ASSIST 2GETHER

Vulnerable Consumers Protection Framework Paper

2020

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Acknowledgments

The “Vulnerable Consumers Protection Framework Paper” has evolved from the ASSIST partnership and derives from the discussions within the three rounds of National and EU Vulnerable Consumers Steering Committees and Market Actors’ Dialogues. Participants from various backgrounds took part in 39 meetings and provided useful reviews and recommendations in the field, enriching the final document. The names of the participants, contributing to the Framework paper are enlisted in Annex 5.

The Framework paper is based also on the activities (research – training – networking – in field action – communicating to vulnerable consumers) implemented successfully by the project partners: AISFOR SRL, RSE SPA and AU SPA, Italy; VITO and Fluvius, Belgium; VaasaETT, Finland; FK and KAPE, Poland; ECOSERVEIS and ADEE, Spain; SWEA, UK and the European Anti-Poverty Network (EAPN).

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Abbreviations:

BE - Belgium
BESN – Big energy saving network
CHP – Combined heat and power
CSOs – Civil society organizations
DSO – Distribution system operator
EC – European Commission
ECO – Energy company obligation
ES – Spain
EU - European Union
FI – Finland
HEA – Home energy adviser
IT – Italy
MAD – Market actors' dialogue
MS – Member-state
NECPs – National energy and climate plans
NGOs – Non-governmental organizations
PAE – Point of energy assistance
PL - Poland
SWOT – Strength – weaknesses- opportunities - threats
UK – United Kingdom
VAT – Value added tax
VCs – Vulnerable consumers
VCSC – Vulnerable consumers' steering committee
WHD – Warm home discount

Foreword

The ASSIST project is a European 'market activation and policy orientation' project (2017-2020) to tackle energy poverty and support vulnerable consumers. Its aim is to actively engage consumers with the energy market, helping them to change their consumption behaviour, and to influence the design of energy poverty and vulnerability policies. Partners from Italy (leading), Belgium, Finland, Poland, Spain and United Kingdom and the European Anti-Poverty Network (EAPN) took part in it.

One of the project objectives is **to elaborate a "Vulnerable Consumer Protection Framework Paper",** addressing two main questions:

- ✓ How can we promote an appropriate working mechanism for the fight against energy poverty and vulnerability at European and national levels?
- ✓ How can we improve the political decision-making process in order to generate effective consumer protection measures to cope with energy poverty and opportunities to address it?

The "Vulnerable Consumers Protection Framework Paper" presents political pathways/roadmaps to promote vulnerable consumers' protection in the energy market. It comes from the joint activities of the partnership and derives from the discussions from three rounds of National and EU Vulnerable Consumers Steering Committees and Market Actors' Dialogues, as well as from the different activities undertaken by the project: research, training, networking and in-field actions. It **includes review, assessments and policy recommendations** in the field of energy poverty and vulnerability.

Executive Summary

Energy poverty and vulnerability policies are becoming increasingly important in the EU and Member States. Many recent EU policies stimulate such developments, such as the Clean Energy for all Europeans Package adopted in 2019, in particular the directive on market design (2019/944) which provides the first elements of a pan-European definition; and the Governance regulation (2018/1999) that requires Member States to assess the levels of energy poverty in their integrated National Energy and Climate Plans (NECPs). Further documents, such as the European Commission's assessment of the draft NECPs (June 2019); the European Green Deal Communication, and the Action Plan to implement the European Pillar of Social Rights (January 2020) confirm this trend.

Many social protection measures, initiatives and projects related to energy poverty and vulnerability are also being implemented in Member States. These measures have mobilised national and local authorities and actively involve stakeholders such as national economic and social committees, social partners, civil society organisations, non-governmental organisations and business initiatives, although to varying degrees.

It results in relevant transformations at EU and national levels:

- A growing recognition of the risk of energy poverty and its policy importance;
- Intensified discussions on the strengths and weaknesses of the different options and alternative approaches and a better return on experience on the implementation of policy interventions for the alleviation of energy poverty, providing a ground for future improvements;
- More focused policy approach on energy poverty and consumer vulnerability and additional specific policy instruments;
- Development of networks for energy poverty alleviation and direct involvement of vulnerable consumers as active participants in the fight against energy poverty.

Analysis carried out in the last three years (2017-2020) assessed the different energy poverty alleviation measures and initiatives available in their respective territories. Despite progresses, the shared opinion is that those measures are not enough ambitious or effective, and do not address the root causes of energy poverty. Many initiatives and efforts remain short-lived, not fit-for-purpose and do not substantially contribute to reducing energy poverty. Most of the interventions are focused on financial support and consumer behaviour. This approach has achieved some positive results, but it is unlikely that it will generate strong long-term social acceptance and public support for reform.

Considering the current policy measures and other initiatives, the ASSIST project produced recommendations for improvements in each and every stage of the policy interventions. Member States and regions are progressing at very different speeds. Depending on their progress, countries and regions need specific steps. A new policy mix, based on multi-pillar, multi-layer, multi-level and multi-player dimensions is needed to ensure a just transition. The combination of these proposals suggests that significant and decisive changes in the design of social protection for vulnerable consumers are necessary to address energy poverty and vulnerability in a structured way.

A summary of recommendations arising from ASSIST analysis is presented below:

Recommendation 1: use a multi-pillar approach to address the direct energy poverty drivers consistently and improve energy markets

- Better **monitoring, analyses and appropriate interventions in energy prices setting** are needed. Energy prices and their evolution have a direct and substantial impact on energy poverty and vulnerability. Still, they are rarely addressed by current policy measures.
- **Incomes and social benefits need to be assessed against adequate minimum incomes**, including energy costs. The level of most of the available measures is insufficient. Regular assessments and updating of the levels of social benefits are necessary.
- Targeted support for **improving the energy efficiency of houses of energy-poor and vulnerable households** should be a high priority, including more quality homes in the lower segments of the rental markets and investments in efficiency in social housing;
- A careful review and analysis of **the way energy markets are constructed** (effectiveness of existing regulation/de-regulation; market opening and level of competition**) and operate** (how markets shape the energy prices) is needed to assess the functioning of the energy markets. Providing transparent information on businesses practices and strengthening the measures against unfair business and commercial practices, instead of naïvely rely on the "invisible hand" of the market, is needed.
- Policymakers should stimulate new forms of ownership, such as energy cooperatives and prosumers, to counteract the exclusion of consumers from the energy production chain and enhance de-concentration trends.

Recommendation 2: implement a multi-pillar approach to improve the consistency of policies that impact energy poverty

- **Financing a just energy transition requires a clear evaluation of its impact on different income groups**. General progressive taxation should be preferred over levies applied to energy bills. A simultaneous shift of the taxes from consumption to the kind of energy sources could also be relevant.
- Employment policies, if supporting low-quality jobs, put pressure on low-incomes, lead to growing income inequalities and result in increased energy poverty. Minimum incomes, including minimum salaries and wages, minimum pensions, and unemployment benefits need to be assessed on the basis of **minimum adequate standard of living**, including energy needs.
- Integrated approach and **meaningful collaboration** could fill in the current gaps between policies in different fields such as tax, employment, social and welfare policies, healthcare and policies against energy poverty. Likewise, **social justice and environmental concerns** need to be considered together.
- A **careful assessment of the sequence of policy steps** is crucial for combating energy poverty and vulnerability. A faster rate of conversion to renewable energy sources needs to be balanced with the overall incomes growth and poverty reduction. When the growth of energy production from renewable sources is much faster, it can reduce the effects of the policies to tackle energy poverty.

Recommendation 3: utilise a multi-player approach to develop better decision-making process and a broader involvement of the different stakeholders

- Boost **structured dialogues and feedbacks between the parties**, through **bottom-up energy experience**. Opinions and advice from vulnerable consumers to policymakers would contribute to a better empowerment of vulnerable consumers and finding better solutions to existing problems.
- Strengthen the **direct participation of NGOs, social workers and vulnerable consumers** in the monitoring of the causes, the state-of-the-art and the consequences of energy poverty. They should also get stronger stimuli to engage in policies formulation and implementation.
- Improve the interaction of stakeholders to better coordinate and strengthen **the role of intermediaries** is important to **stimulate social approval and public support for reform**. The experience of social workers, established networks and training activities should be used to boost awareness-raising and draw lessons on current weaknesses.

Recommendation 4: set up a multi-layer approach to improve the "policy cycle" of relevant public policies

- Identification enables **the recognition of causes of energy poverty and target groups**. Improved identification of target groups improves the legal framework, establishes an adequate minimum range of support and protection and provides more adequate criteria for monitoring. These instruments will contribute to better identification of vulnerable consumers, better targeted measures for groups with special needs (people with disabilities, old people, immigrants, etc.), better non-financial and financial support for the vulnerable households and better measuring of energy poverty level and dynamic.
- **Social impact assessments** and more intensive evaluations of policies against energy poverty and the monitoring of their impact on inequalities and distributional effects, contribute to improving all the other stages of the policy cycle. Evaluations are particularly necessary to identify unexpected and undesirable policy effects.
- Additional attention is needed to collect useful **feedback stemming from the evaluation to the identification stage**. Currently, many research and projects on EU, national and local level remain overlooked. A clear and transparent mechanism to incorporate research and assessments' results generally means a higher quality of the elaboration and implementation policies, including increased knowledge for evidence-based policies.

Recommendation 5: employ a multi-level approach to ensure better policy requirement and the coordination of initiatives at EU, national and local level

- **Clearer guidelines and indicators** at EU level would help EU Member States elaborate their national definitions and strengthen specific national policies.
- **National Energy Policy Observatories**, following the model of the European Energy Poverty Observatory, could be very useful for national developments and co-operation at EU level, especially for Member States with high levels of energy poverty and vulnerability.

- **Addressing discrepancies between EU, national and local policies** is necessary in order to address the root causes of energy poverty consistently
- **The transfer of best practice** to Member States with high and persistent energy poverty levels is needed, from regional initiatives or successful national approaches.

Moving ahead to sustainably solve energy poverty and vulnerability issues could profit from a more developed vision of what could be called ***energy welfare***. This concept incorporates a decent consumers' purchasing power (instead the current divide between incomes and prices), good quality of homes and affordable and clean energy. The energy welfare could provide more clarity and outline paths and steps by which effective policy can lift people out of energy poverty and **enforce the right to energy**.

Introduction

ASSIST is a 38-months European 'market activation and policy orientation' project aimed to tackle energy poverty and support vulnerable consumers. Its objective is to actively engage consumers in energy markets by helping them to improve their energy consumption pattern and to influence the design of anti-energy poverty policies.

Based on the work of the Citizens' Energy Forum[1] and the European Commission's Vulnerable Consumers Working Group[2], the project combined activities addressing both energy and social dimensions. Energy (or fuel) poverty is neither an energy-only issue nor can it be tackled out of the context of poverty. Specifically, the ASSIST strategic objectives are aimed to:

- ✓ Tackle energy poverty;
- ✓ Reduce the main barriers of the energy market experienced by vulnerable consumers;
- ✓ Support vulnerable consumers to be more efficient in relation to their domestic energy consumption.

Energy poverty and consumers vulnerability are relatively new policy challenges, which only began to become relevant at European level in the late 2000s (Bouzarovski, 2018)[3]. Therefore, efforts still need to be put into designing future energy policy initiatives to ensure a socially responsible and inclusive Energy Union. It implies a particular focus on establishing the appropriate framework for consumer engagement and the protection of the energy-poor and vulnerable consumers.

The ASSIST project implemented diversified, but correlated, research, training and networking activities as well as in-field actions, consistent with the relevant national and European-wide energy poverty dynamic and policy responses. Besides, the project worked on creating national and European multidisciplinary think tanks to put energy poverty on the political agenda at regional, national and European levels, propose recommendations and stimulate dialogues between stakeholders on relevant policies and strategies.

ASSIST elaborated this **"Vulnerable Consumers Protection Framework Paper"** illustrating different ways to engage political stakeholders, launch initiatives in favour of improving national and European policy to protect vulnerable consumers and provide information on energy needs and efficiency measures for energy-poor and vulnerable consumers. This Framework Paper aims at:

1. integrating existing measures and initiatives to support vulnerable consumers,
2. assessing the results of the ASSIST project activities (training – networking - in-field actions), and

[1] European Commission, https://ec.europa.eu/energy/topics/markets-and-consumers/energy-consumer-rights/citizens-energy-forums_en?redir=1

[2] European Commission (2013) Vulnerable Consumer Working Group Guidance Document on Vulnerable Consumers, https://www.energypoverty.eu/publication/vulnerable-consumer-working-group-guidance-document-vulnerable-consumers-november-2013

[3] Bouzarovski S. (2018), Energy Poverty: (Dis)Assembling Europe's Infrastructural Divide, https://doi.org/10.1007/978-3-319-69299-9_1

3. providing social and energy recommendations to policy and decision-makers on appropriate measures and strategies. The latter could be used to improve the situation of vulnerable consumers in terms of generic consumer protection, non-financial support and financial support.

The Vulnerable Consumers Protection Framework Paper illustrates political pathways/ roadmaps to promote vulnerable consumers' protection in the energy market. It is based on own findings and combines results of all the phases of the ASSIST project as well as the specific policy orientation tasks. It promotes dialogues between the national and European stakeholders and aims to increase the knowledge of policymakers on consumer vulnerability and energy poverty so as to boost the creation of relevant policies.

Methodology

To prepare this Framework Paper, ASSIST conducted activities at national and European level between 2017 and 2020:

- Partners set up national steering committees (Vulnerable Consumers Steering Committee – VCSC) to collaborate throughout the project lifespan. VCSCs aimed to ensure that the ASSIST project activities complemented other national initiatives with the same objective, with the support of the main national key stakeholders and were widely disseminated while triggering the political process. Partners also promoted active national market actors' dialogues (MADs) through the organization of several workshops and roundtables with national stakeholders.
- At European level, a European VCSC was established and three roundtables were organised.

The findings of this Framework Paper stem from information, documents and comments provided by project partners and the outcomes of the three European and eighteen national VCSC roundtables, the eighteen market actors workshops, the two European conferences and during bilateral meetings with social stakeholders or media interviews with them. The "Vulnerable Consumers Protection Paper" also contains quotes to better capture energy poverty in the relevant context. The quotes were collected during different activities of the project or during bilateral meetings with social stakeholders or media interviews with policymakers.

The established Vulnerable Consumers Steering Committees and Market Stakeholders Dialogues were intrinsically involved in the different ASSIST activities. Thus, the discussions and policy proposals go hand in hand with ASSIST activities and the policy proposals are internally integrated and derived also from participant' experience and ASSIST activities.

The reports of the different meetings were used to draft this Framework Paper. In particular, the participants in the meetings:

- *presented and discussed* existing measures and initiatives to support vulnerable consumers

- *assessed the existing measures and initiatives* in reference with their ability to support vulnerable consumers and to contribute to energy poverty alleviation
- *made recommendations to policymakers on measures/policies/strategies* which could be used to improve the situation of those who struggle to pay for their basic energy needs in terms of consumer protection in general, including non-financial and financial support.

In particular, the following policy issues were discussed during the national VCSC and MADs meetings and the European VCSC meetings[4]:

Questions discussed at the first round of meetings:

1. Is there a definition of energy poverty in your country? Of vulnerable consumers and/or people experiencing energy poverty?
2. Are there differences in the understanding of the phenomenon between the social and the energy stakeholders? What are the main points on which the social and energy stakeholders agree and/or disagree? / What brings them together and what divides them?
3. What are the main issues dominating anti-energy poverty policy agenda? What are the main concerns? What are the positive aspects?
4. Are there measures in place for supporting vulnerable consumers?
5. What are your policy recommendations in relation to tackling energy poverty?

Questions discussed at the second round of meetings:

1. Usually it is considered that there are three main drivers for energy poverty: prices, incomes and the quality of the buildings. Do current policies respond adequately to each of these drivers?
2. How should social protection of vulnerable consumers be strengthened to cope with energy poverty?
3. How should the mechanisms for socially responsible and inclusive policy-making at national and EU level be improved?
4. How should the social dialogue between energy and social stakeholders be improved in order to better reconcile their interests?
5. How should the citizens' involvement and their capacity to participate effectively in the decision-making process concerning vulnerable consumers and energy poverty be strengthened?
6. Are you aware of the National Energy and Climate Plans (NECPs) submitted by your government under the Governance directive? What is your view on what is mentioned in the report on energy poverty? Is there something missing?

The elaboration of the "Vulnerable Consumers Protection Paper" is based on the following process:

1. The first meetings of the National and European VCSC and the Market Actors' workshops held in 2017 - 2018;
2. A first draft of the "Vulnerable Consumers Protection Framework Paper" was developed, discussed and agreed by all partners and presented to the European Commission

[4] See answers in Annexes 2, 3 and 4

towards the end of 2018. It was based on the outcomes of the previously held meetings and used results from implemented ASSIST research (analysing national situations in the partner countries and available EU projects, as well as using other studies on energy poverty, its causes and the effectiveness of policies to address this problem and relevant documents from different institutions);

3. The second meetings of the National and European VCSC and the Market Actors' workshops were held in 2019. These meetings discussed the identified questions, comments and suggestions, sometimes including opposing ones, to improve the Draft Framework Paper;
4. Work packages leaders presented SWOT analyses for each of their respective work packages. All partners summarised lessons learned for the different work packages (training; networking; field actions and communicating energy efficiency to vulnerable consumers in reference with the national situations);
5. The preparation of the final draft of the "Vulnerable Consumers Protection Framework Paper" was based on the first draft and was substantially enriched with results from the 2nd meetings of VCSCs and MADs, reflecting comments and proposals for improvements, and incorporating of main conclusions/recommendations linked to different ASSIST activities: training – networking – in field action;
6. The final draft of the "Vulnerable Consumers Protection Framework Paper" was discussed at the third meeting rounds (held in 2020) to refine and improve it.

This "Vulnerable Consumers Protection Framework Paper" has evolved from the joint activities of the partnership and provides policy recommendations.

Structure of the "Vulnerable Consumers Protection Framework Paper"

The "Vulnerable Consumers Protection Framework Paper" structures the most important results of the afore-mentioned activities. It is aimed at reviewing, assessing and providing policy recommendations, in particular:

1. A review and assessment of policy interventions and measures to protect vulnerable and energy-poor consumers;
2. A review and assessment of project-based interventions to reduce energy poverty and energy vulnerability;
3. Proposals for improvements for the vulnerable consumers' protection in the field of energy poverty.

Annex 1 presents data from EU SILC on the share of population unable to keep their homes adequately warm for a 10 years period (2009-2018) in all the EU countries.

Annexes 2, 3 and 4 provide the detailed responses to the questions asked in the partner countries (VCSC and MADs) as well as during the EU VCSC in the 1at and 2nd meetings.

Part 1: REVIEW AND ASSESSMENT OF POLICY INTERVENTIONS AND MEASURES TO PROTECT VULNERABLE AND ENERGY-POOR CONSUMERS

Energy poverty and vulnerability policies are becoming increasingly important in the EU and Member States. The EU assesses that more than 50 million Europeans are affected by this growing issue[5]. This is why Member States must now monitor the situation in their countries. Many recent high-level EU documents stimulate such developments, such as:

- The Clean Energy for all Europeans Package adopted in 2019: tackling energy poverty at its roots and strengthening vulnerable consumers protection are policy priorities. It is particularly visible in the Market Design Directive ((EU) 2019/944)[6] and the Energy Efficiency Directive ((EU) 2018/844)[7].
- Regulation (EU) 2018/1999 on the Governance of the Energy Union and Climate Action[8]: Article 9 requires Member States to prepare integrated National Energy and Climate Plans (NECPs) that present energy poverty issues and solutions in their national contexts;
- The European Commission's assessment of the draft NECPs on the possible aggregated effects in reaching the EU Energy Union objectives and 2030 targets[9] (June 2019);
- The European Green Deal Communication[10], presented at the end of 2019, which aims to make the climate transition "just and inclusive for all". The EC will issue "guidance to assist Member States in addressing the issue of energy poverty" in 2020;
- The new EC Communication setting out the road towards an Action Plan to implement the European Pillar of Social Rights[11] presented on the same day as the Just Transition Mechanism (14 January 2020) confirms this trend.

Simultaneously, many social protection measures, initiatives and projects related to energy poverty and vulnerability are being implemented in Member States. These measures have mobilised national and local authorities and actively involve stakeholders such as national

[5] See European Commission, Energy poverty, retrieved from https://ec.europa.eu/energy/topics/markets-and-consumers/energy-consumer-rights/energy-poverty_en?redir=1. Last visited on 29 May 2020

[6] Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU

[7] Directive (EU) 2018/2002 of the European Parliament and of the Council of 11 December 2018 amending Directive 2012/27/EU on energy efficiency

[8] Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action

[9] European Commission (2019) Communication From The Commission - United in delivering the Energy Union and Climate Action - Setting the foundations for a successful clean energy transition COM/2019/285 final

[10] European Commission (2019) Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions on the European Green Deal COM/2019/640 final

[11] European Commission (2020) Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions on A Strong Social Europe For Just Transitions COM(2020) 14 final

economic and social committees, social partners, civil society organisations, non-governmental organisations and business initiatives, although to varying degrees.

