

EEPH Fuel Poverty Strategy Group response to Defra's Call for Evidence on the Household Energy Supplier Obligation from 2011: A Call for Evidence

1. The Energy Efficiency Partnership for Homes (EEPH) is a voluntary network of over 400 organisations concerned with promoting domestic sustainable energy. The Partnership is facilitated by the Energy Saving Trust and funded by Defra.
2. The Fuel Poverty Strategy Group brings together a wide range of organisations from public, private and voluntary sectors concerned with fuel poverty. It provides guidance on fuel poverty issues for other groups in the EEPH and the group shares information about – and seeks to inform - fuel poverty policies, programmes, activities and relevant best practice across the UK. The group is unique in being the only cross-UK body with oversight of fuel poverty initiatives. The non-government members of this group are:
 - Age Concern
 - Association for the Conservation of Energy
 - CSE
 - eaga
 - Eaga Partnership Charitable Trust
 - ecsc
 - Energy Action Scotland
 - Energy Retail Association
 - Energy Saving Trust
 - Energywatch
 - Leicester City Council
 - National Energy Action
 - National Right to Fuel Campaign
 - Ofgem
 - UK Public Health Association

Please note this response is submitted as a majority view of these non-government members: the views expressed should not be taken as those of any individual member organisation. The response only reflects the views of the non-Governmental members of the group since it is not appropriate for Government representatives to state an opinion, a procedure long established within the Energy Efficiency Partnership for Homes

3. The FPSG welcomes the opportunity to inform Defra's plans for the Supplier Obligation.
4. There is insufficient evidence to allow the group to reach a view on which of the two high level approaches to the new obligation is more appropriate. However, whichever approach is taken, it is vital that compensatory mechanisms are incorporated to ensure that low income customers benefit equally from the programme and that the costs of the programme do not fall disproportionately on low income households.
5. The group would be concerned if the 'cap and trade' option led to less support for long term energy efficiency measures. We consider it particularly important that the obligation provides increased and more secure funding for hard to treat measures and that such measures are focussed on the properties of low income households.
6. The group does not believe that benefit entitlement checks or trust funds should form part of any type of supplier obligation.