We do not have any comments to make on the bill itself. However, we are concerned about the impact of the following proposal in the draft fuel poverty strategy which proposes to require houses occupied by fuel poor households to achieve a higher standard of energy efficiency than the rest of the housing stock: -

**Fuel Poor Household Standards**

Due to the depth of fuel poverty experienced in some households we know that reaching EPC C will not be enough to lift all households out of fuel poverty. That is why we are proposing a higher ambition for fuel poor households, regardless of tenure. The Route Map sets out these ambitious targets which will act as a guide for our national and area-based fuel poverty programmes. In practice this will mean maximising the level of improvement possible within limits affordable to the public purse.

Whilst we support the principal of removing as many households as possible from fuel poverty, we have concerns about how this will operate in practice in the private rented sector (PRS) if it is implemented.

Our concerns are as follows: -

1. It is not clear who would be expected to: -
   1. cover the cost of energy efficiency improvements to meet the higher standard
   2. cover the costs of ancillary costs associated with the improvements e.g. redecoration, applying for consents for work, moving fixtures and fittings to allow insulation work to take place.
   3. organise and oversee the upgrading work

2. If landlords are expected to arrange work and cover the above costs then this will lead to landlords choosing not to let properties to vulnerable tenants who are likely to be classed as fuel poor at any point during the tenancy. We therefore only support this proposal if the three points above are covered by the public purse.

3. We are also concerned that significant changes to the fabric of a property might be required at significant cost to either the landlord or the public purse based on the circumstances of a tenant who could at any time no longer be classed as fuel poor due to a change in their income or outgoings.

4. Under the new Private Residential Tenancy regime PRS tenants can give 28 days’ notice to end the tenancy at any time and then move elsewhere resulting in similar costly upgrading work being required at their new property. We are concerned about
the potential for this to result in higher than expected costs to landlords or the public purse.