



30th Jan 2013

NEA has 30 years' experience and is the only UK wide fuel poverty charity. Our aim is to eradicate fuel poverty with a key aim to campaign for greater investment in energy efficiency to help the fuel poor and vulnerable. We have a successful track record in delivering projects to tackle fuel poverty, which will contribute to the successful implementation of Department for Social Development's (DSD) fuel poverty policies and programmes. We have close connectivity to the developing policies and practices underway and emerging throughout the UK, Republic of Ireland and Europe.

Our strategic goals are to influence and increase strategic action against fuel poverty, to develop and progress solutions to improve access to energy efficiency products, to provide advice and fuel poverty related services to households and to enhance knowledge and understanding of energy efficiency and fuel poverty. We operate across 4 priority areas to deliver these 3 core goals, namely campaigning and policy analysis, education and training, innovation and evaluation and engagement and delivery.

The 2011 Northern Ireland House Condition Survey indicated that a staggering 42% of all households in Northern Ireland were suffering from Fuel Poverty which is attributed to have led to almost 500 cold weather related deaths. Each and every one of these deaths could have been prevented!

It is to this end that we work across key Government Departments, NGOs, the public, private and voluntary sector to maximise any opportunity available to us to mitigate and ultimately eradicate fuel poverty.

We therefore welcome the opportunity to continue to work with NIAUR and comment on your Forward Work Programme. Following your framework we have made some comments on the priorities, projects and potential gaps with some general comments which we hope you will find useful under the relevant refs.

REF 1 and 2

With the recent introduction of competition we feel that vulnerable clients are still not motivated or aware of the switching process. The majority of households have remained with the incumbent and therefore we feel that NIAUR should continue to ensure that where monopolies exist to whatever extent appropriate regulation is maintained to ensure consumer protection.



REF 4, 5, 6

It is imperative that the supply licence and retail market monitoring is assessed to ensure compliance and it would be useful to understand how this will be monitored and assessed.

We believe that it is imperative to look at best practice in GB and understand that some protection are afforded to a GB customer and not available to NI customers. We believe that this is a piece of work which needs further investigation and are disappointed that it has been awarded a priority 2. Fuel poverty in NI doubles that of England and hence any positive steps in regulation in GB should be expediently adopted in NI.

The consumer checklist is not a user friendly document at present and while we understand that NIAUR has prioritised this issue it will require much work with organisations such as NEA NI. We look forward to working with you and making this document one which is meaningful for all customers.

REF 7

At a time when competition is relatively new, it is vital that customer experiences and issues arising due to competition are researched. We believe that this too should be given priority 1 as there is a dearth of research in this area. Consumers are not aware of their rights, choices and areas to consider in the switching process. This needs to be addressed urgently.

REF 9

It is vital that Social Action Plans are developed both by the NIAUR and the Energy Companies. It would be useful to have targets set to help Utilities understand how they could deliver meaningful actions to assist the vulnerable and fuel poor.

REF 10, 11, 12

We commend the NIAUR for their work with licenses and enhanced Supplier Codes of Practice and look forward to working with you to realise their aspirations and enhance consumer protection.

REF 18

We believe that SMART meters present us with opportunities to control and change behaviour but have concerns that the meter may also encourage vulnerable and low income earners to ration energy to detrimental ends. Additionally the introduction of SMART meters can enable the Supply



Campaigning for Warm Homes

Companies to overcome some current protections which are afforded under current legislation. The introduction of SMART meters should not lessen the current levels of protection currently afforded.

REF 34

The NISEP which is 80% ring-fenced for the fuel poor has been instrumental in helping us provide solutions to fuel poverty. It is vital that the introduction of the Energy Efficiency Obligation is given priority and is consulted upon widely. This may call for an outside agency such as NEA to ensure that the design and delivery of such an obligation has the fuel poor at the heart of the concept. We look forward to working with the NIAUR to this end.

GAPs

We are disappointed that some work on tariffs has not been incorporated into the FWP and would respectfully call on NIAUR for action in this area. While the size and scale of fuel poverty is overwhelming, we still believe that some households are experiencing the issue in a much harsher way, due to age or disability. We believe that there are possibilities to look at this area from an innovative perspective and would call on the NIAUR to take the lead in bringing or facilitating a process to investigate how we might provide a form of affordable warmth tariff.

Thank you for the opportunity to respond to your FWP. We look forward to working with you over the coming year to capitalise on any opportunity to eradicate fuel poverty in Northern Ireland.

Ms Pat Austin

Director NEA NI