Data on energy poverty, to the extent available, support the European Commission's assessment of the level of energy poverty. The evolution of the share of population in EU countries unable to keep home adequately warm is presented (2009 – 2018) in Annex 1.

Data retrieved from the European Energy Poverty Observatory also show the following figures, relevant to the project partner countries

Table 1 - Levels of energy poverty in ASSIST countries given the main indicators

Indicator	*Arrears of utility bills*[12] *- %*	*Inability to keep home adequately warm*[13] *- %*	
Year	2018	2015	2018
Belgium	4.5	5.2	5.2
Finland	7.7	1.7	1.7
Italy	n/a	16.1	14.0
Poland	6.3	7.1	5.1
Spain	7.2	10.1	9.1
UK	n/a	7.8	5.5

Source: EPOV, Extracted on 27.02.2020

1.1. Scope and definitions of energy poverty and vulnerable energy consumers

1.1. Definitions of energy poverty and vulnerable energy consumers

The definition of energy poverty and vulnerable consumers are important policy tools, since they help to assess the scale of the problem and its importance, the need and modes of interventions and their effects.

The discussions during the national VCSC meetings confirm Bouzarovski's thesis that the debate on the interferences between social protection, housing and energy consumption at EU level has received little attention at national scale in most Member States (Bouzarovski and Petrova, 2015[14]; Bouzarovski *et al.* 2012[15]). This finding is also confirmed by the lack of

[12] "Arrears on utility bills - Share of (sub)population having arrears on utility bills, based on question "In the last twelve months, has the household been in arrears, i.e. has been unable to pay on time due to financial difficulties for utility bills (heating, electricity, gas, water, etc.) for the main dwelling?"

[13] "Inability to keep home adequately warm - Share of (sub)population not able to keep their home adequately warm, based on question "Can your household afford to keep its home adequately warm?".

[14] Bouzarovski S., Petrova S., (2015) A global perspective on domestic energy deprivation: Overcoming the energy poverty–fuel poverty binary, Energy Research & Social Science, Volume 10, Pages 31-40, ISSN 2214-6296, https://doi.org/10.1016/j.erss.2015.06.007

common definition or framework in relation to energy poverty, as stressed in the documents produced within ASSIST related to the analysis on definition in all countries.

The European level gives a relatively clear description of energy poverty, understood as a condition where a household is unable to access energy services in the home to a socially and materially acceptable level (Bouzarovski *et al.* 2012).

The "Market Design Directive" (EU) 2019/944) states that (recital 59):

> *Energy services are fundamental to safeguarding the well-being of the Union citizens. Adequate warmth, cooling and lighting, and energy to power appliances are essential services to guarantee a decent standard of living and citizens' health. Furthermore, access to those energy services enables Union citizens to fulfil their potential and enhances social inclusion. Energy poor households are unable to afford those energy services due to a combination of low-income, high expenditure on energy and poor energy efficiency of their homes. Member States should collect the right information to monitor the number of households in energy poverty. Accurate measurement should assist Member States in identifying households that are affected by energy poverty in order to provide targeted support. The Commission should actively support the implementation of the provisions of this Directive on energy poverty by facilitating the sharing of good practices between Member States.*

The same directive requires Member States to define the concept of "*vulnerable consumers, which may refer to energy poverty and, inter alia, to the prohibition of disconnection of electricity to such customers in critical times*" (Article 28). The definition "*may include income levels, the share of energy expenditure of disposable income, the energy efficiency of homes, critical dependence on electrical equipment for health reasons, age or other criteria*" (Article 28). When assessing the number of households affected by energy poverty (a requirement of the Governance Regulation (EU) 2018/1999) in the context of the National Energy and Climate Plans (NECP)), energy poverty shall be defined at the national level using "*a set of criteria, which may include low-income, high expenditure of disposable income on energy and poor energy efficiency*" (Article 29).

However, there is still no commonly agreed formal definition which would enable a consistent policy framework that would trigger and facilitate the policy-making process. Such a definition would provide precise identification of energy-poor and vulnerable consumers, their needs, the impact of policy interventions and the assessment of their effects.

Therefore, differences remain at national level in defining energy poverty. Such differences can also be noted in the use of different terms that are considered to be equivalent (energy poverty, fuel poverty).

Besides, in some countries there is no official definition of energy poverty (Finland VCSC), and in others, the existing definitions are incomplete and do not match with the needs (Poland VCSC). Because of the flaws in the definition, partners in some countries are hoping to change the current state-of-the-art: "*Representatives of the Ministry of Energy and Energy*

[15] Bouzarovski S., et al. (2012) Energy poverty policies in the EU: A critical perspective, Energy Policy, Volume 49, 2012, Pages 76-82, ISSN 0301-4215, https://doi.org/10.1016/j.enpol.2012.01.033

Regulation Office stated that a special government task force has been launched recently to address the definition issue and propose a new wording. It is likely the proposal to be consulted with the NGOs and industry." (Poland VCSC)

Some definitions are based on low consumption and income thresholds that are not sufficient for a decent life (ES). Such definitions usually target too narrow groups, or a relatively small number of vulnerable consumers (BE). As a result, the measures to tackle energy poverty are not available to all the people in need.

Another important shortcoming of those definitions is their focus on financial assistance to the identified poor consumers. "*This focus determines strong dependency of the scale of energy poverty on the general level of poverty and the general system of social protection and simultaneously excludes important causes and consequences of the issue*." (Spain VCSC) As a consequence, the scale of policy interventions is also reduced. Therefore, at least in some countries, such "*definition can be useful for social-aid purposes, but not for prevention*" (Poland VCSC).

Participants stressed "the importance of having a clear and comprehensive framework on energy poverty at the European level, based on a common definition and clearly presenting the structural causes of energy poverty and the appropriate measures tackling those causes and the different levels of decision-making involved." (EU VCSC)

1.2. Scope of measures against energy poverty

A European Parliament study on Competition Policy and Internal Energy Market[16] mentions several policy instruments devised to combat energy poverty in EU Member States:

- Financial support of (low-income) households (e.g. Bulgaria, Ireland);
- Provisions through the social security system and advice on measures to reduce electricity consumption (e.g. Germany);
- A social tariff for customers with specific social characteristics and a 'free electricity' quota for households with energy debts (e.g. Greece);
- A lump sum contribution to vulnerable consumers (e.g. Italy, France);
- Measures to enhance the thermal efficiency of buildings (e.g. Ireland);
- Social subsidies, VAT and other tax reductions and agreements with energy companies to avoid disconnecting supplies for households which defaulted on their energy bill payments (e.g. Poland).

Research conducted by ASSIST[17] recognises financial interventions as a fundamental instrument to support vulnerable consumers "*since a lack of finance is one of the key factors for all people in energy poverty. Nevertheless, it has a tendency to focus on short-term relief and does not address some of the other fundamental factors involved in energy poverty […] The majority of Member States offer some kind of financial intervention for those who are*

[16] Directorate-General for Internal Policies. Policy Department (2017), A Competition Policy and an Internal Energy Market, Study for the ECON Committee, citing Schumacher et al., 2015, https://www.europarl.europa.eu/RegData/etudes/STUD/2017/607327/IPOL_STU(2017)607327_EN.pdf

[17] ASSIST (2018). D2.5 Vulnerable Consumers and Fuel Poverty Report, https://www.assist2gether.eu/documenti/risultati/d2_5_vulnerable_consumers_and_fuel_poverty_report_final_201805151.pdf

most vulnerable, though it might not necessarily be targeted specifically at paying for the household's energy bill, it might be identified and distributed through a country's social welfare system" (ASSIST 2018: p. 74).

Measure	*Scope*
Measures supporting the payment of the energy bill, based on income criteria	almost all countries
Several financial measures to support the take-up of energy efficient measures by the households which are not specifically addressing energy-poor or vulnerable consumers	almost all countries
"Social organisations economically help people in need who are not able to pay for their energy bills by paying the bills themselves"	IT
"A social tariff for vulnerable customers, a system of free energy scans, cheap loans for energy efficiency investments"	BE
"Training of social workers, energy rehabilitation, corporate volunteering, discount rate (bono social)"	ES

Table 2 - Most frequent policy measures in ASSIST countries

The majority of Members States provide additional measures for consumer protection from the various retail energy markets:

Main policy measures	*Description and Countries*
Protection against disconnection	In many Member States, vulnerable consumers are protected against disconnection, especially during winter (Belgium, Finland, Spain and Greece). In this period of the year, those who are disconnected due to lack of payment must be reconnected. In Spain, this protection exists at all time but is only available to extremely vulnerable consumers, despite some regions such as Catalonia have wider protection against disconnection. In Croatia, this protection is extended to all the recipient of the social welfare register. However, it might not necessarily help those who have only recently entered into economic hardship, such as people who have just lost their job. In some Member States, such as Slovakia, this measure does not exist: the Distribution System Operator (DSO) is simply obliged to warn if a disconnection or an interruption to the energy supply is imminent. In Belgium, a number of steps need to be taken before a household is disconnected, depending on the regions. In Flanders, it supposes that the account is transferred from a commercial supplier to the DSO and the installation of a budget meter.
Social tariff	Several Member States (Cyprus, France, Greece, Spain, Italy and Belgium) have introduced social tariffs, adding a layer of protection for

	vulnerable consumers. However these practices vary – for example Italy has a social tariff for gas and electricity while Spain has it only for electricity.
Improving energy efficiency	For the majority of Member States, energy poverty issues are intimately linked with energy efficiency and the quality of a vulnerable consumer's home. Inevitably, people with low-incomes often live in low-quality rented dwellings because this is all they can afford, and must cope with high utility bills. In parallel, in many Member States, mainly in rural areas, vulnerable consumers live either in particularly old and poorly maintained houses or lack access to energy efficient forms of heating. A large proportion of the housing stock was built before building and energy efficiency codes were introduced (Greece, Slovenia, Croatia, Spain, Poland, Italy, Cyprus, Belgium) and therefore, tended to be hugely energy inefficient. In recent years, the majority of Member States has introduced some kind of retrofitting and energy efficiency loan or grant schemes. However, in general, these measures have primarily been set up for carbon-savings purposes and are open to all, not specifically low-income groups (Greece, Croatia, Slovenia, France, Finland, Austria, Poland, Cyprus, Belgium and Romania). In the case of Denmark, a scheme to exchange old oil boilers for natural gas boilers or heat pumps has been discontinued for financial reasons. Finland, besides the relatively generous system for general social assistance, provides many energy efficiency programs ensuring that energy poverty remains on a comparably low level. The country has recently introduced a new energy efficiency subsidy scheme for households, as part of a national long-term strategy to reduce carbon emissions in the housing sector. However, it is disputed whether this mechanism is accessible for the most vulnerable households. There are also subsidies available for the elderly or disabled aimed at improvements to help them stay in their homes which might mean the subsidies are used for energy efficiency or heating improvements. Finland has also introduced a law to give up oil heating in the housing sector. The decision affects a group of households, identified as being in an increased risk of falling into energy poverty. Ministry of Environment has recently set a working group to understand all implications it may have for the vulnerable consumers. In some Member States, the energy efficiency and retrofitting programmes are funded at a local level through municipalities (Lithuania). Barcelona, for example, provides financial incentives for the renovation of properties and in the case of vulnerable consumers it can cover up to 100% of the costs. Other renovation programmes are focused more specifically on providing energy efficiency measures for the homes of more vulnerable consumers (Czech Republic). In Belgium, there is a 'social renovation' grant for private dwellings on the rental market that are below a certain

	rental price. In the UK, the government manages the ECO scheme – a requirement upon energy companies to invest in energy efficiency measures for vulnerable households.
Information and advising	The majority of Member States have some form of information provision on energy consumption and energy-efficiency. Some countries (Greece, Slovakia) provide such information on a project-basis. For instance, humanitarian, voluntary groups and NGOs provide advice to vulnerable consumers, but usually there are no public services. On the other hand, Finland, Spain, Denmark, the Czech Republic, France and Italy provide energy advice through energy advice centres. Often, web-based services are not necessarily targeted at vulnerable consumers or designed for them. In Finland, energy companies are entitled to communicate energy efficiency for their customers through the energy efficiency agreements with the Ministry of Employment and the Economy. In certain Member States, advice is much more targeted. Both Slovenia and Belgium provide energy advice through networks of home energy advisors whose central role is to support vulnerable consumers. Similar initiatives take place in the UK, the BESN[18]. UK's VCSC's participants added several national and local initiatives and projects, showing a link between the initiatives that offer financial assistance and those offering advice and support. The UK experience suggests that different services provided by local organisations, besides policy measures at national level, are possible and necessary. Many of the projects and schemes that offer advice and support to vulnerable consumers also play a role by helping consumers gain access to financial aid. However, advisory projects generally rely on locally-sourced funding (such as local councils), which is an unsustainable situation "*given the cuts in public spending currently being experienced in the UK*" (UK VCSC). In the framework of national and local initiatives and projects, UKs participants mentioned the following activities: energy-saving and efficiency advice; help to access grants for insulation or providing information about renewable technologies; assistance in switching energy tariff or supplier; help to find local installers and trades people; free home energy visit; training for 'front-line' staff in recognising the signs of energy poverty in consumers' homes. In Flanders, Belgium, similar services are provided by social economy organisations ('energy cutters') in the context of the system of the free energy scan.
Strong welfare	In Finland, an original and specific link between different measures

[18] See • Citizens Advice (2020), Big Energy Saving Network and Big Energy Saving Week 2019/20. Retrieved from https://www.citizensadvice.org.uk/about-us/how-we-provide-advice/our-prevention-work/BESN/. Last visited on 29 May 2020

system	against energy poverty and the level of social protection stands out. As Finnish participants suggested: "*There is no official definition of energy poverty or vulnerable consumers in energy markets in Finland*" (Finland VCSC). However, Finland has one of the most effective welfare systems, designed to guarantee adequate living conditions and capable to cope with energy poverty. Therefore, instead of special policies addressing energy poverty, other types of measures address equivalent risks. This can explain why despite the lack of special definition the level of energy poverty in Finland remains low.

Table 3 - Main policies measures against energy poverty

In summary, findings suggest that the main measures for energy poverty alleviation are directed at the adaption of the incomes (through financial assistance) and energy expenditures (through reduced consumption) of energy-poor households to the dynamics and the levels of the energy prices. It can explain the dominance of the two main types of measures that are implemented to alleviate energy poverty: financial support and energy-efficiency measures to limit consumption and reduce energy expenditures. The list of measures also suggests that the other critical factor of energy poverty, energy prices, remains outside the scope of the measures applied and/or is inadequately addressed. This is true even in the countries with mixed approaches, for instance in Belgium where the so-called "social energy tariff" enables vulnerable customers to receive the cheapest price available on the market. Obviously, this scheme also supports low-income consumers, and "adapts" their insufficient solvency to the (high or rising) energy prices, by providing them access to a segment of lowest prices.

1.2. Assessment of the effectiveness of policy measures for vulnerable consumers protection

1.2.1. General remarks concerning the policies for energy poverty alleviation

According to ASSIST's partners, the underlying causes of energy poverty are, overall, not well identified and, therefore, the measures applied do not address some of the root causes of the risk. Many participants find the measures against energy poverty not effective enough and several arguments for this are provided.

Measure	*Concern*	*Arguments*
Symptom-based approach	Too superficial, does not address the root causes of energy poverty	"*Energy poverty policy is predominantly aimed at alleviating the symptoms of energy poverty, as opposed to tackling the causes at the root of the problem*." (Belgium VCSC). Probably because of the same reason, participants from the UK recommend "*better recognition of the*

		relative impact of the main factors on the level and dynamics of energy poverty: it seems that the impact of the energy prices' dynamics increases and exerts pressure on the system for financial support (assistance) of vulnerable consumers". (UK VCSC) A large majority of legislation and policy at the moment is focused on alleviating the symptoms of energy poverty (and energy prices keep increasing). "*We need more than the price cap from the Government.*" (UK VCSC)
Changing consumer behaviour	Consumers are not responsible for the flaws of the market	Many activities aiming at energy poverty alleviation are focused on vulnerable consumers' behaviour, but participants emphasized that "*The pure consumer approach is limited and flawed. You may have more energy-poor because of the level of prices and purchasing power. We have had the same discussion for 15 years*". (EU VCSC) This opinion is in line with another opinion suggesting that policy formulation process should not put too much "responsibility" on consumers but should focus more on ensuring that regulations target energy suppliers.
Financial aid	Levels are insufficient	UK's participants mention a problem that seems to be common for almost all participating states: "*Many of the existing schemes concentrate almost exclusively on financial aid to those consumers who meet certain criteria related to low-income and/or energy poverty*". (UK VCSC) The current policies are mainly focused on the assistance of consumer and do not tackle the real causes of the problem. (Spain VCSC)
Silos among policies	Energy poverty should be understood in the broader framework of a right to energy	According to certain participants, the bottom line is that the design of current measures does not consider the energy as a right. (Spain MAD).

Table 4 - Criticisms against the main policies

These opinions deserve great attention, because they question, although indirectly, the correct identification of the main factors of energy poverty and as a consequence, the accuracy of the solutions brought to these factors. Obviously, if addressing the root causes is not precise, it could be a fundamental issue of the policies for energy poverty alleviation. The effectiveness of each policy depends largely on the degree the measures implemented address the root causes of the risk that the policy aims to neutralize. If the root causes are not addressed, the effectiveness of policies for energy poverty alleviation cannot be high,

even if their impact is assessed positively (by comparing the current level of energy poverty and the expected level if the measures are not implemented).

1.2.2. Addressing the root causes of energy poverty

The partners of the project ASSIST acknowledge that when the policy measures fail to address the root causes of energy poverty (as opposed to the symptoms), measures cannot be effective enough. That is why some participants "*welcomed the very idea of tackling the root causes of energy poverty*". (UK VCSC). Workshop participants suggested also that policies and measures should focus on the structural causes of energy poverty instead on the consequences (Belgium VCSC).

Country	Opinion
Spain	The members of the Spanish steering committee agreed that the current policies in place to tackle energy poverty in Spain are not sufficient and do not respond in an appropriate manner to enhance the situation of the vulnerable energy consumers. "*The measures in place are partial – they don't address the problem and its causes as a whole*". (Spain VCSC).
Italy	The "*drivers of energy poverty are not really addressed by current policies. Current policies do not respond to the needs of energy-poor consumers*". (Italy MAD) "*A holistic approach is needed to analyse the causes of energy poverty and to design policies to reduce it*" (Italy VCSC)
EU	"*We need to look at the root causes – why are energy prices so high in EU today. Since we start liberalising, creating an internal market in the energy sector – prices have increased. The logic behind the liberalisation process that started 20 years ago should be discussed. This logic should be questioned. Is liberalisation the most efficient policy framework and regulatory framework to ensure affordable and accessible energy for EU inhabitants?"* (EU VSCS)

Table 5 - Do current policies address adequately the three basic causes of energy poverty: prices, incomes and quality of buildings?

Results of ASSIST research also confirm the above-mentioned opinions. Citing INSIGHT_E[19] and adding non-take up, ASSIST's Summary of the National and European measures addressing vulnerable consumers and energy poverty[20] mentions the following factors of energy poverty:

- The rate of energy price rises versus income growth;

[19] Preston et al, 2014 taken from Pye, S, Dobbins, A, *et al.*, Energy poverty and vulnerable consumers in the energy sector across the EU: analysis of policies and measures, London: INSIGHT_E, 2015.

[20] https://www.assist2gether.eu/documenti/risultati/report_on_national_and_european_measures_addressing_vulnerable_consumers_and_energy_poverty.pdf

- Ability to access cheaper energy prices
- Household energy needs
- Efficiency of energy use
- Policy interventions
- Reluctance to ask for help

Particular attention needs to be paid to the rate of energy price rises versus income growth and policy interventions. The first one suggests possible problems related to dynamic of energy prices (and as a consequence – the performance of energy market) and the dynamic of incomes, including social benefits. The second one suggests possible insufficient effectiveness of policy interventions.

1.2.3. Neglected causes of energy poverty

Besides missed identification of certain root causes of energy poverty, many VCSCs' participants underlined that some of the underlying causes of energy poverty remain overlooked.

