Question 1

Do you agree with the Scottish Government’s proposal to provide for a statutory target to reduce fuel poverty to no more than 5 per cent of Scottish households by 2040?

As a large energy supplier, we are committed to playing our part in supporting those in or at risk of fuel poverty, including through our delivery to households across Britain under the Energy Companies Obligation (ECO) and the Warm Homes Discount (WHD) scheme.

In this context, we, support the Scottish Government’s targeting of a reduction in fuel poverty to no more than five per cent of Scottish households by 2040. Making progress towards such a target will clearly be a key aspect of the Energy Efficiency Scotland initiative. We are committed to working with the Scottish Government as the work on developing the underlying future strategy is taken forward. In particular, we welcome the opportunity for sharing our perspective based on our own delivery experience with a view to ensuring that individual policies are as effective as possible and designed in a way that is complementary and consistent.

Question 2

Do you agree with the Scottish Government’s proposals for a refined definition of fuel poverty?

We broadly agree with the Scottish Government’s proposed definition of fuel poverty. However we would note that the definition is complicated and this could present some challenges for the Government and stakeholders around planning for future delivery and indeed monitoring progress.

In order to better target delivery to those in fuel poverty across the country, the Scottish Government might wish to consider ways of better taking into account the additional costs of living in rural and island areas.

In considering delivery, one approach that might merit further consideration is making use of a concept similar to ‘Local Authority Flexible Eligibility’ in the current Energy Company Obligation (ECO) scheme since this allows for the varying characteristics of fuel poor and low income households to be taken into account based on the circumstances in a particular locality. For example, this kind of approach might be a way of providing the flexibility to take into account the additional expenses arising from a disability, notwithstanding that they are not fully accounted
for in Disability Living Allowance (DLA) or the Personal Independence Payment (PIP) benefit payments.

We would note that households to which the different heating regimes will apply are to be defined in regulations to be made under the proposed legislation. For the ‘enhanced heating regime’, it will be important that all health conditions which have temperature-related vulnerability are included. A process of effective consultation should help to ensure that this happens.

**Question 3**

Do you agree with the provisions in the Bill requiring the Scottish government to publish a fuel poverty strategy? Do you also agree with the consultation requirements in relation to the strategy?

Please explain your reasons why.

We recognise the merit in a requirement for the Scottish Government to publish a fuel poverty strategy outlining how progress towards delivery upon the overarching ambition is to be achieved. This strategy should set out a coherent approach towards making progress over time. To facilitate the effective development of this strategy, we agree that it will be important to consult thoroughly on the strategy.

**Question 4**

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

Importantly, we consider that the Scottish Government will need to make commitments to long-term public funding at a level that is commensurate with delivering progress towards meeting its challenging ambition. Whilst the draft fuel poverty strategy notes a number of actions aimed at contributing towards progress (including continuing with grant funding programmes to low income households), it will be important to ensure that appropriately targeted public funding initiatives are sustained over the long-term.
Question 5

Do you have any views on the Scottish Government’s reporting requirements to the Scottish Parliament as set out in the Bill?

We agree that regular reporting is important to ensure effective monitoring of progress.

Stuart Noble
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November 2018