Q1: Do you agree with the Scottish Govt’s proposal to provide for a statutory target to reduce fuel poverty to no more than 5% of Scottish households by 2040.

EHC (The Electric Heating Company) agree that fuel poverty has historically been an issue for many thousands of Scottish households for many years and we agree that efforts should be made to alleviate fuel poverty wherever and whenever possible. We have been involved in supplying heating systems and providing support and energy advice to Scottish social landlords for around 14 years and have built up a wealth of knowledge and data in this period. We feel that everyone should be entitled to live in a warm, dry and affordable to heat home as a basic right.

We would question whether reaching the target of only 5% of households being exposed to fuel poverty by 2040 may be too ambitious and unrealistic. In 2002 Scottish ministers committed to “so far as reasonably practicable, that people are not living in fuel poverty by November 2016” In 2016 despite the introduction of a new energy model fuel poverty rates had risen from 16% in 2003/04 to a level of 26.5% in 2016. Despite an investment of £0.5 billion from 2009 a large increase in fuel poverty levels was recorded. Further investment levels must be justified and all measures co-ordinated to ensure there is a positive outcome by 2040?

The Scottish Govt has a duty to the taxpayer to ensure that the target of 5% of households in fuel poverty is actually achievable and value for money has been evidenced.

The 2040 timescale could also potentially condemn a further generation of Scots to endure fuel poverty and EHC feel this is at minimum questionable.

If this date and target are enshrined in law what would be the ramifications if the 5% target is not met by this date?

Q2: Do you agree with the Scottish Govt’s proposals for a revised definition of fuel poverty?

EHC agree that using AHC as the proposed definition is a positive step and provides a more realistic measure of actual fuel poverty as opposed the BHC method currently utilised. EHC would question the wisdom in not adjusting the UK Minimum Income Standard upwards to take account of the specific needs and circumstances of the many households experiencing fuel poverty in rural areas of Scotland. The disparity of fuel poverty levels of up to 58% in rural areas in comparison to just over 20% in some urban areas cannot be ignored.
EHC also take the view that the large amount of households deemed “fuel poor, not income poor” can be helped out of fuel poverty by a process of education which ensures that they use their energy in the most efficient and economic manner possible. This education should entail general energy advice and more importantly a basic understanding how to operate their controls to suit their lifestyle and property. EHC has vast experience of educating end users and typically we see savings ranging between 15 to 20% per annum on fuel costs. Whilst other initiatives such as insulation etc are clearly important we feel that the education issue will have a more direct impact for the fuel poor.

Q3: Do you agree with the provisions in the Bill requiring the Scottish Govt to publish a fuel poverty strategy? Do you also agree with the consultation requirements set out in relation to the strategy?

EHC on the whole agree with the provisions in the Bill although we would like to see the opportunity to provide fresh ideas and impetus from commercial organisations such as EHC expanded to provide further value to the consultation. EHC have successfully worked with Councils and SRL’s from the Orkney Isles to the Scottish Borders for around 14 years and would be delighted to share our wealth of data and experience with any stakeholder involved and as such play our part in ensuring the 2040 targets are met. We believe that support and exchange of knowledge can be gained not only within the public sectors.

Q4: A draft fuel poverty strategy was published alongside the Bill on 27 June. Do you have any views on the extent to which the measures set out in the draft Fuel Poverty Strategy for Scotland 2018 will contribute to meeting the Govts new target? Have lessons been learned from previous initiatives?

EHC believe that Scottish taxpayers have the right to expect value for their money and as such expenditure of around £0.5 billion as per previous initiatives which resulted in increased fuel poverty levels are simply unacceptable if the Scottish Govt wish to maintain credibility with the Scottish taxpayer. If the 2040 target is to be enshrined in law the consequences of not meeting the target will also have to be documented to ensure transparency and credibility.

EHC also think that the non-statutory interim targets are vague and require becoming mandatory due to the long timescale between the publishing of the legislation and 2030.

We would also advocate utilising private sector organisations throughout the process as speaking for EHC we have a wealth of experience in the social housing arena and have to provide a first class level of service and satisfaction to our clients and end users or we would not continue to flourish in this arena. Expertise such as ours would, in our opinion, be invaluable in assisting meet the taxing 2040 target of the Bill.

Q5: Do you have any views on the Scottish Govts reporting requirements to the Scottish Parliament, as set out in the Bill?

EHC do not feel we have the evidence or the experience to answer this question.