Neglected causes of energy poverty	*Justification*
Rising energy price	Electricity costs are on a continuous upward trend in Europe
Evolution of energy markets and the energy transition	Distorted competition Levels of taxes and levies on energy invoices, incl. to finance the energy transition Sector-specific policy inconsistencies
General level of employment, incomes and social protection	Inconsistent social policies High levels of unemployment Too low or no minimum wages
Lack of policy consistency (tax policies, employment policies, social policies, etc.)	Austerity measures Lack of integrated approach or meaningful collaborations between different policy fields and stakeholders
Ownership structure in housing and energy production	Public ownership of infrastructure and generation could help balance the costs and the balance of powers
Gaps in knowledge and "evidence-based policies"	Lack of evidence and data Lack of awareness
Poor adequacy of the policies and targeting of the households affected by energy poverty	Financial amounts are too low Policies target only part of the problem (e.g. housing quality is neglected) Definitions and criteria to get the help are too narrow
Coordination and communication issues	Stakeholders of the social and energy sector understand energy poverty differently and rarely coordinate their work

Table 6 - Neglected causes of energy poverty

1.2.3.1. Rising price

According to participants in different forums, one of the most often neglected root causes of energy poverty are increasing energy prices. Participants pointed out that "*There are no political measures tackling directly the high prices of the energy. Furthermore, the energy pricing system lacks transparency for the majority of stakeholders*" (Spain VCSC**). "***The energy price is insufficiently anticipated by the policy, for example, the calculation of renewable energy. Pure energy prices have fallen, but customer costs have doubled in the past 10 years. Energy bill has become much more complex and unclear. This note affects also the coordination between policies to tackle poverty and sectoral (energy production) policies*" (Belgium VCSC).

The need of such an approach is supported by data - electricity costs are on a continuous upward trend in Europe, according to some analyses. For instance, in 2017, the average

residential consumer's electricity price was 20.4 cents per kilowatt hour [cents/kWh], which is an increase of 23% compared to the average price 10 years ago (16.6 cents/kWh)[21];

As summarized in a 2016 report: "*In the period between 2008 and 2015, retail prices for electricity and gas have generally increased, with the exception of gas in industry which shows a slight decrease in the statistics […] The analysis of energy expenditures in households is split by income levels. In every European Member State, the increase of the retail prices of electricity and natural gas has the largest impact on households with low-income*"[22] (Ecofys 2016: 4)

Thus, "*except for a few countries, energy expenditures have increased between 2008 and 2013, and in many countries, this increase has been substantial. In ten Member States, household energy expenditures have increased by 10% or more from 2008 to 2013. In Spain and France, the expenditures have even increased by more than 20%. The average electricity price paid by European households has increased with 15% from 178 € / MWh in 2008 to 205 €/ MWh in 2014*". (Ecofys 2016: 79)

1.2.3.2. Driving forces of the price dynamic: the evolution of energy markets and the energy transition

The focus on the impact of prices raises another question: If energy prices dynamics is a factor of energy poverty, then what are the factors of energy prices' dynamics?

Some studies emphasize that energy poverty is a market failure and warrants state intervention.[23] Yet, recognizing the link between energy poverty and (energy) market failures, the same study suggests that a Member State intervention should not distort competition on the energy market.

This view avoids the question: does competition exists and works effectively and raises a simple reflection concerning the relationship between market and competition? If competition is a market phenomenon (inseparably connected to the market), then market failure involves also some distortion (perhaps even failure) of the very competition. Then if the competition is more or less distorted in cases of market failures, it is not clear why interventions aiming to overcome market failure, should be so careful with respect to competition. Something more, there are indications for distortions and ineffectiveness of competition, for instance – since competition is expected to restrain price increases, high and rising energy prises (one of the main causes of energy poverty) indicate that probably there are problems with competition. Unfortunately, there is no reliable answer to this question, because of the lack of reliable studies of the real level (intensity) of competition in the energy sector and its real impact on the prices of energy production and trade. Besides the belief in perfectly functioning "highly developed energy markets" and competition's regulating strength and its positive impact on prices suggests that policy measures distorting energy market competition, (such as social

[21] Strom-Report Blog (2018) Electricity prices in Europe – who pays the most? https://strom-report.de/electricity-prices-europe/ last visited on 31 May 2020

[22] Ecofys (2016) Prices and costs of EU energy https://ec.europa.eu/energy/sites/ener/files/documents/report_ecofys2016.pdf

[23] European Parliament (2017) Directorate General for Internal Policies, Policy Department A. Competition Policy and an Internal Energy Market - study concept and preliminary results – Study for the ECON Committee. https://www.europarl.europa.eu/RegData/etudes/IDAN/2017/602020/IPOL_IDA(2017)602020_EN.pdf

tariffs, limitations on disconnections due to non-payment and Member State control or capping of retail prices), should be avoided. The problem with this belief is that at least in some cases markets are not highly developed and competition is weak if it exists at all. In such cases the concerns about "distorted competition" seem to be misleading.

Some analyses of the increasing retail prices of electricity and gas over the last decade depict that a significant amount of the factors determining the dynamics of energy prices are not market-related - prices are strongly influenced by non-market factors. More concretely, providing disaggregates of the main drivers in retail costs for electricity and natural gas considering the three components: energy, network, and taxes and levies, an analysis concludes:

> "S*ince 2008, the taxes and levies component has increased for electricity […] These payments add to the energy and environmental taxes that are paid on the use of energy in Europe. In most countries and for most energy uses these excise duties have been constant for the whole period from 2008 to 2015. Value added taxes on household retail prices are applied as percentages of the total retail price, including on the sum added by all other taxes and levies. Their nominal effect increased with increasing total prices […] The decrease of 11% in total household energy consumption in Europe between 2008 and 2014 was not sufficient to compensate for the increase in energy retail prices. Hence, annual expenditure on energy for European households in this period has risen in nearly all Member States, with a significant variation between, and even within, countries."* (Ecofys 2016: 6)

Based on this data, some **analyses and positions point to the various policies in the field of energy production as an energy poverty factor**:

> "*Technological progress has meant that costs for electricity generation have declined over the past years. The consumer has not benefited from this because the decline has very often been outweighed by taxes, grid costs and so on. This constitutes a serious problem because it has negative impacts on energy poverty*."[24] (EESC 2017: 10).

If the dynamics of energy prices is significantly influenced by the taxes and levies component, this raises a further question: what is the reason for them to rise? The issue is controversial and not all participants in ASSIST share the same view. But whatever the differences, it can obviously be assumed that the increase of the taxes and levies and the impact of this increase on energy poverty deserve special attention.

Some analyses conclude that the state support for renewable energy sources and combined heat and power (CHP) and the significantly higher prices of energy from renewable sources, largely contribute to rising energy prices and poverty. Data (at least in some cases) seem to support this conclusion. According to press data in Bosnia, for example, the state is giving producers of energy from renewable sources at 8-9 cents per kilowatt-hour, which is three times the average price of electricity. In Bulgaria, the price of electricity, produced from renewable sources is in some cases seven times higher than the lowest prices of energy. There is no doubt that such differences contribute to the increasing prices of electricity and the level of energy poverty.

[24] European Economic and Social Committee (2017) European Energy Dialogue "Clean Energy for All Europeans" package, https://www.eesc.europa.eu/sites/default/files/files/qe-01-17-782-en-n_0.pdf

Probably the situation in other Member States is similar and this has led to the following summary:

> "*Governments should be aware of the fact that rising taxes and levies on energy use, increases "energy poverty". As far as possible, customers' bills should reflect the market-based cost of energy and should not be a vehicle for financing other – sometimes totally unrelated - policies. A progressive method of funding of policy measures (environmental, social etc.) is through general taxation: this approach ensures that consumers with low-incomes and below the tax thresholds are not required to contribute, but can still access and benefit from these policies."*[25] *(Eurelectric 2017: 8)*

Some of the reasons for producing non-competitive energy are the legal norms for subsidizing 'renewable energy sources'. Without these legal norms and the subsidies granted, construction of such plants probably would be slower. Some of VCSCs' participants underlined that there are "*inconsistencies in the legislative framework and there is a need for clear legislation that enhances citizen's rights and entitlements*." (Spain VCSC)

Other participants in the ASSIST project disagreed and emphasized that the cost of producing renewable energy "*is now generally lower than fossil fuels, but due to different fossil fuel subsidies and initial investment costs, this is not yet reflected in bills".* For these participants *"renewables are not more expensive and harming the poor, but a part of the solution to lower and more stable prices*".

Despite these differences, the suggestion of UK participants is relevant: "*As the energy poverty increases at an EU level, it is important that new policy is aligned closely to the transition to cleaner energy. A large majority of legislation and policy at the moment is focused on alleviating the symptoms of energy poverty, but members welcome the idea of tackling the root causes of energy poverty. Could this be done whilst also now aiming for drastic reductions in carbon emissions? It is vital that a transition to clean energy is carried out in an equitable fashion and it is not the most vulnerable in society that are left behind*" (UK VCSC).

An important aspect related to the same issue is the much faster rate of transition to renewable energy production, compared to the rates of consumers' incomes growth and poverty reduction. When the growth of energy production from renewable sources is much faster, it can reduce the effects of the policies to tackle energy poverty. As stressed by Finnish partners, even in Finland with its strong welfare system, which is far more advanced than in many other countries, the social security payments do not solve the root causes of energy poverty.

The mutual influences mentioned above seem to indicate the existence of a certain inconsistency between policies stimulating the transition to renewable energy sources and the policies to tackle energy poverty – the second type of policies are usually not able to cope with effects of implementing the first type of policies. This policy gap could be part of the explanation of the low effectiveness of the anti – energy poverty policies.

The conclusion is not that the transition to renewable energy sources should be halted, but that there is a need of much better coordination between different policies and a need of

[25] Eurelectric (2017) Energy Poverty: a Eurelectric Position Paper http://www.eemg-mediators.eu/downloads/Paper_on_Energy_Poverty_-_May_2017.pdf

careful evaluation of the consequences of implementing different policy measures, limitation of ”rent seeking" in the energy sector and better alignment of economic, environmental and social targets. “*Further efforts need to be made to integrate energy efficiency and renewability in energy poverty debate*.” (EU VCSC)

1.2.3.3. General level of employment, incomes and social protection

As participants suggested, energy poverty largely depends on the level of employment, quality of jobs, incomes (wages, social benefits) and redistribution through the tax system. For instance: “*Minimum wages are too low (below poverty line). Debate about taxation is needed, wealth tax is necessary*” (e.g. fiscal measures are for the well-to-do class, tax benefits for electric vehicles (Belgium VCSC).

Essential aspects such as the “*families' low-incomes, their access to good quality employment or an effective regulation of the energy prices are not usually taken into account in direct relation to energy poverty*” (Spain MAD). “*Low-income is an issue as many people with disabilities do not have the opportunity to increase their income through work*” (UK MAD).

Vulnerable consumers often lack resources to renovate their homes and installing energy efficient systems. That is why **“**p*overty should be tackled in general and energy poverty is part of this. It makes no sense in tackling energy poverty as an isolated problem. Not only in the energy but also in the social policy domain an important effort has to be made*” (Belgium VCSC).

1.2.3.4. Policy consistency

Another neglected cause of energy poverty is the weak coordination of different policies. There are gaps and overlaps between policies in different fields such as tax policies, employment policies, social policies (especially austerity measures and the so-called retrenchment of the welfare state). Policies aiming at alleviation of energy poverty and policies for the transition to clean energy (aiming for drastic reductions in carbon emissions) do not necessarily take each other well into consideration. Meanwhile, the use of energy increases permanently and this means increasing production of energy that could come mainly from renewable sources, where prices usually are higher.

The impact of the tax system is important but also seems to be overlooked: *“the reason for high bills is the component of system charges, which essentially constitute by a sort of flat tax, not being progressive*” (Italy VCSC). Participants mentioned also specific “*Matthew effect” – “only 1.3% of the distribution cost is for social public service obligations, but people in poverty do pay for green energy*” (Belgium VCSC).

Some participants emphasized that “*inconsistencies in the legislative framework and the need for clear legislation that enhances citizen's rights and entitlements.”* (Spain VCSC) Participants suggested that there is no integrated approach or meaningful collaborations between different policy fields (“*indeed policymakers should be working together*”). “*Each need to climb outside of their comfort zone. Climate action is a good opportunity to bridge social justice and environmental concerns -- what lacks is the political recognition of these links and the will to act ambitiously*”.

1.2.3.5. *Ownership structure in housing and energy production*

Participants in discussions suggested that a change of ownership structures in housing and energy production could warrant more political attention and generate significant anti-energy poverty impact and adequate measures. Public ownership of housing, for instance, could be used to encourage renovation without increases in rents. The ownership structure in energy production and trade is also an important factor in energy poverty. Given the low prices of renewable technologies and with an adequate regulatory framework that permits self-supply and local energy trading, decentralised, collective ownerships of energy supply installations, possibly with funding by municipalities, could allow vulnerable consumers to produce and self-supply energy. No doubt – such measures would have a significant anti-poverty impact.

1.2.3.6. *Gaps in knowledge and "evidence-based policies"*

Lack of important research/knowledge is a barrier for evidence-based policies: although research is being carried out, "*diagnosing the phenomenon is stiff*" (Poland VCSC). Some important causes of energy poverty are not identified and due to this they are not addressed by direct and strong policy interventions. This could explain the insufficient effectiveness of the policy measures that are implemented as well as the persistence of energy poverty.

"Receiving hard, reliable data is difficult." (Poland VCSC and MAD). **"***There is too little knowledge about energy, which means that there is a wrong attitude, for example, with regard to composition rate*" (Belgium VCSC). **"***More investigation is needed on what the impact would be of adapting the allocation criteria and the decision-making process*" (Belgium MAD). "*The awareness level of the consumers is insufficient and direct consultancy/advice is strongly needed. Consumer education and access to knowledge sources can be the common factor for all market stakeholders, including consumer organisations, administrations, utilities and consultancy agencies*." (Poland VCSC); "It seems that insufficient information (probably connected to weakness of communication) can explain why financial instruments available for energy-efficiency improvements are in general not taken up by some of vulnerable customers." (Belgium VCSC) and why some of the consumers believe that the installation of a budget meter stigmatizes the customer. "*Challenge of communicating the main changes in the regulation related to energy rights and vulnerability*" (Spain VCSC).

1.2.3.7. *Poor adequacy of the policies and targeting of the households*

When policy measures address the identified drivers of energy poverty, their impact is often not enough to cope effectively with energy poverty. That is why another concern of participants is the adequacy of measures, e.g. "*the level of basic welfare to cover necessary costs and whether or not the social security measures reach everyone in need*" (Finland VCSC). In Italy there are concerns regarding hidden energy-poor consumers: "*in particular, those disconnected to the grid – thus not able to even request the bonus – especially with regard to natural gas and the risk of excluding a big part of the energy-poor consumers, if specific actions for disconnected are not planned*" (Italy VCSC). In the UK, there are

concerns linked to the same "internal" weaknesses of the mainstream policy interventions – low level of support (benefits).

Participants from Italy mentioned that **"***The current policies do not seem to have a strong impact on the three drivers of energy poverty: prices, incomes and quality of buildings: the energy bill is still particularly high for consumers; the financial support for energy-poor (especially large families) is not able to tackle energy poverty; energy efficiency of social housing is low*. (Italy VCSC)"

These assessments are confirmed by other participants: "*Our housing isn't being properly addressed by policy*". "*new buildings have regulations but we have a vast majority of old build (pre 1919). Funding is not sufficient for the insulation of the old buildings*. *Legislation has lots of loopholes. Old properties are exempt from improvements* (UK VCSC). Although financial aid is the main pillar of consumers protection, very often it is not enough, as Polish participants suggest: "*lack of adequate financial support targeting vulnerable consumers (except energy supplement and supplement for housing) as well as poor conditions of residential buildings and the need to carry out thermo-modernization, which requires large financial outlays*." (Poland VCSC) It seems also that "*the current system of measures is weighted too far towards tax funding or short term financial help, with less financing of long term programmes to make lasting changes to the housing stock and peoples' long term warmth*". (UK VCSC)

There are not enough policies aiming to improve the efficiency of the buildings, nor to install self-supply systems or to optimize domestic climate and energy installations. "*The electric social discount is not enough and there is no social aid directly addressed to the refurbishment of buildings.*" (Spain MAD)

Some VCSCs' members stressed weaknesses of identification of the target groups. In more concrete terms: "*The way energy poverty is identified, does not reflect the current situation and excludes households with an average income but very high energy costs*." (Poland VCSC) "*It is recognised that accurately targeting measures at fuel poor households in England is difficult as the number of households in fuel poverty is a statistically derived number.*" (UK VCSC).

1.2.3.8. Coordination and communication issues

Participants suggest that there is a "*need for better coordination by the different stakeholders involved: public administration, social and private sectors*" (Spain VCSC); "*Slow implementation; main burden of implementation is put on local administrations that don't have enough resources*." (Spain VCSC) Problems of coordination between the general social protection system and energy policies (financial support in cases of energy poverty) are also mentioned. UK members raised the question: "*How can we combine strengthening the general social protection systems (reducing general poverty) and further development of special measures tackling energy poverty?"(*UK VCSC).

Besides, there are differences in the understanding of the phenomenon between the social and the energy stakeholders.

Different interests motivate the stakeholders in the social sector and the energy sector and it is not an easy task to overcome the differences. In most general terms participants describe divergences in the following way: If energy efficiency increases, revenues for the energy

sector decrease. It is the task of the government to keep this under control. A "social energy sector" is needed. (Belgium VCSC). "*Of course, there will always be a division between the social and energy stakeholders due to the tension between profit v/s social responsibility*" (Spain VCSC) and "*the paradoxical situation that in helping to improve the energy efficiency of properties, the amount of energy required from the suppliers will reduce, thus affecting the profit of the energy suppliers in a negative way*" (UK VCSC).

Different interests generate important difficulties for the policies aiming at energy poverty alleviation. First of all, stakeholders understand in different ways the causes of energy poverty and – as a consequence – they have different visions on the policy measures that have to be implemented. The critical evaluations of participants on the effectiveness of measures against energy poverty show that there are likely to be some problems in the formulation of the measures (their potential to address the root causes of energy poverty). Such problems with effectiveness of the policy measures largely arise due to significant differences in the views of the various stakeholders involved in the political decision-making process.

The main point on which the social and energy stakeholders disagree relates to the relative impact of the main factors (causes) on energy poverty and more precisely – the impact of energy prices. Especially in unfavourable social contexts prices of energy (compared to the levels and dynamics of incomes) are relatively high.

Another version of the above-mentioned difference between social and energy stakeholders appears in their understanding of the most important causes of the risk of energy poverty: "*Energy sector focuses on the technical aspects of the issue, while the social entities concentrate on the origin of the problem: the economic inequality and its impact on the families' capacity to meet their energy basic needs*. It would be great to have a professional profile with both technical and social knowledge to have a big picture of the complexity of the problem and be able to apply long-term solutions" (Spain VCSC)

Although in different formulations the same difference appears in the other countries, participating in the ASSIST project. "*Energy sector stakeholders highlight the fact that electricity has relatively low cost in Finland. Social stakeholders in turn highlight that the feedback and experiences they are getting from consumers – that rising housing costs, electricity, especially electricity distribution being among them, is a problem for people*." (Finland VCSC). "*In Italy energy poverty has only recently gained importance, in 2017 the term was introduced in the national energy plan for the first time. As such stakeholders working in the energy sector are more acquainted with the term and meaning of energy poverty in relation to the stakeholders in the social sector who are still mostly unaware of the social phenomenon*." (Italy VCSC) "*The views of the stakeholders differ on the evaluation of the parameters of energy poverty in Italy, with social sector and consumers associations preferring a wider approach with focusing more on prices and market behaviours, and energy sector more focused on the technical aspects*." (Italy VCSC)

In Poland, the presence of a multi-perspective vision on energy poverty is also mentioned. *"The Administration seems to be focused on legal and administrative measures to tackle energy poverty, such as public aid for energy-poor and programmes aimed at improving energy efficiency. However, they signalized the problem of long-term financing and complicated structure of housing ownership (especially in case of municipalities owning whole or part of the buildings in bigger cities). Industry representatives stressed the need of linking energy poverty and energy efficiency with consumer safety, and safety of the energy*

system itself (blackouts, deficits of power and the need for tools for consumers to save energy in rush-hours). Social representatives put their attention on the behavioural issues and consumer advising and education." (Poland VCSC)

Participants agreed on the identification of one of the main causes of energy poverty, namely – the general social and economic context:

- high level of general poverty (large low-income groups),
- weak social protection (and the relevant policies such as retrenchment of welfare state; austerity measures);
- unemployment and underemployment and connected effects – such as poor dwellings, etc.

Such common view acknowledges that energy poverty is caused and could be addressed through measures originating in other policy fields, for instance housing. In this way some other policy fields, such as building regulations, urban policy, and others, could be included in the list of policy interventions against energy poverty.

This suggests that it is possible to overcome divergences between different stakeholders. An example confirms these opportunities. In the UK "*the government made efforts to include the main players in the energy sector in the elaboration of measures to alleviate fuel poverty. This has resulted in schemes such as the Energy Company Obligation (ECO) and the Warm Homes Discount. Ofgem, as the regulator of the energy market in the UK, holds regular round tables and working groups with representatives from the energy industry, consumer groups and fuel poverty groups*." (UK VCSC)

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1.3. Summary of the results of the assessments of policy measures for vulnerable consumers' protection: State of the policy cycle's stages.

The assessments of policy measures to protect vulnerable consumers provide bases for a larger assessment of the policy cycle[26] as a whole. Below is presented the description of the different stages of the policy cycle, based on the assessments, provided by ASSIST participants.

