produce a Memorandum of Understanding (MoU) with NEA.

Once again we thank you for the opportunity to respond to you with these comments. We look forward to maintaining and sustaining our working relationship with The Consumer Council Northern Ireland now and into the future.

**Response submitted by:**

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