Stages of the policy cycle	*Justification*
Risk identification	The risk of energy poverty has been identified as a socially

[26] The concept of a political cycle distinguishes several main stages of the political decision-making process: identification of the problem (the risk); problem analysis and identification of its root causes; formulation of policy measures; implementation of the measures; assessment of the effects of policy measures and possibly - redesign of the measures. See for example: Werner and Wegnich, 2007; May and Wildavsky, 1978; Howlett, Ramesh and Perl, 2003; Bridgman and Davis 2003.

	significant risk; it has received political recognition and is somehow included in the political agendas of many EU countries. A complex of policy measures is in place to address risk.
Analyses of the risk and identification of its root causes	Reliable knowledge which identifies basic causes of the risk is not enough. Some important causes of energy poverty are not identified and their impact is not adequately assessed. For example, there is a need of reliable assessments of the impact of such factors of energy poverty as the general state of the social protection system and its dynamics (in particular austerity measures and the "retrenchment of welfare state"); the level and quality of employment; the state and dynamics of energy production (in particular electricity); the state and dynamics of the energy market (regulation / deregulation of the market; competition / monopoly structures), etc. Reliable data on the impacts of these factors on energy poverty are relatively scarce, and it can therefore be concluded that there are significant "white spots" in the studies of energy poverty causes. If the impact of the mentioned factors is significant and unfavourable (for some of them, this is almost certain), this means that probably significant factors of the risk of energy poverty are not addressed by energy poverty mitigation policies.
Formulation of policy measures that address the causes of the risk	Some countries do not have basic policy tools: a definition of energy poverty, (and there is no common European definition) and a complex of adequate indicators. The most widespread and most significant measure – financial support to individuals and families at risk of energy poverty is aimed at mitigating the effects of the risk, not its root causes
Implementation and enforcement	Assessments concerning the state of this stage seem to be somehow more favourable, but they also suggest there is room for improvements: collaboration between main stakeholders faces barriers – differences in the opinions of social and other stakeholders (which is connected to available knowledge and information); administrative burden, need to facilitate the application process and automatic allocation, "*in order to make it available to all potential consumers within the thresholds*." (Italy VCSC)
Evaluation	Sound evaluations of policy measures against energy poverty are rare, partial and limited. Evaluations of the type of participatory research (with the participation of civic entities and the energy-poor themselves) are largely missing.

Table 7 - Stages of the policy cycle

The "formulation of policy measures" stage is clearly affected by the weakness of the risk analysis: disposable knowledge does not provide solid basis for "evidence-based policy". As a result, measures implemented do not address some of the root causes of the risk. The extent of the impact of the implemented measures on the causes they address is often

assessed as insufficient (the resources allocated are insufficient). Alignment of energy poverty reduction policies with other policies (for example: employment policies, austerity policies, sectoral (energy production) policies, energy market regulations, environmental policies) is not enough complete. Thus both the scope of the measures (probably not addressing all the important risk-generating factors) and the strength of their impact on the causes of energy poverty covered are not sufficient to effectively deal with the risk and eradicate energy poverty.

Policy	*Overall assessment of policy measures in ASSIST countries*
Risk identification	Energy poverty is a significant social risk
Root causes	The root causes of energy poverty, that lay in the general the functioning of the national economic and political systems, the welfare state, the housing and energy markets, are not consistently addressed
Policy Silos	Lack of integration of different policies and coordination between stakeholders are preventing the development of good policy-making on energy poverty.
Enforcement	Existing policy measures are not sufficiently enforced.
Evaluation	A systemic evaluation of the energy poverty mitigation policies is missing.

Table 8 - Assessment of policy measures

Summarizing the results, it is important to underline again that the different EU countries and different regions in them have progressed at different paces. Concerning ASSIST partner countries in particular, the following could be summarized as such:

Finland has a comprehensive welfare system and energy poverty is "*on low level due to the fact that secure energy services are considered as an essential minimum service that the public sector and energy companies have to secure for the Finnish citizens for maintaining legitimacy*". In this regard "*handful of more general renovation, energy efficiency and social welfare policies were considered more efficient and inclusive, than measures designed only to alleviate energy poverty*" (Finland VCSC)

The UK is characterized by perhaps the longest-running system of elaborated measures targeting energy poverty. Still reverse movements including in the identification are not excluded and on regional level Scotland is appreciated as having "*the strongest policy when it comes to energy poverty… In England, where the UK's VCSC members operate, it was felt that the policy could have been more explicit in terms of fuel poverty reduction, rather than simply outlining targets to reduce poorly insulated and energy inefficient properties*." (UK VCSC)

Flanders, Belgium is considered "*good in defining energy poverty and there are several good policies and measures against energy poverty in place*" Among the good practices the "*poverty checks*" – participative assessment of the impact of policies and measures on energy poverty is pointed out. Still the necessity "*to strengthen these processes and to focus on the structural causes of energy poverty instead on the consequences*" is underlined. (Belgium VCSC)

In Barcelona, Spain also some measures are considered good practices. "*The social bonus is a valuable measure to aid vulnerable consumers*.", "*Energy poverty Alliance in Barcelona*

provides the space, including for people who have experienced energy poverty." However, most of the measures are assessed as palliating the consequences of the issue and not tackling the real causes of the problem. "*The current policies in place to tackle energy poverty in Spain are not sufficient and do not respond in an appropriate manner to enhance the situation of the vulnerable energy consumers. The policies should be reformulated and redesigned with the perspective of the energy as an essential right and should take into consideration important aspects such as low family incomes or new energy prices' policies so that they could be effective*." (Spain VCSC)

In Italy, as already mentioned "*energy poverty has only recently gained importance… Work by RSE and Banca d'Italia on the fact that energy poverty is a phenomenon related to many interwoven parameters and therefore it cannot be related directly and exclusively to the income of the household (which is the criteria used nowadays in Italy for the eligibility of the economic support to the energy bill)… A definition of energy poverty needs to be drafted taking into account all the different aspects related to energy poverty: climatic, economic and social. The causes should be in fact clearly identified in order to be able to impact on the people "at risk" of energy poverty*." The envisaged by the Italian Energy and Climate Plan establishment of a national observatory on energy poverty is appreciated. (Italy VCSC)

In Poland, "*The way energy poverty is identified, does not reflect the current situation and excludes households with an average income but very high energy costs*." It is emphasized that tackling of energy poverty is mostly based on removal of effects, but the system is not prepared for prevention. "*Energy vulnerability support schemes depend a lot from short-term programmes but there are no durable, long-term solutions. Solutions for energy vulnerability and preventing of energy poverty have to be implemented before full liberalisation of energy and gas market (regulated tariffs or social tariffs needed)*." (Poland VCSC)

Part 2: REVIEW AND ASSESSMENT OF PROJECT-BASED INTERVENTIONS TO REDUCE ENERGY POVERTY AND ENERGY VULNERABILITY

Besides policy interventions for the protection of vulnerable consumers in the field of energy poverty, different projects take place in different Member States. Although this distinction seems to be superficial (project-based interventions are tools of policies), the two kinds of interventions have specific features. The analysis of the project-based interventions also helps to understand the lessons learned by the implemented by ASSIST project training – networking – in field action model. That is why here we shortly describe the main characteristics of such project-based interventions.

2.1. Review of project-based interventions

A dedicated desk research of EU projects was carried out by ASSIST[27]. The review and analysis of the projects and initiatives operating through Europe identified a wide range of projects tackling different aspects of energy poverty. The desk research providing ideas of the state, main directions and activities regarding energy poverty and vulnerable consumers' protection through project-based interventions is also useful for analysis and recommendations and contributes to the Framework Paper.

2.1.1. Focus, aims and main activities

With regard to their basic focus the projects reviewed were divided into action projects and research projects. A few of the projects do not feet clearly into this typology as their basic focus is research linked to some concrete activities (for example, accreditation system for professional training)

Research projects

Research projects review and analyse the state of art in connection with energy poverty and vulnerable consumers. Research projects try to contribute to the understanding of the complexity of the phenomenon by focussing on the scale of energy poverty, providing explanations of energy poverty drivers; elaboration of indicators; providing forecasts for future developments etc. Most often energy poverty generators are identified as low level of incomes, high price levels and low housing quality in ref. with energy efficiency. Wider frameworks addressing energy poverty are also in place and further elaborated – for example, the need for comprehensive coordination of many existing policies and, respectively, stakeholders in the field of energy poverty.

Advantages of this approach include formulation of indicators and description of the situation of energy poverty and energy-poor in the different EU countries. Besides, the transformation of research results into political actions and interventions remains problematic, including due to the lack of sufficiently focused efforts in the field.

[27] Assist, D2.5 Vulnerable Consumers and Fuel Poverty Report, 2018 https://www.assist2gether.eu/documenti/risultati/d2_5_vulnerable_consumers_and_fuel_poverty_report_final_201805151.pdf

Action projects

The main aim of most of the reviewed projects is to achieve changes in consumers' behaviour aiming at energy savings, linked with the EU strategy for saving energy (and reducing of energy expenditures).

The accumulation of knowledge on energy poverty seems to be accompanied with some kind of imbalance in the actions and interventions targeting different energy poverty generators. More concretely (although not included into the reviewed projects), there are projects in the field of energy efficiency of homes (while the question of how far these projects address those most in need remains open). Besides there are fewer projects related to the low-incomes as an energy poverty generator and there are almost no projects related to the rising energy prices and their driving forces. Thus, especially the link between incomes and energy prices - that is the purchasing power - as an energy poverty generator remains neglected.

2.1.2. Target groups and their identification.

Projects implement different approaches to identify and address vulnerable consumers. Some do it through existing national social policy and social assistance measures. Such identification is based on the assumption that existing policy measures clearly identify the citizens who need support, such as the people who already receive some support from social services and can be reached through social workers.

The strength of this approach is the clear focus on those users who are already identified by social services as being in need. This strong side is not to be overestimated as the identified group of citizens in need as a rule is smaller than those actually in need (due to the fact that policy measures quite often are not particularly generous, including in terms of eligibility conditions). Another advantage of this approach is that it is the easiest and quickest way vulnerable and energy-poor consumers to be reached.

Weaknesses of this approach are that: existing political identifications are accepted uncritically; attention is not paid to the depth of energy poverty; the scope of the target group and consequently the necessary impacts are reduced, etc.

Another approach is based on addressing all consumers, including among them the vulnerable ones and those living in energy poverty. Within this approach, segmentation of consumer models deserves careful consideration. An advantage of this approach is also that it creates opportunities to define differences between consumer segments, to outline distances and to test hypotheses about different behavioural patterns and strategies.

However, in such projects, vulnerable consumers and energy poverty largely remain aside and secondary issue not addressed with the necessary attention.

2.1.3. Main activities

Although the action projects fulfil a variety of different activities (usually provided by NGOs), the review of the selected projects depicts an almost universal model consisting of several main activities, that usually are components of most of the projects: *information and advising*; *training for energy information and advising; networking*; *other kinds of support*.

Research is also often included in these projects but this activity is subordinated to the basic focus of the other main activities.

Activity	*Strategy*	*Limit*
Information and advising	Debt mediation programme (NL) Direct point of energy assistance (ES) Generic welfare system (PL)	Not necessarily targeted at energy poverty and vulnerable consumers
Training	Specialised training for energy advisers and ambassadors, selected among professionals, social workers, etc. Material targeted at energy poverty and vulnerable consumers	Need to go beyond "energy" and provide training on governance, decision-making etc. to empower social workers and households
Networking	Engagement of stakeholders in working groups	Energy poverty and vulnerable consumers are rarely directly involved
Behavioural change	Stimulate behaviour change	Too much responsibility put on the shoulders of the energy poor/vulnerable consumer

Table 8 - Main activities and strategy

Below is presented a brief general review of the main activities of action projects

2.1.3.1. Information and advising

The most widespread activities are providing information and advising on energy saving behaviour. Often both are closely connected with training - for instance Energy Saving Network trains front-line workers to both spot energy poverty in the vulnerable consumers they work with but also to provide energy advice. In Flanders similar services are provided by social economy organisations ("energy cutters") in the context of the system of free energy scan.

In the Netherlands local support in terms of energy advice is given as part of a debt mediation programme whilst in Spain support appears to be given at a more regional level. A number of Spanish municipalities have been piloting a system called PAE (point of energy assistance), and in Barcelona this means the provision of 10 information points within the city. Any consumer is able to visit these information points for assistance; however vulnerable consumers can receive additional support in terms of switching contracts, changing the terms of the contract or getting help to stop a disconnection.

In Poland there is local support based on the welfare system, but it is not focused only on energy and energy poverty. Still in a lot of municipalities, local government support vulnerable consumers and all of their energy efficiency action.

2.1.3.2. Training for energy information and advising

There is a growing development in the field of training. The reviewed projects depict the availability of a wide range of training materials developed for different groups. Many of these training materials are aimed at specialized trainings of intermediaries that can influence vulnerable consumers/ energy-poor people as a target group. Energy advisers and ambassadors are trained among professionals, social workers, etc. There is also a trend toward professionalization of the activity - examples in this direction are the development of an accreditation system and various methodological guides. Another important positive point is the search to recruit advisers/ambassadors from the target groups, as well as attempts to engage young and unemployed people.

There is considerable accumulated experience related to the elaboration and implementation of different training materials and modules. They aim primarily at different intermediaries between energy suppliers and consumers. It may be useful to bring all these training modules together in order to be used in the future. For the time being, they are present on the web as part of the specific projects and sometimes disappear along with the completion of the project.

There is also a second type of training materials, a set of guides aimed at (vulnerable) consumers whose main purpose is to suggest ways to save energy in homes. This takes different forms: on the spot (related to home visits), by the web and/or through call centres – and presents activities for informing and advising.

Improvements of the informational flows and the better equipment of (vulnerable) consumers with knowledge on the processes (including with smart meters) are important premises for energy poverty reduction and empowerment of vulnerable consumers. Still, regarding empowerment much further steps seem very important. A necessary trend is to address vulnerable consumers and energy-poor not just as target groups on which to act but as stakeholders, 'experienced experts' in the field who could contribute to future development.

In this regard a different type of trainings needs to evolve as well: for example, trainings to participate in decision-taking mechanisms on energy poverty; trainings for civil participation capacity building; trainings in ref. with monitoring energy poverty generators; trainings for participatory assessments of the social impact, etc. All such activities, as far as they could be considered useful, also need training and training materials.

2.1.3.3. Networking

Networking is an integral part of almost all the EU projects: in fact, all of the reviewed projects have created and are based on some kind of networks. The range of these networks varies considerably - some are quite wide; others are quite narrow – just the project's partners. Still, there is a clear trend to engaging different kinds of stakeholders – professionals, stakeholders linked to the energy providers, social organisations, authorities at different levels (local, regional, national, EU), etc. Although, the sustainability of the

created networks is not quite clear (do they act only at the time of the project or continue after that), it is certain that capacity has been built in that field and that the results achieved could be useful, including by revitalizing networks created in the past.

The activities of the established networks follow the basic focus of the actions of the different reviewed EU projects. Besides, as a rule in these networks, consumers, especially vulnerable and energy-poor consumers are seldom, if at all, involved. Most often these are networks of intermediary bodies, often focused on the concrete actions and not involving broader framework of activities.

The review suggests that added value can be sought from the established networks: for example, better exchange between the different stakeholders on their field of interests; better feedback on visions and proposals, including from social workers and (vulnerable) consumers. Such developments could alleviate the current gap between energy and social stakeholders and contribute to better energy poverty reduction focus.

2.1.3.4. Enhancing energy saving behavioural change and strategies to involve consumers' engagement

In many of the reviewed (action) projects behaviour change to stimulate energy savings is a central aspect. In this respect, the projects present data on the outcomes and report the extent to which energy saving behaviour is achieved.

However, as a rule, this activity covers different consumers, but does not clearly target or relate to vulnerable and energy-poor consumers. Some projects report opposite results, as the information and advising could lead to increased use of energy. The reason for this is the fact that many of the vulnerable and energy-poor consumers could have already reached the possible limits of minimum use of energy and therefore **the focus on reducing energy costs by changing behaviour is not well adapted to vulnerable consumers and energy-poor people.**[28] For the same reason, projects targeting all users could hardly make significant contributions to vulnerable consumers and energy-poor.

The experience in energy saving behavioural changes accumulated by different EU projects could be very useful to contribute to the necessary assessments of minimum thresholds for energy and thus to support the process of elaborating methodologies for adequate minimum income schemes.

2.2. Assessing project-based interventions

Participants in the ASSIST project provided SWOT analyses and derived lessons concerning the main activities of the project. Although the assessments made concern mainly activities completed within the frame of the project ASSIST, they are valid and could be useful for improving of the given type of activity as a whole, and not only for the activities under ASSIST project. The arguments for such extended use of the results of ASSIST project are as follows: a) the project contains the main activities of the above-mentioned model; b) the

- [28] This phenomenon is identified by the "rebound effect". See for instance Nässén, J. and Holmberg, J. (2009), Quantifying the rebound effects of energy efficiency improvements and energy conserving behaviour in Sweden. Energy Efficiency, 2: 221-231

activities completed have the same (or similar) aims; c) assessing different activities, participants used all their previous experience (from other projects) and accumulated knowledge.

2.2.1. SWOT analysis and lessons learned from ASSIST training

Trainings were delivered in all the partner-countries and many national relevant stakeholders coming from quite different backgrounds were engaged. Home Energy Advisors (HEAs) – were trained on both technical and social competencies so as to gain the trust of the energy-poor and vulnerable consumers and to be able to provide them with support to be more efficient and better satisfy their energy needs. Upon successful completion a participation certificate was issued. Partners report a very large interest in undertaking the ASSIST training and rather positive participants' evaluations.

The ASSIST trainings were carried out in two different ways – by e-learning platform and by face-to-face meetings. These two ways are assessed separately as they have different strengths and weaknesses.

SWOT analysis for the training course delivered online through Moodle online delivery:

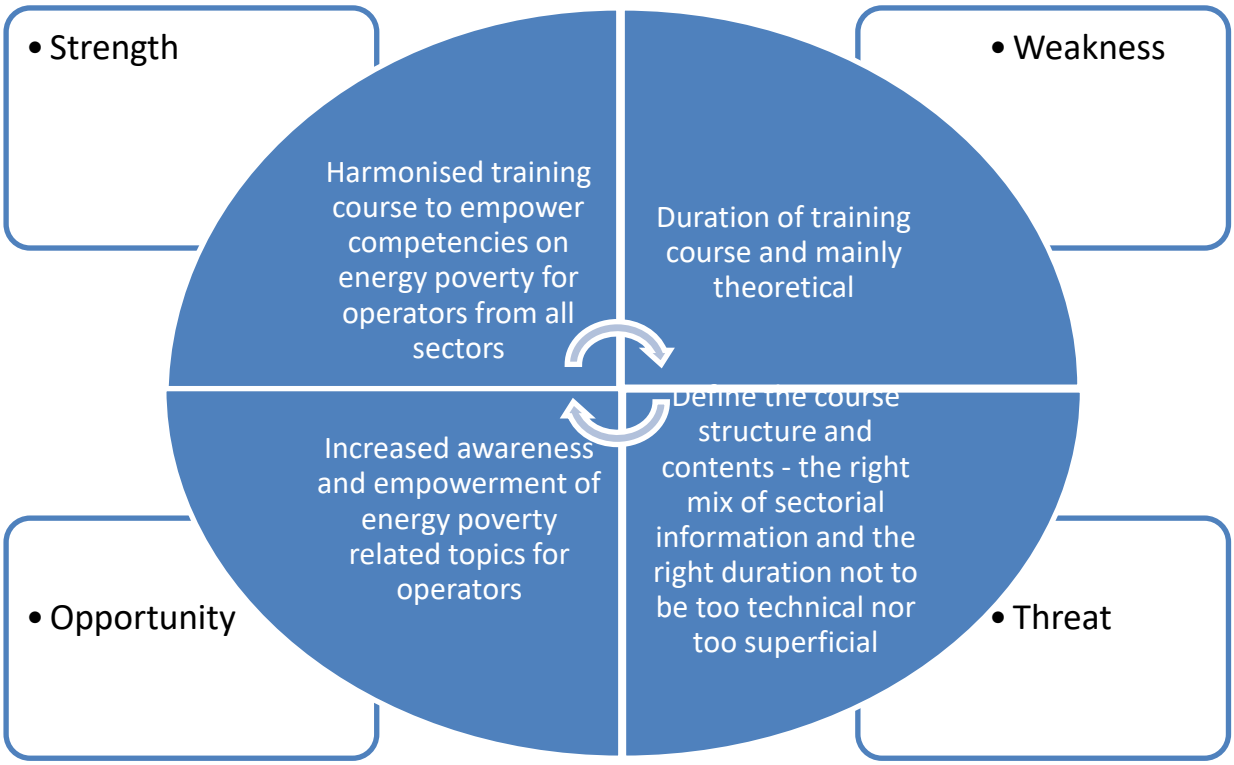

Figure 1 – SWOT analysis from ASSIST training – Moodle online delivery

In more details:

Strength	Weakness
Reach a high number of participants covering the full national geographical coverage	Low interaction and practical sessions with students, very important for some lessons such as those on communication
Update and increase contents accessible to participants of previous editions	Requires technical capacities above the ICT basic skills
Opportunity	**Threat**
Can be followed according to personal time needs and constraints and geographical location	Competencies and skills acquired not sufficient to provide advice and assist energy-poor consumers on the field

Table 9 – SWOT analysis from ASSIST training – Moodle online delivery

SWOT analysis for the training course delivered face to face in small group sessions

Figure 2 – SWOT analysis from ASSIST training – small group sessions

Strength	Weakness
The training had a much more personal approach and was able to respond to real life situations e.g. the HEAs own homes	Travel time and physical attendance meant an extra commitment for HEAs
The trainer could also demonstrate technology such as energy and appliance monitors	

Opportunity	Threat
Physical meetings meant HEAs could meet each other and network with other Voluntary Sector organisations, resulting in more cross referrals for each other's services	HEAs put off from engaging in project as they are concerned about the extra work involved in reporting on results

Table 10 – SWOT analysis from ASSIST training – small group sessions

Lessons learned provided by the different partners could be summarized as follows:

1. Special trainings for intermediaries are highly needed as they empower stakeholders in energy poverty on how to identify and assist consumers facing energy poverty or vulnerability. The results from ASSIST training clearly demonstrate a real knowledge and competence gap related to tackling energy poverty on behalf of all the various operators supporting consumers in energy poverty or vulnerability.

2. Training of vulnerable consumers to become Home energy advisors in their surroundings has added value as they are better linked with the affected persons and beneficiaries are more confident with the Home energy advisors if they know them.

3. Energy advising, especially for vulnerable consumers, should be part of the professional engagement with careful assessment of the workload. Otherwise there is high interest in the training for personal reasons but difficulties to put into practice skills learnt dues to possible conflicts with other commitments and engagements.

4. Balancing the training curriculum between technical and social modules. It is challenging to tailor lessons according to the different skills and activities of the HEA – "too technical for some, too sectorial for others". The right mix in the course structure and contents should provide competencies and skills sufficient to advise and assist energy-poor consumers on the field.

5. To provide quality training, lessons need to be updated regularly taking into account changes in European and National directives and with National energy market.

6. When an e-learning platform is used for the training the choice of the online platform needs to be carefully adjusted to participants' skills.

7. Practical aspects of the training: "It has been a good practice to evaluate Home energy advisors through an energy intervention in their own households: energy bills analysis, energy audits, and recommendations."

8. Specialized training will be more successful if there is an increased public awareness on energy poverty nearly through all societal sectors and stakeholders.

2.2.2. SWOT analysis and lessons learned from ASSIST networking

The network of "Vulnerable Consumers Energy Advisors" represents a virtual place where trained Home Energy Advisors share their working experience and are constantly updated. The network is a first contact point for vulnerable consumers to ask and receive support on their domestic energy efficiency issues and/or social-economic issues.

Network activities included: Addressing vulnerable consumers through specific mailshots and regular communication channels to inform them on the network; to provide practical information soft assistance and support on energy efficient behaviours.

The assistance to vulnerable consumers differentiated among a) cases where energy savings are possible, and b) cases where deep energy-poor consumers are not in a position to further reduce their energy consumptions and thus the impact is not saving energy but increased life quality.

The SWOT analysis reveals:

Strengths

The HEA network is built with approach where strategic partnerships with identified organisations and associations are utilized in attracting and involving new HEAs. Trusted institutions ensure longer-lasting impact of the results gained through various HEAs activities.

Helping energy-poor consumers is a strong ethical or professional motif for many involved HEAs in the network. This type of involvement brings about quality advisory services and interactions that are targeted, personal, and thus the most helpful for every single vulnerable consumer.

Possibilities to give compensation e.g. offer lunches or gift cards for the HEAs and other rewards for their voluntary work. Good experiences from some partners e.g. by inviting HEAs for lunch in order to keep up with networking activities.

Weaknesses

Establishing a community without compensation or institution makes long-term prospective difficult.

HEAs are primarily considered as volunteers which makes it difficult to forecast which kind of solutions and approaches could work in each setting. By default, a volunteer cannot be expected high workload such as reporting of activities. Leading voluntary work requires special skills.

Opportunities

The idea of a HEAs network with peer-support idea is powerful. Lessons learned e.g. from an online networking tool with hundreds of active users is interesting for various practitioners.

Some markets may be underserved in terms of energy advisory work which provides several opportunities for new businesses.

Positive press media coverage of the project or the partnering companies could bring further opportunities.

Changes in general customer attitudes or in legislation that would boost HEAs activities

Threats

Minimum long-term impact due to the project nature: HEAs particularly without the structure and support of a working context or a background institution face difficulty in translating into practice their learning outcome. HEAs support network will not come for free (human resources). New initiatives and collaborations that have started only at a later phase of the project cannot go on.

Finding appropriate communication tools for keeping up the network. Sometimes no online communication tools can be used at all (e.g. literacy issues).

Changes in attitudes (e.g. towards energy efficiency, home advisory work etc.) or in

	legislation that would hinder HEAs activities
	Negative press or media coverage against the local partner organisation
	Emerging competitor from other HEAs network or provider
	Sudden and unpreceded popularity of the pursued HEAs activities and no resources to scale up

Table 11 - SWOT analysis of the ASSIST networking

The lessons learned provided by the partners outline the following picture:

1. When setting up a virtual network the choice of the ICT platform is very important and should be user friendly and based on the already available skills of participants

2. To support the network a very committed coordinator is needed as it is quite time consuming, in ref. with updating materials, keeping the interest of Home energy advisors high on tackling energy poverty, etc.

3. Difficulties to involve people to voluntary work of this type. Most involvement if Home energy advisors is already working with the topics covered as part of their daily obligations. Home energy advisors interested in exchange of information and experience from other Home energy advisors but networking Home energy advisors requires a large effort.

4. It is challenging to find the most appropriate ways of involving different kinds of potential groups of Home energy advisors. Home energy advisors were not comfortable using the HEA forum and interacting between different groups

5. Challenging was to engage with operators from some sectors, such as from energy companies. Social workers are rather interested but feel that they require a lot of encouragement as “energy” appears very technical and difficult for them. There is a strong gap between “energy sector” and “social sector”.

6. Home energy advisors don’t feel part of a community. There is a need for networking building events, periodic face to face meetings in order to share doubts, specific cases, answer questions, top up their resources (e.g. energy saving leaflets and gadgets), etc. In countries where such meetings were available, for example, UK and Spain, Home energy advisors appreciated these sessions very much.

2.2.3. SWOT analysis and lessons learned from enhancing energy saving behavioural change

The ASSIST action also aimed to design, implement and evaluate innovative support services for vulnerable consumers / energy-poor on a country based level with a market-oriented and flexible approach. The activities included: feedback mechanisms providing vulnerable consumers with appropriate frames of reference in order to determine whether (and to what extent) their energy consumption may be reduced; implementation of an energy audit; community-based initiatives through the introduction of new, pro-environmental social norms; support in requesting and obtaining existing available funds for energy efficiency; testing an innovative funding mechanism for the take-up of small measures.

The logic of the action tried to differentiate two possible impacts:

a) Possible energy saving by engaged vulnerable consumers /energy-poor, and

b) Increased life quality in cases of deep energy-poor, where further energy saving is illogical and harmful.

The overall SWOT analysis of the action implemented provides 4 main characteristics:

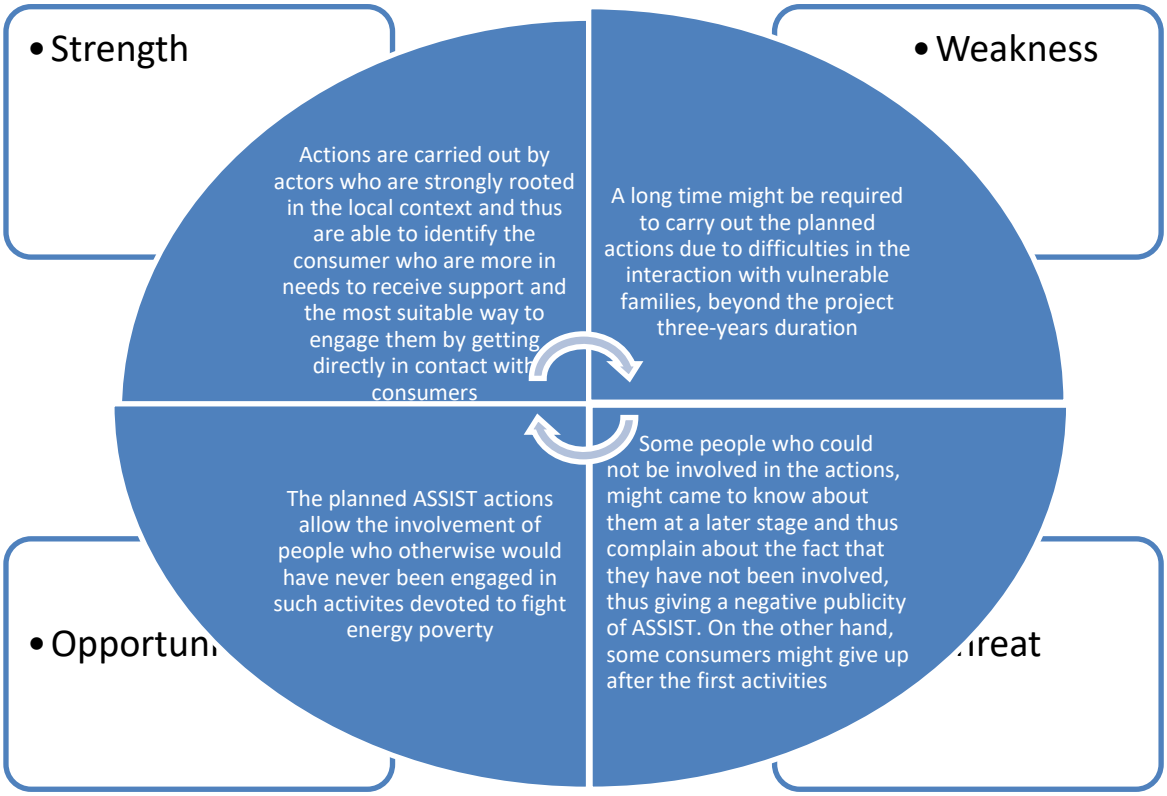

Figure 3 – SWOT analysis of the actions implemented

Actions were defined at National level on the basis of the results of the national context analysis and of the market segmentation carried out. Thus, in the different partner-countries different actions were undertaken.

For example, in Belgium a network of Energy cutters is already operational since 2008 and performs more or less the same tasks as the HEAs. The majority of the Energy cutters are social employed and visit around 2.000 vulnerable households monthly. Although the existing network of Energy cutters is already successful, the ASSIST-project offered an opportunity to assess some specific issues that can reinforce the current network of Energy cutters and increase impact (energy saved, number of vulnerable consumers engaged), such as working with volunteers, extensive monitoring of energy consumption and comfort, enlargement of the target group (e.g. the deaf and hard of hearing group, vulnerable consumers that are not available during working hours). New tools that can facilitate the work of the home energy adviser (e.g. “woonmeter”, a thermo- and hygrometer for correct heating and ventilation; promoting energy-efficient behaviour and increasing comfort) and new training material (e.g. on social skills) were tested. In frame of the ASSIST project the Belgian partner also implemented some new activities to engage with vulnerable consumers in addition to home visits and dedicated energy advice. The meter readers of Fluvius participated in information sessions on energy-efficient behaviour so they can share the energy saving tips they have learned with their clients. A large marketing campaign was set up, specifically targeting 40.000 vulnerable customers. All the vulnerable costumers received

a weekly email with energy-saving tips over a period of 10 weeks. There was also a competition linked to the flex mail which contributed to the success of the marketing campaign.

In Finland, energy cafés turned out successful to informally discuss energy saving issues among many VC groups and to recruit peer advisors. Energy classes for school pupils had been quite useful as well both to share knowledge on energy issues with young people and through homework (such as energy assessments for devices), to engage also families of the students;

In Poland, helpdesks were organized during local events.

A final report, presenting all activities carried out by all partners with the results of each action in terms of energy savings and other indicators is available as Deliverable 5.5. of ASSIST project.

Besides, all partners provided lessons learned from their activities. Although the activities in different countries were different, all partners faced two major difficulties:

- A difficulty of Home Energy Advisors (HEAs) to contact vulnerable/energy poor consumers and collect reliable information on their energy consumption. The lesson derived is that it is better *"only Home energy advisors already working in specific contexts (already active in providing support) to carry out actions" (UK)*. Besides, as noted in Spain *"it is better to enrol only HEAs who have the users' participation consent and data protection in advance. We have proved that then everything runs smoothly!"*
- Another difficulty, reported by all partners is the workload for the HEAs, especially if they are volunteers. As noted In Belgium "*the workload is reduced if they can combine the HEA tasks with their current job*" (Belgium MAD). Specially to report on what activities were carried out to support energy-poor/vulnerable consumers is considered very time consuming by all partners.

Other needs outlined by the SWOT assessments:

- Strengthened cooperation among different stakeholders (Finland);
- Monitoring the impacts for a longer period (Italy);
- Paying attention to private data regulations (Italy and Spain);
- Difficulties to access energy bills in order to base advice on them (Spain).
- Some valuable modules were missing in the training and modules on relational skills and protection were added. (Belgium).
- Some incentives had to be offered (such as small gadgets and leaflets; "woonmeter") to attract vulnerable consumers (Poland, Belgium).

2.2.4. Information and advising - SWOT analysis and lessons learned from communicating energy efficiency to vulnerable consumers

The activities aimed at providing quality communication to vulnerable consumers and included: provision of communication tools on domestic energy efficiency specifically targeted at vulnerable consumers; managing a virtual helpdesk for vulnerable consumers and creating a database of questions/complaints; creating a virtual community of vulnerable consumers.

The SWOT analysis depicts:

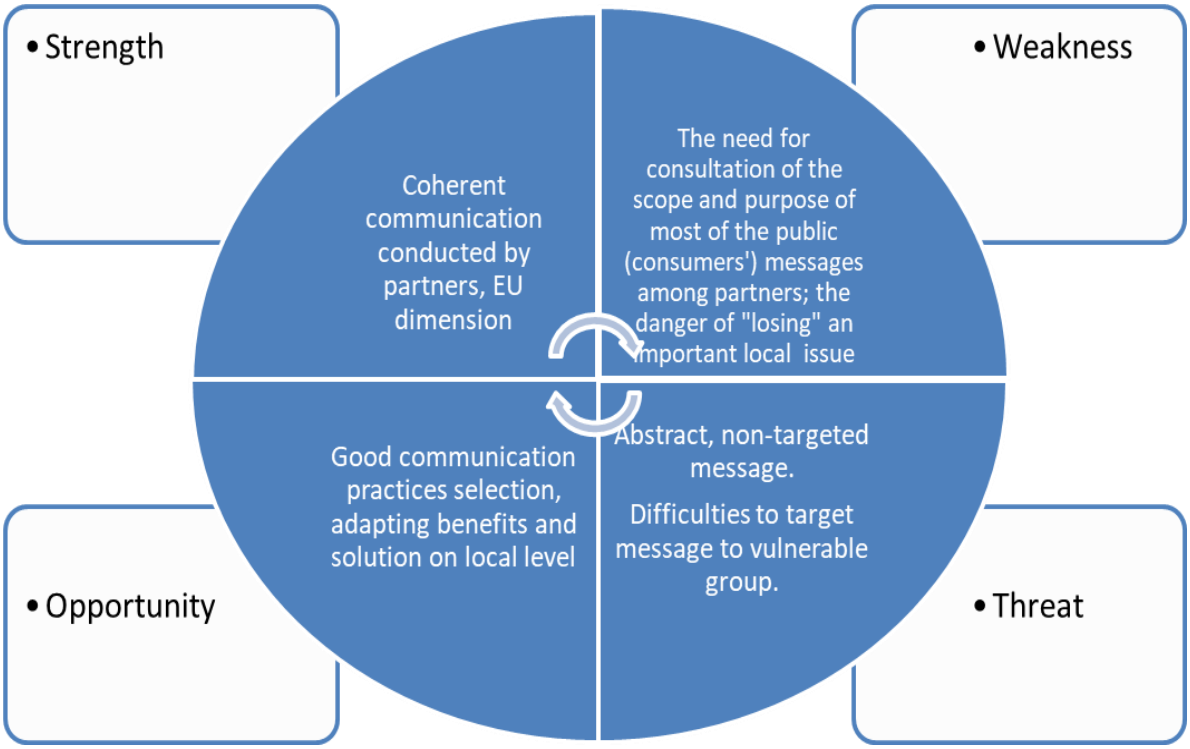

Figure 4 – SWOT analysis of communication activities

Strengths

The topics relevant for all participating countries were chosen, thus providing a common message across Europe. Wherever possible and attractive for consumers, the same posts, information, and flyers were published, and a common database with complaints was used. In some cases, the content needed some country specific adaptations, while keeping the main message and tackling the same problems, despite national discrepancies (e.g. in law, market , climate etc.)

Weaknesses

Finding the most common topics to communicate meant that in some countries some important issues could be missed as totally not relevant for other countries. To minimize this effect, all partners were allowed to adapt 1-2 topics further (i.e. exclude one common topic and replace it by country-specific one).

Opportunities

As various strategies and methods of communication, as well as specific social media are differently used in the partner-countries there was a possibility for a know-how transfer. Also concerning content of the topics, there was a great opportunity to learn solutions addressed to consumers in the partner-countries.

Threats

One of the biggest threats is linked to the question how to choose the target group – the energy poor/vulnerable consumers. But this means different groups country by country. In some Member States there is no definition of energy poverty at all, in some there is but it varies among the countries. Secondly, targeting was a challenge because we tried to avoid negative effects

	or “stigmatization” of people because of income level, unemployment, social situation, age or gender.

Table 12 - SWOT analysis of communication activities

The lessons learned could be summarized as follows:

1. It is difficult to enrol vulnerable consumers in an ICT platform as they prefer personal contacts through face to face meetings or direct e-mails to them rather than virtual activities; It is difficult to gain the trust of vulnerable consumers without a proper and trusted intermediary;

2. Communication channels need to be activated and communication material needs to be continuously updated to properly reach consumers on energy issues. Proper tailor-made materials are extremely important (e.g. videos)

3. It is possible to create a communication message based on European background but targeting individual consumers the message should be also country specific. Leaflets with a more visual format and which address the specific local issues are necessary. For example, the UK partner complemented the ASSIST factsheets with leaflets addressing specific issues like ‘Reducing Damp and Condensation’ and ‘How to Manage Electric Night Storage Heaters’ as those are still used by many households in the UK.

4. Managing a help-desk is a difficult task for a big energy supplier, let alone for partners of a project.

5. Communication with vulnerable consumers should include specific financial savings, not only savings in CO2 emissions or KWh consumption. This is a necessary condition for creating a clear and understandable message. Improving living conditions and thermal comfort is just as important as saving energy. (Pl)

6. In countries where there are already established networks and/or helpdesk that are trusted it is better to use them to reach consumers instead to setup short-term new ones.

7. It appears not easy to gather feedback to the complaints database and additional efforts are needed to analyse why this is so

2.3. Concluding remarks

As Spanish partners point out: “*While there are many things being done, more needs to be done in terms of a) coordination between organisations, b) communication to vulnerable groups, c) providing household assistance/aid; d) tackling the problem from a macro-level perspective*.”

The undertaken actions and the way (vulnerable) consumers and energy poverty are addressed have resulted into different positive outcomes, as proposed by the different projects. They could be summarized in:

- Better informed consumers, including vulnerable consumers and energy-poor people;
- More developed qualifications of different stakeholders and capacity building
- Better knowledge on energy poverty and vulnerable consumers;
- Created networks of different stakeholders
- More informed policy proposals

Still, the question to what extend this has contributed to the decrease of energy poverty remains open. Acting within existing policy measures, project-based interventions do contribute to better awareness-raising, reaching new consumers, broader discussions on the problems concerned. However, the projects echo many of the weaknesses of policy interventions and are limited by their boundaries. Serious efforts are necessary to transform the positive outcomes into a real energy poverty reduction:

1. Provide a clearer focus on energy poverty and vulnerability

- The review and assessment of the project-based interventions shows that clear focus on vulnerable consumers and energy poverty remains problematic above all due to the lack of a clear and accepted methodology for identifying and monitoring the vulnerable consumers, their situation, behaviour and energy poverty. The absence of a definition of energy poverty at European level, as well as the varied and even contradictory practices in the various EU Member States, result in the absence of a common approach to addressing energy poverty and vulnerable consumers;
- The lack of clear identification of the problem of energy poverty generates inadequate support and insufficient solutions;

2. Understand the limit of the energy saving-only approach

- It could be suggested that vulnerable consumers and energy-poor people could hardly take advantage of energy saving and that there is some limit linked to energy saving rational behaviour and to the ability to cut costs to get out of the state of energy poverty. However, this may not apply to all groups of vulnerable consumers and energy-poor.
- It is very important the assistance to vulnerable consumers to differentiate among: a) cases in which energy savings on individual basis are possible, and b) cases in which consumer in energy poverty are not in a position to further reduce their energy consumptions and thus the desired effect should not be energy saving but increased life quality and comfort.
- Energy-saving incentives should be clearly targeted at specific segments of consumers that could really save energy;
- Energy-poor people rather require a different approach. Perhaps the reminder of the Occam's razor[29] could help - there will be no consumers in energy poverty if there is what could be called ‘energy welfare’ (good consumers’ purchasing power, affordability of using clean energy and good quality of homes) “*Communication with vulnerable consumers should include specific financial savings, not only savings in CO2 emissions or KWh consumption. This is a necessary condition for creating clear and understandable message. Improving living conditions and thermal comfort is just as important as saving energy*”. (Pl)

3. Tailor-made advice should be developed

[29] A problem-solving principle that states that: "Entities should not be multiplied without necessity". The idea is attributed to English Franciscan friar William of Ockham (c. 1287–1347) and is often paraphrased by the statement: "The simplest solution is most likely the right one". The principle is usually recommended in science, but its application in the policy-making could also help.

- Energy advising, especially for vulnerable consumers, should be part of a workplace professional engagement with careful assessment of the workload. Otherwise there is high interest in the training for personal reasons but difficulties to put into practice skills learnt. Providing qualified information and advice needs to be a clearly defined job and not a voluntary effort.
- Training of vulnerable consumers to become Home Energy Advisors (HEAs) in their surroundings has added value as they are better linked with the affected persons and beneficiaries are more confident with the Home energy advisors if they know them.
- Special trainings for intermediaries are highly needed as they empower stakeholders in energy poverty on how to identify and assist consumers in energy poverty/vulnerability. The results from ASSIST training clearly demonstrate a real knowledge and competence gap related to tackling energy poverty on behalf of all the various operators supporting consumers in energy poverty/vulnerability. The review of different projects depicts also clear gaps as far as energy poverty is concerned: between researchers and interventionists, social and energy stakeholders, consumer protection measures, measures aimed at adapting behaviour and measures for empowering consumers, etc.[30]

4. Build on the experience of vulnerable and energy-poor consumers

- Vulnerable consumers and energy-poor are addressed as a target group subjected to the impact of different interventions being implemented and the question of their involvement as 'experienced experts', including in decision-making, is addressed rarely, if at all. Trainings in this regard could be very helpful. Perhaps, transfer of a pointed out good practice in Flanders, "poverty checks" (participative assessment of the impact of policies and measures on energy poverty) could be useful.
- Participation concerns all phases of the policy cycle. Assessments suggest that involvement of NGOs and the people experiencing energy poverty is not enough. NGOs are mainly involved in one phase of the policy cycle - the implementation of the policy measures against energy poverty. Their involvement in the other phases of the cycle: exploring the main risk factors, formulating policy measures to address the risk (its causes), and evaluations of the effectiveness of the measures is rare, despite the impressive experience they have accumulated in the field. There is no working schemes for structured dialogue and the voices (knowledge) of the people experiencing energy usually do not reach the space of public debates and have no impact on the policy cycle (more specifically – the phase of policy formulation).

[30] A summary of National and European measures addressing vulnerable consumers and energy poverty, published in 2018, can be found on ASSIST's website https://www.assist2gether.eu/documenti/risultati/d2_5_vulnerable_consumers_and_fuel_poverty_report_final_201805151.pdf

Part 3: POLICY RECOMMENDATIONS FOR IMPROVEMENT OF VULNERABLE CONSUMERS' PROTECTION IN THE FIELD OF ENERGY POVERTY

VCSC's participants mention several achievements of the policies for tackling energy poverty:

- The growing recognition of the risk of energy poverty and its policy importance and the intensive discussions of different options;
- The trend towards establishing definitions of energy poverty and the significant efforts for poverty alleviation through different interventions – policy measures and project-based interventions;
- Involvement of civil society sector, including trade unions, development of networks and increased perceptions of the need to involve vulnerable consumers as active participants in the fight against energy poverty.
- The accumulated experience in implementation of policy and project-based interventions for alleviation of energy poverty and identification of successful good practices and their dissemination as grounds for possible improvements;

Despite these achievements, some participants conclude that *„Not all countries have approached the issue of vulnerable consumers' protection with the same determination"* (Italy VCSC) therefore, there is a lack of policy consistency across countries and a need for improvements in this respect across EU (UK VCSC). On this basis ASSIST project emphasizes the need of urgent and decisive improvements and proposes a wide variety of recommendations. The suggestions of ASSIST project follow the vision of an Energy Union build around the consumer, with citizens at its core, where citizens take ownership of the energy transition, benefit from new technologies to reduce their bills, participate actively in the market, and where vulnerable consumers are protected. The recommendations derived from different forums, research and the training – networking- in field actions model demonstrate the EU relevance of the ASSIST project and the importance of the political commitment of EU institutions.

Policy recommendation		*Details*
Identify better the energy-poor and vulnerable consumers		1. Definition of Energy Poverty at EU and national levels 2. Adopt a holistic approach to include the root causes of energy poverty 3. Set a baseline of indicators 4. Recognise energy as a Human Right
Improving support for the vulnerable households	Improving the non-financial support for the vulnerable households: Improving financial support	1. Provide information and advance informative services for consumers 2. Increase education and

	for vulnerable consumers Special measures for assistance of groups with special needs: people with disabilities, old people, immigrants.	awareness-raising 3. Multiply energy advisory services 4. Provide more holistic support for vulnerable and energy-poor consumers 5. Address bureaucracy 6. Increase the amounts of the benefits 7. Design a special tariff with low energy prices for a basic consumption level 8. Engage people with disabilities, elderly people, non-native speakers, immigrants, homeless
Improving buildings energy efficiency		1. Address the poor quality of the housing on the rental market 2. Improved the regulatory framewor 3. Offer better financing solutions 4. Invest in social housing
Increasing policies consistency		1. Coordinate better different policies and achieve synergy of their impact on energy poverty 2. Address the inconsistencies of the tax system 3. Make the European energy transition socially sustainable by strengthening the participation of social stakeholders 4. Carefully monitor the economic and social developments and their impact on energy poverty 5. Monitor the energy price increase 6. Pay better attention to the timing of the policy measures 7. Look at the energy market design 8. The EC needs to write a guidance document to explain and to frame how Member States

		should act
Improving the energy market		1. Better define energy prosumers and stakeholders 2. Review and analyses of the way energy markets are constructed 3. Strengthen the measures against unfair business practices from suppliers and other stakeholders, for instance those performing renovation work
Improving the interactions between stakeholders	Strengthening the role of intermediaries Improving the training provided Measures to involve vulnerable consumers:	1. Set up specific forums of discussion and collaborative platform, engaging all kinds of stakeholders, including households and institutions 2. Adapt the communication tools to needs of the users 3. Vulnerable consumers need trusted intermediaries to act on their behalf and inform them 4. Involve more closely the Social Services and municipal services 5. Provide more resources for advice organisations and NGOs 6. Information campaigns have to reach large segments of society 7. Special training campaigns for intermediaries are highly needed 8. Energy advising, especially for vulnerable consumers, should be part of the workplace professional engagement with careful assessment of the workload 9. Balancing the training curriculum between technical and social modules
Increasing knowledge and "evidence-based policies"		1. Investigate and share knowledge about the causes of energy prices gr 2. Deepen research on consumer's

		behaviour 3. Assess the social impact of the legal framework and policies in the energy sector 4. Stimulate better interactions of different stakeholders and their capacity to search for adequate solutions 5. Increasing the capacity of social workers to participate in the fight against poverty
Strengthening the evaluations of policy measures'		1. Address inappropriate or inefficient targeting 2. Assess the effects of the policies on energy poverty

Table 13 - Policy recommendations

3.1. Identify better the energy-poor and vulnerable consumers

All participants share the need of better identification of vulnerable consumers. "*A more accurate identification of vulnerable consumers is essential for the definition of better policies avoiding the stigmatization and discrimination of people*" (Spain MAD).

- Elaboration and implementation at EU level of a **definition of energy poverty** enabling better targeting policy measures (identification of target groups) and for reaching specific groups of vulnerable consumers that are now left out of the existing energy advisory services. If this step – adoption of a common EU definition – faces barriers, then (at least) a common EU frame could be created and all Member States should be stimulated to define energy poverty in their own national context, having the common frame, as a starting point, and as an opportunity to make some progress in comparison to the current status quo. "*A common understanding of the concept of energy poverty will help Member States, civil society and industry to start a dialogue about energy poverty and how to tackle it*."; "*A consistent diagnosis is necessary". Additional proposal focuses on the need "the subject of energy poverty to be more strongly emphasized in defining the problem of poverty*". (Poland VCSC). However, some preparatory work is already done by the EU Energy Poverty Observatory. The observatory defined different indicators that can be useful as a starting point for elaboration of a definition.;
- **Adopt a holistic approach** to improve knowledge and understanding, enlarge the scope of identified causes, the scope and effectiveness of policy measures against energy poverty, and get a wider political recognition. "*Energy poverty is currently tackled by mainly financial measures but there is a need to embrace a holistic approach*." (Italy VCSC) This is necessary also as a response to the need of more information, knowledge and visibility about the causes of poverty and the behaviour of social stakeholders. The recommendation that can be made is to broaden the scope and intensify research into the root causes of energy poverty. The results of such studies may be useful in

improving the policy measures (connecting the list of the policy measures to the root causes in order to improve the way the causes of energy poverty are addressed) as well as improving the coordination of different policies affecting energy poverty.

- Discussions in the course of ASSIST project suggested that given the diversity of challenges leading to barriers to access energy services across EU Member States, it might be beneficial to identify a minimum set of **indicators** set at EU level, that each MS should include or refer to in national definitions. MS could then build on that and specify additional indicators that reflect the unique challenges experienced by consumers in their respective context. "*MS have to define energy poverty according to three criteria: low-income, energy expenditure, low energy efficiency. These are the three criteria that MS have to include in the definition.*" (EU VCSC)
  Indicators could be "*similar to the logic used for the material deprivation indicator although suitably adapted scheme to the benchmarks of energy poverty*" (Poland VCSC).
- Recognition of **access to energy as a Human Right**, would allow better participation in society and provides ground for a dignified life. That is why access to energy should be guaranteed and disconnections banned. Some participants also proposed to provide of a minimum amount of energy free for all. It would bring European countries closer consistency with the Seventh United Nations Sustainable Development Goal, i.e. "Ensure access to affordable, reliable, sustainable and modern energy for all"[31].

  Improving the identification of vulnerable consumers is sometimes associated with a specific problem – *"people do not want to be stigmatised or just identified with a label (fuel poor or disabled) and that is why it is very difficult to identify such people"* (UK MAD). A possible solution has been proposed: *"It may be better to advertise the vulnerable consumers funding under a climate change badge rather than as an energy poverty scheme"* (UK VCSC)

3.2. Improving support for the vulnerable households

3.2.1. Improving the non-financial support for vulnerable households

Most participants agree that more attention should be paid to the non-monetary measures supporting vulnerable consumers:

- **Information and advanced informative services** for consumers should be a priority of the project-based interventions in the future. Home energy advisors stressed a strong need to provide support to consumers in energy poverty as these people are unaware of existing financial (such as the energy bonus) and non-financial support schemes (such as Sportello del Consumatore).The lessons learned how to better equip consumers with the necessary knowledge for their everyday consumption patterns and to better follow the information from the energy providers. These recommendations are linked as well to proposals for higher attention to qualified trainings in the field and building capacity in networks;

[31] https://sustainabledevelopment.un.org/sdg7

- **More efforts for expanding education in the field**. *"People need more education*" **(**UK VCSC); "*At European annual meetings of people experiencing poverty, this topic should also be discussed*".

  Besides there is need to include energy usage in linked educational programmes, for example, the issue of managing the individual household budget (Poland VCSC); "*Citizen training and sensitization*". (Spain MAD); "*Providing integrated measures that include education and empowerment of vulnerable consumers*" (Spain VCSC) "*Information accumulates quickly and all advisory related materials require very frequent update loops to stay relevant."* (Finland MAD)
- **Energy advisory services** should be expanded beyond energy experts. "*It provides cross-sector knowledge and problem-solving capacity while reaching new customer segments*." (Finland MAD)
- **More holistic support for the vulnerable consumers**. "*By working via budget meters, debt repayment is only done with regard to energy. The other debts are not charted and therefore insufficiently taken into account. In debt counselling, all debts of a person must be mapped out and an integral approach must follow that is feasible for the debtor (e.g. in terms of repayments)*". (Belgium VCSC); "*The participants also suggested the implementation of an integrated card in which all the social benefits of the families are included, in order to simplify the provision of services and facilitate the work of the related public administrations*." (Spain MAD)

3.2.2. Improving financial support for vulnerable consumers

- **Address bureaucracy** by *"Enhancing and facilitating the application process; Reviewing the assignment criteria in order to efficiently address vulnerable families"* (Spain VCSC); Since different administrations may affect negatively the implementation of policies and at a territorial level may pose obstacles to access to measures that favour vulnerable groups, participants emphasize *"the need to unify mechanisms to speed up procedures" and to reduce "major administrative barriers which would prevent the real objectives of the measures, which is to benefit VCs, from being achieved".* (Spain VCSC);
- There is a need "*to **improve the amount** of the social benefits addressed to vulnerable users*" (Spain MAD). This means several steps, such as assessment and regular updating of the level of benefits. Participants propose also "*Expansion of the social tariffs for all people with an increased allowance, social tariffs based on income instead of market price…* ." (Belgium VCSC); Creating a new social tariff that could be progressive and structured by levels of consumption in a way that it could eventually finance up to 100% of the electricity bills in the most severe cases of vulnerability; "*Including preventing and not only corrective measures*" (Spain VCSC);
- **Design a special tariff** with low energy prices **for a basic consumption level**; "*A social tariff for the electricity was suggested as well, not related to the market price variations and with a stable price reviewed half-yearly, according to the family incomes; Apply disconnection protection for vulnerable users; To define and apply identification protocols for early vulnerable risk detection*" (Spain MAD);
- *"It is important to **link energy efficiency measures to the purchasing power** of vulnerable consumers (their ability to invest in energy saving measures). Behavioural change depends on the financial capacity (disposable income) of vulnerable households."* (Belgium VCSC); Some participants suggest that when energy prices are

very high, vulnerable consumers cannot reduce further their expenditures because they already consume minimum energy (Spain VCSC).

- **Derive lessons from good practices**: *"In Finland different forms of poverty are being tackled in a holistic manner with the citizen in the centre. The new development where most social welfare benefits are served from one service point reduces stigmatization and makes the information flow easier for the vulnerable customer"* (Finland VCSC).

3.2.3. Special measures for assistance of groups with special needs: people with disabilities, elderly people, women, non-native speakers, immigrants, homeless

- Belgian partners stressed the need to engage homeless people, non-native speakers and households with immigrant background (Belgium MAD)**.**
- The elderly are also a relevant category: "*The elderly have difficulties not only with energy issues but to understand the market and their rights*." (Italy MAD); "*Some of them are seniors living alone – they need training and meetings regarding energy law, aid and protection programmes were so important. Also issues of co-financing for thermal modernization. According to the participants, the programmes related to the Clean Air Program are insufficiently popularized*." (Poland MAD); "*Elderly may benefit more from house visits that assist on common issues, such as help in reading letters, paying bills, cleaning, scheduling of visits, arranging logistics and showing where to get services and entertainment. After the acute basic needs are covered, people can afford to think long-term issues*." (Finland MAD)
- Studies[32] suggest also that more women than men may be subject to energy poverty. Women especially if they are heads of single-parent families are more severely affected by energy poverty. In such cases women need special support, when it is not provided within the frame of the general system of social protection.
- There is a need to "*Improve access to information for specific vulnerable groups such as people with disabilities, deaf, blind, people with learning disabilities – to be able to gain access to local authority grants for home and heating improvements, to choose online cheaper tariffs; more resources for advice organisations*" (UK MAD).

3.3. Improving buildings energy efficiency

Participants stressed the need to strengthen the measures addressing the poor quality of buildings (especially those buildings on the market for people with low-incomes).

- **Address the poor quality of the housing on the rental market**: a high share of vulnerable customers rent their apartment (with 'split incentive' problems: owners have to invest in energy efficiency measures, while the tenants enjoy the benefits of those investments, and generally cannot afford a higher rental price if the owner decides to recuperate the energy-efficiency investment). These problems should be tackled with a high priority and participants strongly recommend massive and effective renovation programmes that are crucial to provide all with efficient homes.

[32] European Institute for Gender Equality (2012), Review of the Implementation in the EU of area K of the Beijing Platform for Action. Women and the Environment. Gender Equality and Climate Change – Report, Belgium: Publications Office of the European Union, https://op.europa.eu/en/publication-detail/-/publication/9ef701cd-3c76-48a7-8739-eb1fc126ffa7

"*Increase the supply of quality homes (especially in the lower segments of the rental markets)*. (Belgium VCSC); As stated by the Flemish Energy Agency: "*In general Flanders has poor housing quality. One third of the home owners cannot afford an energy renovation of their home. New financing instruments or business models are needed to (pre)finance the very challenging renovation goals e.g. revolving funds for low-income homes*."; "*The public housing policies need to be developed in an energy efficient way and more budget need to be assigned to the building renovation for the improvement of their energy efficiency*."(Spain MAD). But there is still no momentum or ambitious programmes set in motion in Europe and "*things aren't improved for the people*" (UK VCSC).

- This supposes improved regulatory framework, better financing of programmes and "*a fast track to improve the energy efficiency of social housing*" (Italy VCSC). ***"****Funding is not sufficient for the insulation of the old buildings… Legislation has lots of loopholes. Old properties are exempt from improvements".*(UK VCSC). "*A large group of energy vulnerable or energy poor consumers live in municipality-owned buildings, with a very limited influence and impact.*" (Poland VCSC). "*The national renovation strategies should be developed in a participative manner with the involvement of different stakeholders and will contain different measures tackling energy poverty*." (EU VCSC);
- Bearing in mind the large number of houses of poor energy effectiveness on the private rental market and the large shortage of social housing, Belgium participants suggested that *"It could be interesting to oblige a house owner, who shows no interest to comply with the minimum standards (e.g. roof insulation standard), to renovate and offer the renovated apartment/house on the social rental market"*. (Belgium VCSC);

3.4. Increasing policies consistency

- Urgent measures are necessary to **coordinate better different policies and to achieve synergy of their impact on energy poverty**. "*To answer the question about Social Protection, we go on to the question of tax, economic and price and this is the whole problem of energy poverty. To tackle energy poverty, we need to talk about the other things. It is a circular discussion*." (EU VCSC). "*A wider perspective is needed and different administrations need to coordinate better among them*". (Spain MAD).
- **Address the inconsistencies of the tax system**, by shifting to "*taxing resources instead of consumption, we need to make that shift. A complete shift. Encourage the use of renewables by shifting the tax from consumption to the resources to influence the choice of producers on what kind of source they use. This has a direct impact on consumers*." (EU VCSC).
- **The European Energy transition should be socially sustainable**. Participants stressed that it is vital that a transition to clean energy is carried out in an equitable way and it is not the most vulnerable in society that are left behind. One practical step for this aim is to strengthen the participation of civil society organizations (CSOs) in the implementation of the "Green Deal" especially through more effective participation in the elaboration and implementation of the National energy and climate action plans (NECPs). There is a need of strong connection of policies tackling energy poverty and the legislative framework on renewable energy and de-carbonization. EU participants strongly recommend "*starting discussions and reflections on policy recommendations*

from the Clean Energy Package and the opportunities it brings and the long term 2050 Climate Strategy". (EU VCSC)

- **Carefully monitor the economic and social developments and their impact on energy poverty**: "*First, EU policies to consider the differential impact that the on-going global economic and Euro area crisis is having on welfare levels across Member States, with a particular emphasis on the effect of austerity measures. Efforts to liberalize and privatize the EU's energy sector need to take into account domestic energy affordability and access criteria, and of energy poverty risks that the transition to a low-carbon EU poses in terms of increasingly higher energy prices*.";
- **Monitor the energy price increase** as "*Decision-makers should pay ample attention to equity aspect of the expected future price increase that will affect certain households more severely and could widen the existing "energy gap" and inequality among households*."
- One of the proposals concerns the **timing of the policy measures. "***Policy measures for tackling and preventing of energy poverty have to be implemented before full liberalisation of energy and gas market (dismantling of regulated tariffs or social tariffs*)" (Poland VCSC). Finnish participants emphasized that "*the costs of energy are high even if the consumption levels are very low. Especially the basic fees of distribution have risen a lot in the recent years, and this will end up stressing vulnerable households economically no matter how energy efficient or low-consuming the households would become. More focus has to be put into ensuring lower distribution basic fees in the future".* (Finland MAD)
- **Look at the market design**: in some Member States "*a general restructuration of the current energy system is needed to generate an effective social change*". (Spain MAD) *"The improvement of energy storage technology could help renewable energy companies to leverage their energy surplus, which could be of benefit for vulnerable families".* (Spain MAD)
- In order to stimulate the whole policy cycle related to vulnerable consumers protection **the EC needs to write a guidance document to explain and to frame how Member States should act.** This would ensure that there is not a recognition problem with different manifestations of energy poverty.

3.5. Improving the energy market

Participants' proposals aim at strengthening the impact on the factors determining energy prices, such as increasing the number of energy producers and traders, constant monitoring and effective protection of competition in the energy sector, independent monitoring and analysis of energy price evolution.

- Participants saw as a positive new trend the emergence of new types of market players in recent years: decentralised energy generation (small scale power generation sources located close to where the energy will be used, e.g. charging a car using solar panels on the roof of a house), '*prosumers*' and aggregators[33]. Participants appreciated the idea that customers are expected to play a different role in the energy market of the future. Municipalities and social housing organizations are mentioned as they started to install

[33] Competition Policy and Internal Energy Market" – study for the ECON Committee. 2017; Directorate General for Internal Policies. Policy Department A

their own energy systems, energy cooperatives. For participants in ASSIST project community-based energy production could be important solution, allowing people to make decisions over how and which energy they produce and consume. The problem is that extensive legislation on these new players is not yet in place and a legal definition for '*prosumers*' does not yet exist. The status of '*prosumers*' is likely to be defined at Member State level. A unified EU-level approach towards development and protection of '*prosumers*' will be difficult if every Member State uses its own definition. The EU should therefore give some guidance on the **key elements of a definition of '*prosumers*'**.

- Many discussions suggested that there is a need of a careful **review and analyses of the way energy markets are constructed** (effectiveness of existing regulations/de-regulations; level of competitiveness etc.) **and operate** (how markets shape the energy prices)

  The Market Design Initiative[34] identified that the central question of the empowerment of the European Consumer is: how can we reduce the barriers to entry for "prosumers" (owing decentralised energy facilities) that prevent them from becoming active on the market? The Initiative emphasized that the barriers are a consequence of regulatory provisions of **energy policy and consumer protection policy**. This means there is a need to carefully assess these policies.
- Participants strongly recommended strengthening measures against **unfair business practices,** from suppliers and other stakeholders, for instance those performing renovation work. *"Many of the vulnerable consumers are helpless in the face of various forms of abuse*. (Poland MAD).

  "*One of the big risks in the energy efficiency renovation industry is the part of private sector that works immorally. There are commercial operators that push for the services and products they have even if those solutions would not be optimal for the building owner; useless or harmful renovations done by door-to-door salesmen. Especially old people are getting tricked to buy solutions that are not really helping the households to save money in the long run. Offers may be the wrong solutions in the first place, may be overpriced and the quality of work may be inadequate. New solutions to prevent immoral commercial practices among energy renovations need to take place*." (Finland MAD);
  "*The funding has been given to utility providers (energy suppliers and they aim at 'low hanging fruit', i.e. easy measures"* (UK VCSC);
  "*More control for energy suppliers is needed. Energy suppliers do what they want, pay back when they want and are not given a notice of default. … There is a need to pass on costs for more social public service obligations instead of benefits of, for example, renewable energy for the most well-off*." (Belgium VCSC);

3.6. Improving the interactions between stakeholders

There is a need to overcome the gaps between researches and interventions; social and energy stakeholders. This aim could be achieved by:

- Enhancing convergence of the energy and social perspectives participants by **setting up specific forums** where the main stakeholders from both sectors can sit together and

[34] European Commission (2016) https://ec.europa.eu/energy/news/commission-publishes-new-market-design-rules-proposal_en

share their perspectives for common solutions. The creation of specific multidisciplinary working groups is seen as a necessary step to propose meaningful policies that tackle the causes of the problem instead of being merely patches to energy poverty problem.

- **Collaborative programmes** and events are a great way to make the different sector stakeholders collaborate. It is important to have non-commercial and non-profit facilitators for the discussions to increase trust between the network stakeholders. Transparent active communication by the mediator is also required to upkeep the momentum for low-barrier networking between sector stakeholders.
- A plural dialogue must be fostered to approach energy poverty. For this to happen, affected families should be more and better informed and trained about the practical, economical, technical and social aspects of energy use, to become effective actors and to better exercise and demand their rights. (Spain MAD)
- A different role of the **institutions** is needed, not only at the informational level but also in involving the different stakeholders and entities (Italy VCSC) proposing as good practice the training-networking-action model of ASSIST project (Italy MAD)
- "*To enhance the coordination and communication between social services and energy companies*." (Spain MAD)

3.6.1 Strengthening the role of intermediaries

Since energy company to consumer communication is not tailored enough to the needs of most vulnerable members, who also increasingly rely on communication with energy suppliers via the internet, participants propose alternative means of contact:

- **Energy suppliers providing text numbers** as well as phone numbers or offering face to face service and deaf awareness training for suppliers (UK MAD);
- **Vulnerable consumers need trusted intermediaries to act on their behalf** on tariff switching, checking their bills, picking up on heating problems or levels of insulation etc. Good response to these needs is face to face communication with a trusted organisation /person who knows what their tariff is and can switch for them. "*Training of Inclusion Hub staff and personal support workers would help this process and raising the awareness of Warm and Well home visits service for more complex energy issues*" (UK MAD)
  People in poverty are not easily reached via leaflets, commercials or internet campaigns. To reach them, work must be done through intermediaries that people trust, for example, through a community centre, housing assistance services or a debt counsellor. "*Guidance/advise given by the social workers on how to save energy and reduce their energy bills is very useful. This contact is necessary to tackle the problem of fuel poverty in a structural way*." (Belgium MAD)
- **Involve more closely the Social Services and municipal services** in the logistics of the disconnection notification to customers, or the identification of people in deep vulnerability to offer them better attention. "*This approach requires budget and human resources allocation for local administrations and could improve the communication between companies, public stakeholders and citizens. Public sectorial tables to coordinate the design and development of social benefits could foster the participation of citizens*." (Spain MAD)
- Provide more **resources for advice organisations** as well as energy awareness training of support staff (UK MAD) **and non-governmental organisations** that significantly complement the work of municipal social assistance centres (Poland VCSC);

3.6.2. Improving the training provided

ASSIST project draws the following proposals for improvement of training:

1. **Training and information provided have to reach large segments of society:** "*It is necessary to increase public awareness on energy poverty nearly through all societal sectors and stakeholders*". "*Mainly only a small group of NGOs working with vulnerable consumers is fully aware of energy poverty phenomenon in Finland*"; Many parts of the information require regular updating due to the nature of the learning contents. "*Lessons to be updated regularly to take into account changes in European and National directives and with National energy marke*t."
2. **Special training campaigns for intermediaries are highly needed**: "*Need to empower stakeholders from energy poverty related backgrounds on how to identify and assist consumers in energy poverty/vulnerability*". "*There is a strong need to have more energy poverty alleviation related projects and activities*". "*Extremely challenging to reach and engage operators from some sectors, such as health and finance sector but also big stakeholders from engaged sectors such as charities from the social sector …: such entities should be involved as partners since the beginning of the project, although it is not easy." "It is important to make a good identification and selection of Home energy advisors so they all are aware of the whole action: from training, action to evaluation.*";
   "*Strong need to increase awareness on energy poverty and empower actors with emotional bonds with the affected person. Beneficiaries are more confident with the HEA if they know them, so training professionals with relationship with the user has a bigger impact.*"; "*Around 40% of trained Home energy advisors in Barcelona region (Home care professionals and telecare professionals) are considered vulnerable consumers too. The training has empowered them to overcome the situation of vulnerability*."
3. **Energy advising, especially for vulnerable consumers, should be part of the professional engagement with careful assessment of the workload**: "*Home energy advisors from front line staff working in communities, money advice or the health sector responded well to the recruitment call but it was very hard to recruit volunteers that were already working in the community e.g. befriending schemes, as they felt they already had 'enough on their plate'*."; "*The expectations for the reporting on results were hard to communicate to the Home energy advisors alongside the practical training*"; "*High interest in the training for personal reasons but difficult to put into practice skills learnt unless already working in specific sectors: more time and budget should be devoted to address such issues*". "*All Home energy advisors trained in Barcelona region had the task assignment of ASSIST project during their daily tasks at work, which means paid hours to implement the project. This is a positive and replicable aspect as success rate is higher. However, not all of them have completed the training which means that, if there is not enough control from their employers, not all of them feel compromised with the projec*t."; "*Extra time needed to attend training sessions so possible conflict with Home energy advisors other commitments.*"; "*Detailed reporting on results could be felt as a burden*."
4. **Balancing the training curriculum between technical and social modules**: "*The practical orientation while important needs preliminary similar basis of knowledge. Technical participants are better prepared while social workers are more committed and most probably will continue to pass on the information*". "*Challenging to tailor lessons according to the different skills and activities of the HEA – too technical for some, too*

sectorial for others"; "*The background of the potential HEA essentially dictates what type of modules are relevant and this also affects the marketing angle for this particular group.*" "*Define the course structure and contents - the right mix of sectorial information and the right duration not to be too technical nor too superficial*"; The training should provide "*competencies and skills sufficient to advise and assist energy-poor consumers on the field*."

5. **Practical aspects of the training**: "*It has been a good practice to evaluate Home energy advisors through an energy intervention in their own households: energy bills analysis, energy audits, and recommendations*." (Belgium VCSC)

3.6.3. Measures to involve vulnerable consumers

- **Development of new forms and practices of more democratic decision-making** with (increased) involvement of vulnerable consumers. There is a need of: "*Empowering vulnerable customers (as part of the free energy scans) to choose the best tariff adapted to their circumstances and to deal with abusive commercial practices of energy companies (e.g. door-to-door marketing with misleading offerings).*" (Belgium VCSC).

3.7. Increasing knowledge and "evidence-based policies"

There is a need of further increasing and improving the research in the field of energy poverty. Many participants emphasized the lack of knowledge produced with participation of the energy-poor people as one of the basic causes for the weakness of the efforts to cope with energy poverty.

- One of the questions asked by participants was: "Why has the liberalisation of energy and gas market often is followed by an increase of energy prices?" Participants didn't reach convincing answer but obviously there is a need of **better knowledge about the causes of energy prices growth**, the state and operating of energy market and more precisely – market failures and the level (intensity) of competitiveness, as well as its impact on the dynamic of energy prices. There is a need of much more careful monitoring, analyses and appropriate state interventions.

  It would be naïve to rely on the "invisible hand" to establish the "normal" level of prices ("*the free market is not able to protect consumers, users and citizens.*" (EU VCSC): and it would be difficult (and perhaps – ineffective) to alleviate the impact of energy prices only through financial support of energy-poor and vulnerable consumers.
- There are opportunities to increase the efficiency of project-based interventions and reduce energy poverty by **deepen research on consumer's behaviour** (especially vulnerable consumers and energy-poor), by identifying different groups among them and checking energy poverty gap. Such a research could help to understand for instance whether these groups of consumers could actually profit from energy behavioural changes or other types of measures to reduce energy poverty are effective. This is important in order to alleviate the risk some energy poverty reduction interventions to adapt energy-poor to the condition of the main factors of poverty, and thus to poverty itself, instead to seek changes in the factors of poverty in order to mitigate poverty. Another such opportunity is to develop practices of participatory research in the field.
- **The legal framework and policies in the energy sector also need careful social impact assessment** in order to clarify their impact on the energy market, energy prices

and energy poverty. Some participants stressed the need to increase "*visibility of abusive commercial practices that have an impact on vulnerable consumers and to force companies to change their methods (without offering tricky rates to their customers)*." (Spain VCSC).

- Improved knowledge about the causes of energy poverty would contribute to **better interactions of different stakeholders and their capacity to search for adequate solutions** for issues that are currently subject to useless and fruitless discussions. Such change could also stimulate better development of policy measures against energy poverty. "*As it is now, energy poverty policy is mainly part of social policy, but some believe energy poverty policy should be an integral part of the regular economy (i.e. commercial banks providing the loans). There are proposals circulating to cut back the subsidies to the social sector for energy poverty alleviation. Also, distribution system operators in Flanders are under pressure to focus exclusively on core activities (i.e. managing the distribution grid)*." (Belgium VCSC). Also, it is important to improve the knowledge about consequences of energy poverty and more precisely – the impact of energy poverty on health issues.
- **Production of appropriate knowledge is also a premise for increasing the capacity of CSOs to participate in the fight against poverty**. ("*What is happening now is that existing reports come often from those stakeholders with enough resources (private companies…) but not from organisations (social charities or NGOs) who deal with the problem every day and have another dimension/vision of the reality.*" (ES). That is why It would be useful to promote studies, reports on energy poverty from different perspectives (social charities, NGOs, consumers associations, etc. Better knowledge and informing would facilitate involvement of the established networks in discussions on energy poverty in order to improve the "feedback**",** i.e. to transfer opinions and advice from vulnerable consumers to policymakers. This would contribute to the empowerment of vulnerable consumers.

3.8. Strengthening the evaluations of policy measures

The policy cycle framework emphasizes that evaluations of policies' interventions can make a significant contribution to improving the effectiveness of policies implemented, regardless of the field in which they are applied. Therefore, the assessments of the effectiveness of the implemented policies are considered an important ending phase of a policy cycle and the transition to a further (improved) cycle.

The ASSIST project also identifies a significant need for adequate assessments of policies to tackle energy poverty. Above all, assessments of measures tackling energy poverty can help overcoming the aforementioned policy problems.

- Some policies have **inappropriate or inefficient targeting**, resulting in policies failing to reach some of the most vulnerable households and thus insufficiently working towards alleviating energy poverty. "*Alongside this, the current design of policies – which largely depends on using the receipt of Government benefits as a proxy for fuel poverty – means that there is a 'stacking' of benefits on some households and a potential neglect of others*." (UK VCSC) There is also need of more comprehensive evaluations of the impacts of policies tackling energy poverty and their interactions with other, energy and non-energy related policies.

- Participants stressed that preliminary examination of effects of policy measures is necessary before changes of measures. "*However, the allocation criteria and decision-making process should only be changed if this results in a significant improvement of the allocation rate and the effectiveness of the process. More investigation is needed on what the impact would be of adapting the allocation criteria and the decision-making process.*" (Belgium MAD)
- The need for adequate assessments of the effects of the measures implemented to tackle energy poverty is also underlined by the other issues, concerns and disagreements that were mentioned in the previous sections of this report. Evaluations can help to better identify existing problems, to overcome existing disagreements and, ultimately, to improve policies. In particular, for example, evaluations can help advance the debate "*about spending priorities in UK: Is it better to fund direct but short-term financial help each year, or to finance the improvement of dwellings and make more lasting change? And, is it better to pay for these measures from general taxation revenues or through levies applied to fuel bills? In reality, a mixture of both approaches is preferable*." (UK VCSC). In the UK increases the interest to evidence the links between energy poverty and health conditions of the population. Consequently, work to alleviate energy poverty through improving the home environment (and thus improve the health of property tenants/owners) is now being shown to save the National Health Service a considerable amount of money through the preventative effects it can bring.

Evaluations are particularly necessary also to identify unexpected and undesirable effects of policies. A series of signs suggest that such effects arise:

1. "*Many energy efficiency programmes, innovations and advisory chains have actually worsened the indoors air-quality situation by promoting technical solutions, that lead the moisture to get entrapped to the building structures, enhancing mildew growth that causes respiratory diseases*". (Finland MAD)
2. Negative impacts on the environment: Energy poverty and policies tackling energy poverty can have a negative impact on the environment. For example, a report of the UK Centre on Sustainable Energy[35] stressed tensions between carbon emission reduction and fuel poverty and heating. "*A direct financial benefit to households can help to make bills more affordable for those struggling financially, but if, as a result of receiving a benefit, people will decide to heat for longer period during the day or to higher temperatures, their energy consumption and CO_2 emissions will increase. That's why the WHD [payment of the Warm Home Discount] is helping to reduce fuel poverty, but it could also result in increased carbon emissions. Besides, each year these policies provide a single, one-off financial benefit for households*." (UK VCSC)

   This statement suggests something important - energy poverty (and more precisely – high prices of electricity) can harm the environment, as poor people often burn carbon-intensive fuels to heat their inefficient homes.

   Similar effects can occur when not only energy-poor, but larger groups of people in low-income countries with cold winters strive to reduce their expenditures for electricity for heating (gas often is not available). Then they use cheap substitutes of electricity or gas

[35] CSE (2018), Tackling fuel poverty, reducing carbon emissions and keeping household bills down: tensions and synergies. Report to the Committee on Fuel Poverty https://www.cse.org.uk/downloads/reports-and-publications/fuel-poverty/policy/insulation-and-heating/policy-tensions-and-synergies-CFP-mainreport-may-2018.pdf

- such as coal, wood and others (for example, tires, as in Bulgaria) for heating. Such substitutes pollute the air with fine particles especially during winter and obviously the high level of energy poverty increases the use of such energy sources for heating. This is noted by some of the VCSC's participants. "*The problem of smog and low-effective heating devices was spotted as an issue closely connected to energy poverty*." (Poland VCSC)

The same can also happen in high-income countries. For instance, during past winters, Paris also reported heavy and long-lasting air pollution due to the combination of exhaust emissions from the cars and the heating of households with solid fuel, and banned the use of open fires at certain times.[36] In this case, the impact of heating of households with solid fuel is explicitly mentioned.

These effects of energy poverty are important, having in mind that a study concludes that majority of EU countries have significant levels of energy poverty and are not able to keep their citizens warm during winter. Energy poverty is especially prevalent in south and east of Europe. For instance, Bulgaria outstrips other countries for prevalence of four indicators – damp and leaky homes, high energy costs for households, inability to keep homes warm against winter and inability to keep homes cool in summer[37].

3. Impact of renewable energy production on (un)employment and as a consequence – on poverty, including energy poverty. The lack of clear data on the impact of the transition to renewable energies on (un)employment and poverty is another reason for stepping up policy assessments. It is supposed that increasing renewable energy production contributes to employment growth as it increases the number of jobs: *"the transition, if done correctly, could create millions of jobs in Europe*." [38]Not all research, however, confirm the validity of this argument.[39] Perhaps the explanation of these different opinions could be connected to the fact that green jobs often are created but not locally, which is a problem.
4. Assessing the impact of (and on) inequalities. "*Any new policy initiative at EU level should be subject to a distributional impact assessment to make sure that energy customers – especially the most vulnerable ones – will not bear disproportionate risks and unintended consequences*." (Eurelectric 2017: 9)

The proposals concerning the policy measures aiming at support of vulnerable consumers could be summarized as follows: there is **a need of decisive improvements of the existing range of measures and elaboration of a new policy mix addressing energy poverty in the EU**. This policy mix should be **multi-pillar** (addressing consistently its different causes), **multi-layer** (improving the policy cycle), **multi-level** (better aligning EU,

[36] See for instance: LeParisien.fr, Pollution : haro sur les feux de cheminée, 18 December 2019 http://www.leparisien.fr/environnement/pollution-haro-sur-les-feux-de-cheminee-18-12-2019-8219760.php

[37] Right to Energy (2019) New report: Majority of EU countries unable to keep citizens warm this winter https://righttoenergy.org/2019/02/20/new-report-majority-of-eu-countries-unable-to-keep-citizens-warm-this-winter/

[38] See for example European Commission, Green jobs – a success story in Europe https://ec.europa.eu/environment/efe/news/green-jobs-success-story-europe-2016-11-14_en

[39] For example, a research done by Green K. P. (2011) states that "Green programmes in Spain have destroyed 2.2 jobs for every green job created, capital needed for a green job in Italy could create almost five jobs in the general economy."

national and local policies) and **multiplayer** (strengthening the participation of relevant stakeholders and involving new participants)

Table 14 - Recommendations to policymakers

Recommendation	*Objective*	*Justification*
Multi-pillar approach	**Address consistently the direct energy poverty drivers and improve energy markets**	Better monitoring, analyses and appropriate interventions in energy prices setting are needed. Energy prices and their evolution have a direct and substantial impact on energy poverty and vulnerability. Incomes and social benefits need to be assessed against adequate minimum incomes, including energy costs. The levels of most of the available measures are insufficient. Regular assessments and updating of the levels of social benefits are necessary. Targeted support for housing energy efficiency has to be a high priority, including the increase of the supply of quality homes primarily in the lower segments of the rental markets and fast track to improve the efficiency of social housing. Careful review and analysis of the way energy markets are constructed (effectiveness of existing regulation/de-regulation; market opening and level of competition) and operate (how markets shape the energy prices); Strengthen the measures against unfair business and commercial practices. Stimulate new forms of ownership, such as energy cooperatives and prosumers
Multi-pillar approach	**Improve the consistency of policies that impact energy poverty**	**Financing a just energy transition requires a clear evaluation of its impact on different income groups**. General progressive taxation should be preferred over levies applied to energy bills. A simultaneous shift of the taxes from consumption to the kind of energy (sources) could also be relevant. Employment policies, if supporting low-quality jobs, put pressure on low-incomes, lead to growing income inequalities and result in increased energy poverty. Minimum incomes, including minimum salaries and wages, minimum pensions, and unemployment benefits need to be assessed on the basis of **minimum adequate standard of living**, including energy needs.

		Integrated approach and **meaningful collaboration** could fill in the current gaps between policies in different fields such as tax, employment, social and welfare policies and policies against energy poverty. **Social justice and environmental concerns** need to be considered together. A **careful assessment of the sequence of policy steps** is needed to balance the priorities and needs
Multi-player approach	**Develop better decision-making process and a broader involvement of the different stakeholders**	Boost **structured dialogues and feedbacks between the parties**, through **bottom-up energy experience**. Strengthen the **direct participation of NGOs, social workers and vulnerable consumers** in the monitoring of the causes, the state-of-the-art and the consequences of energy poverty. They should also get stronger stimuli to engage in policies formulation and implementation. Improving the interaction of stakeholders to better coordinate and strengthen the role of intermediaries is important to **stimulate social approval and public support for reform**.
Multi-layer approach	**Improve the "policy cycle" of relevant public policies**	Identification includes both: a) **the identification of causes of energy poverty** and b) the identification of **target groups**. Improved identification of target groups improves the legal framework, establishes an adequate minimum range of support and protection and provides more adequate criteria for monitoring. **Social impact assessments** and more intensive evaluations of policies against energy poverty, as well as the monitoring of their impact on inequalities and distributional effects, contribute to improving all the other stages of the policy cycle. Evaluations are particularly necessary to identify unexpected and undesirable effects of policies. Additional attention is needed to useful **feedback stemming from the evaluation to the identification stage**. Currently, many research and projects on EU, national and local level remain overlooked.
Multi-level approach	**Ensure better policy coordination of initiatives at EU, national and local level**	Clear guidelines and indicators at EU level are needed to help MSs to elaborate their national definitions and strengthen specific national policies; National Energy Policy Observatories, following the model of the European Energy Poverty Observatory, could be very useful for national developments and

	co-operation at EU level Address potential discrepancies between EU, national and local policies in order to address the root causes of energy poverty consistently; Encourage the transfer of best practice to Member States with high and persistent energy poverty levels.

Annexes

Annex 1: Inability to keep home adequately warm, share of population 2009-2018

(% of total - EU SILC data)

Table 15 - Inability to keep home adequately warm, share of population 2009-2018

GEO/TIME	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
European U	:	:	9.8	10.8	10.7	10.2	9.4	8.7	7.8	7.4
European U	:	9.5	9.8	10.8	10.7	10.3	9.4	8.7	7.8	7.4
European U	9.3	9.5	9.8	10.8	10.8	10.3	9.4	8.7	7.8	7.4
Euro area (E	:	:	8.8	10.1	9.9	10.1	9.4	8.8	8.0	7.6
Euro area (1	7.7	8.0	9.2	10.4	10.1	10.2	9.4	8.8	8.0	7.6
Euro area (1	7.5	7.8	8.9	10.1	10.0	10.1	9.3	8.6	7.8	7.4
Belgium	**5.1**	**5.6**	**7.1**	**6.6**	**5.8**	**5.4**	**5.2**	**4.8**	**5.7**	**5.2**
Bulgaria	64.2	66.5	46.3	46.5	44.9	40.5	39.2	39.2	36.5	33.7
Czechia	5.2	5.2	6.4	6.7	6.2	6.1	5.0	3.8	3.1	2.7
Denmark	1.5	1.9	2.3	2.5	3.8	2.9	3.6	2.7	2.7	3.0
Germany (u	5.5	5.0	5.2	4.7	5.3	4.9	4.1	3.7	3.3	2.7
Estonia	1.7	3.1	3.0	4.2	2.9	1.7	2.0	2.7	2.9	2.3
Ireland	4.1	6.8	6.8	8.4	10.0	8.9	9.0	5.9	4.4	:
Greece	15.7	15.4	18.6	26.1	29.5	32.9	29.2	29.1	25.7	22.7
Spain	**7.2**	**7.5**	**6.5**	**9.1**	**8.0**	**11.1**	**10.6**	**10.1**	**8.0**	**9.1**
France	5.5	5.7	6.0	6.0	6.6	5.9	5.5	5.0	4.9	5.0
Croatia	:	8.3	9.8	10.2	9.9	9.7	9.9	9.3	7.4	7.7
Italy	**10.8**	**11.6**	**17.8**	**21.3**	**18.8**	**18.0**	**17.0**	**16.1**	**15.2**	**14.1**
Cyprus	21.7	27.3	26.6	30.7	30.5	27.5	28.3	24.3	22.9	21.9
Latvia	16.4	19.1	22.5	19.9	21.1	16.8	14.5	10.6	9.7	7.5
Lithuania	24.1	25.2	36.2	34.1	29.2	26.5	31.1	29.3	28.9	27.9
Luxembourg	0.3	0.5	0.9	0.6	1.6	0.6	0.9	1.7	1.9	2.1
Hungary	8.9	10.7	12.2	15.0	14.6	11.6	9.6	9.2	6.8	6.1
Malta	11.1	14.3	17.6	22.1	23.9	22.3	14.1	6.6	6.3	7.6
Netherlands	1.3	2.3	1.6	2.2	2.9	2.6	2.9	2.6	2.4	2.2
Austria	2.9	3.8	2.7	3.2	2.7	3.2	2.6	2.7	2.4	1.6
Poland	**16.3**	**14.8**	**13.6**	**13.2**	**11.4**	**9.0**	**7.5**	**7.1**	**6.0**	**5.1**
Portugal	28.5	30.1	26.8	27.0	27.9	28.3	23.8	22.5	20.4	19.4
Romania	22.1	20.1	15.6	15.0	14.7	12.9	13.1	13.8	11.3	9.6
Slovenia	4.6	4.7	5.4	6.1	4.9	5.6	5.6	4.8	3.9	3.3
Slovakia	3.6	4.4	4.3	5.5	5.4	6.1	5.8	5.1	4.3	:
Finland	**1.3**	**1.4**	**1.8**	**1.5**	**1.2**	**1.5**	**1.7**	**1.7**	**2.0**	**1.7**
Sweden	1.7	2.1	1.9	1.7	0.9	1.1	1.2	2.6	2.1	2.3
United King	**5.8**	**6.1**	**6.5**	**8.1**	**10.6**	**9.4**	**7.8**	**6.1**	**5.9**	**5.5**
Iceland	1.0	1.4	2.0	1.5	1.4	1.8	1.4	1.6	:	:
Norway	0.8	0.7	1.2	0.7	0.9	0.6	0.5	0.9	0.8	0.9
Switzerland	7.6	7.3	0.7	0.4	0.4	0.7	0.6	0.6	0.4	0.6
North Mace	:	28.8	26.7	26.8	26.4	26.1	23.4	25.7	24.0	:
Serbia	:	:	:	:	18.3	17.1	15.2	13.3	13.1	10.0
Turkey	37.8	:	35.4	37.2	29.3	15.5	15.9	24.2	20.7	:

Source: Eurostat, EU-SILC survey [ilc_mdes01], extracted on 29.10.19

Annex 2. National Vulnerable Consumers Steering Committees' first meetings (2017-2018)

1. Is there a definition of energy poverty, of vulnerable consumers or people experiencing energy poverty?

Belgium	*"There are official criteria to measure three different types of energy poverty: "measured" energy poverty (based on the fraction of the disposable income spent on energy), subjective energy poverty (based on statements of not being able to adequately heat homes), and hidden energy poverty (based on the fraction of people that spend a very low amount of income on energy."*
Finland	"No official definition of energy poverty or vulnerable consumers in energy markets, in Finland."
Italy	"Work just published by RSE and Banca d'Italia on the fact that energy poverty is a phenomenon related to many interwoven parameters and therefore it cannot be related directly and exclusively to the income of the household (which is the criteria used nowadays in Italy for the eligibility of the economic support to the energy bill)…A definition of energy poverty needs to be drafted taking into account all the different aspects related to energy poverty, either temporary, economic and social." "The causes should be in fact clearly identified in order to be able to impact on the people "at risk" of energy poverty."
Poland	"Members of VCSC stated that we have a very general description of energy poverty in Energy Law, however, it seems to be far from the needs. Firstly, it is prescribed by the focus of general poverty and housing benefits for low-income groups. This criterion does not reflect the true situation and excludes households with average income but very high costs. Secondly, there is no differentiation between energy poverty and energy vulnerability. Therefore we can use it for social-aid purposes, but we cannot for prevention."
Spain	"The definition in the Spanish regulation is insufficient: the consumption and income thresholds are not enough for a dignified life. It also feels like a way to redefine a financial assistance but without getting into the main causes and consequences of the issue." "Identification is done by social services."
UK	"Fuel poverty in England is measured using the Low Income High Costs (LIHC) indicator. Under the LIHC indicator, a household is considered to be fuel poor if: • they have required fuel costs that are above average (the national median level) • were they to spend that amount, they would be left with a residual income below the official poverty line

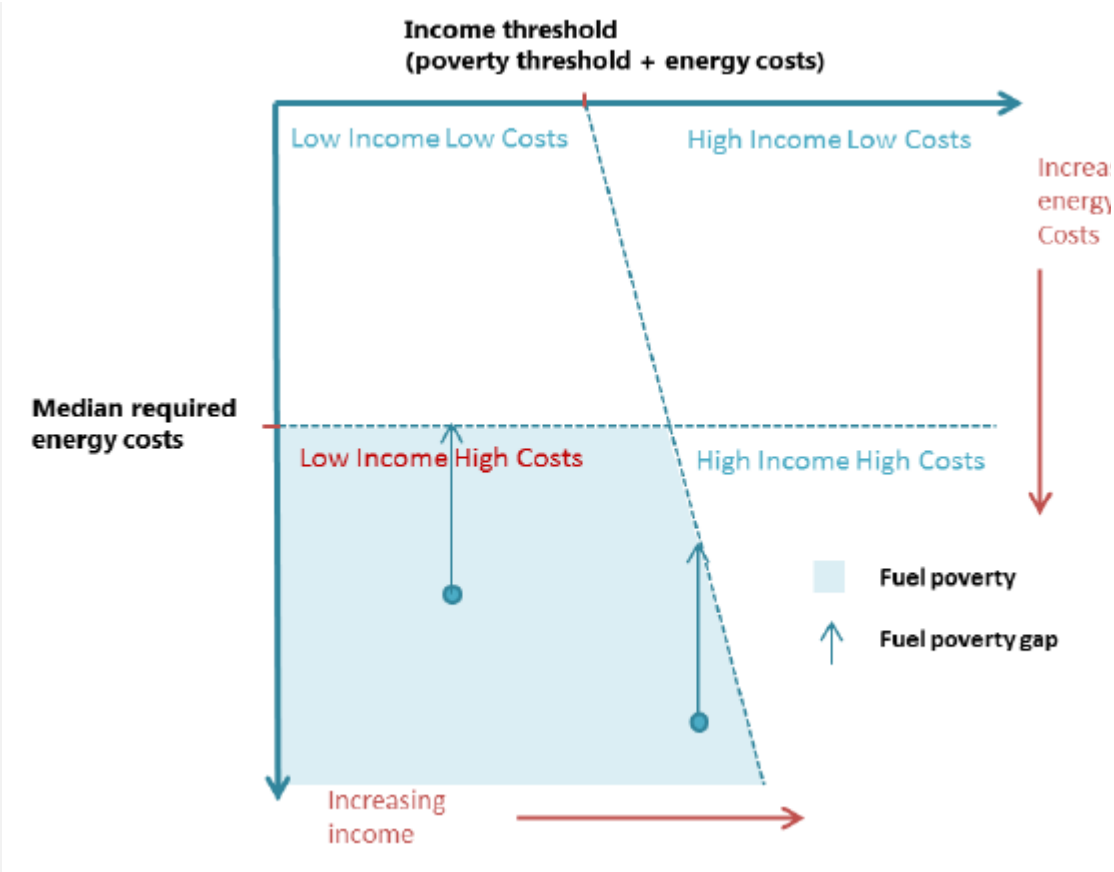

Figure 5 - Fuel poverty under the Low Income High Costs indicator

Low Income High Costs is a dual indicator, which allows us to measure not only the extent of the problem (how many fuel poor households there are), but also the depth of the problem (how badly affected each fuel poor household is). The depth of fuel poverty is calculated by taking account of the fuel poverty gap. This is a measure of the additional fuel costs (in pounds) faced by fuel poor households to meet the non-fuel poor household threshold. This is illustrated in Figure 1, where the indicator consists of:

- the number of households that have both low incomes and high fuel costs (shown by the shaded area in the bottom left hand quadrant in Figure 1.1); and
- the depth of fuel poverty among these fuel poor households. This is measured through a fuel poverty gap (shown by the vertical arrows in Figure 1.1), which represents the difference between the required energy costs for each household and the nearest fuel poverty threshold.

To get a sense of the depth of fuel poverty at a national level, the fuel poverty gap for each individual household is aggregated across all fuel poor households to produce an overall aggregate fuel poverty gap.

The fuel poverty indicator is a relative measure, as it compares households to national income thresholds and national median energy costs. A change in income will only have an impact on fuel poor households if they see relatively larger income changes (increase or decrease) than the overall population; the same is

true for household energy costs. As a result, the proportion of households in fuel poverty remains, on the whole, stable over time, whereas the fuel poverty gap (which is measured in pounds) is more closely linked to changes in energy prices and the economy and therefore, a more informative measure when looking at the direct impacts of fuel poverty over time.

In December 2014, the Government introduced a new statutory fuel poverty target for England. The target is to ensure that as many fuel poor homes as reasonably practicable achieve a minimum energy efficiency rating of a Band C, by 2030. To support the implementation of this target, the Government published 'Cutting the cost of keeping warm: a fuel poverty strategy for England', in March 2015. The strategy also set out interim milestones to lift as many fuel poor homes in England as is reasonably practicable to Band E by 2020; and Band D by 2025, alongside a strategic approach to developing policy to make progress towards these targets."

2. **Are there differences in the understanding of the phenomenon between the social and the energy actors? What are the main points on which the social and technical actors agree and/or disagree? What brings them together and what divides them?**

Belgium	*n/a*
Finland	"Energy sector actors highlight the fact that electricity is relatively low cost in Finland. Social actors in turn highlighted that the feedback and experiences they are getting from consumers, is that rising housing costs, electricity especially electricity distribution being among them, is a problem for people."
Italy	"In Italy energy poverty has only recently gained importance, in 2017 the term was introduced in the national energy plan (SEN) for the first time. However, actors working in the energy sector are more acquainted with the terms and meaning of energy poverty in relation to the actors in the social sector who are still mostly unaware of the social phenomenon." "Their views differ on the evaluation of the perimeter of energy poverty in Italy, with social sector and consumers association preferring a wider approach with higher figures and focusing more on prices and market behaviours, and energy sector more focused on the technical aspects"
Poland	"The variety of institutions represented in VCSC resulted in multi-perspective vision of energy poverty itself. Administration seems to be focused on legal and administrative measures to tackle energy poverty, like public aid for energy poor and programs aimed on energy efficiency. However, they signalized the problem of long-term financing and complicated structure of housing ownership (especially in case of municipalities owning whole or part of buildings in bigger cities). Industry representatives stressed the need of linking energy poverty and energy efficiency with consumer safety, and safety of energy system itself (blackouts, deficits of power and the need for the tools for consumers to save energy in rush-hours). Social representatives put their attention on the behavioural issues and consumer advising and education. Also, the problem of smog and low-effective heating devices was spotted as an issue closely connected to the energy poverty."
Spain	"The energy sector focuses on the technical aspects of the issue, while the social entities concentrate on the origin of the problem: the economic inequality and its impact on the families' capacity to meet their energy basic needs… They complement each other from a different understanding of the problem." "Tension between profit v/s social responsibility; "It would be great to have a professional profile with both technical and social knowledge to have a big picture of the complexity of the problem and be able to apply long-term solutions."
UK	"The government in the UK has worked hard over several years to include the main players in the energy sector in their work to alleviate fuel poverty. This has resulted in schemes such as the Energy Company Obligation (ECO) and the Warm Homes Discount. Ofgem, as the regulator of the energy market in the UK, holds regular round tables and working groups with representatives from the

energy industry, consumer groups and fuel poverty groups. Below is a summary from Cutting the Cost of Keeping Warm, March 2015 of some of the work Ofgem are undertaking:

Following their review of payment differentials in May 2014 Ofgem hosted a roundtable in October 2014. There was broad consensus from suppliers, consumer groups and fuel poverty groups that payment differentials was a complex issue and that any changes to the rules would create winners and losers with no clear benefit to fuel poor consumers. A significant proportion of fuel poor households pay for their energy through direct debit. For example, of households who were fuel poor in England in 2012, around 48% paid for their electricity through direct debit and 49% of those using mains gas paid for it in the same way. At the same time around 27% paid for their energy (both electricity and mains gas for those that have it) through prepayment meters. Changing the rules in favour of pre-payment meter customers would make fuel poor direct debit and standard credit customers, who make up a greater proportion of fuel poor, worse-off. Therefore, the net effect is unclear.

Ofgem is reviewing a number of services provided by energy suppliers to help ensure that vulnerable consumers get the most out of the energy market. For example, Ofgem is reviewing the communications between suppliers and customers in debt. This is to ensure that energy companies are treating customers fairly and clearly communicate customer's rights and choices.

Ofgem are also undertaking a review of industry telephone service provision. Concerns have been raised about the cost of calling essential services, particularly for those on low incomes and those without access to the internet. Ofcom is introducing new rules around free phone numbers in the summer. This will make calls to free phone numbers (0800, 0808 116) free of charge from mobile phones. Ofgem will consider this change as part of their review, which will include an assessment of what numbers suppliers use for different services, and how easy those numbers are to find both online and on bills and annual statements."

"Of course, there will always be a division between the social and energy actors due to the paradoxical situation that in helping to improving the energy efficiency of properties, the amount of energy required from the suppliers will reduce, thus affecting the income of the energy suppliers in a negative way."

3. What are the main issues dominating the energy poverty policy agenda? What are the main concerns? What are the positive aspects?

Belgium	*"Energy poverty policy is predominantly aimed at alleviating the symptoms of energy poverty, as opposed to tackling the causes at the root of the problem. The financial instruments available for energy-efficiency improvements are in general not taken up by vulnerable customers. Some believe that the installation of a budget meter stigmatizes the customer."*
Finland	"There is a risk of overlapping policies, in the case that energy policy and social policy are not kept separate". "Disagreeing views came of adequacy of these measures, e.g. the level of basic welfare to cover necessary costs and whether or not the social security measures reach the everyone in need".
Italy	"There are concerns regarding hidden energy poor consumers: in particular, those disconnected to the grid – thus not able to even request the bonus – especially with regard to natural gas. There is a risk of excluding a big part of the energy poor consumers, if specific actions for disconnected are not planned."
Poland	"All participants agreed that the awareness level of the consumers is not satisfactory and that direct consulting / advising is strongly needed. Consumer education and access to knowledge sources can be the common factor for all market actors, including consumer organizations, administration, utilities and consulting agencies." "The way energy poverty is identified does not reflect the true situation and excludes households with average income but very high costs." "Representatives of Ministry of Energy and Energy Regulation Office stated that a special government task-group have been launched recently to elaborate the definition problem and propose it in a new wording. Possibly, after their work the overworked proposal will be consulted by NGO's and industry."
Spain	"Challenge of communicating the main changes in the regulation related to energy rights and vulnerability"; "Need for better coordination of different actors involved: public administration, social and private sectors"; "Inconsistencies in the legislative framework; need for clear legislation that enhances citizen's rights and entitlements" "Slow implementation; main burden on local administrations, which don't have enough resources"
UK	The following text is taken from "Tackling fuel poverty, reducing carbon emissions and keeping household bills down: tensions and synergies Report to the Committee on Fuel Poverty", CSE, June 2018 "There were three key policy tensions identified as part of the policy assessment, and these are summarised below. It is important to note that these are not isolated tensions and that there are overlaps and interactions between each one. For certain policies, several of these tensions occur together, compounding the effect.

1. Carbon emissions reduction versus fuel poverty (and warmth). A direct financial benefit to households can help make bills more affordable for those struggling financially. However, some households might spend a proportion of the benefit to increase the level of warmth in their homes. If, as a result of receiving a benefit, people decide to heat for longer during the day or to higher temperatures, their energy consumption and CO2 emissions will increase. In addition, each year these policies provide a single, one-off financial benefit for households each year. Policies which install energy efficiency measures reduce the energy required to maintain pre-improvement levels of warmth in homes targeted by such policies, and make lasting improvements for the inhabitants of improved homes. Any policies providing a financial benefit for households will need to be repeated each year to continue the benefit. Nevertheless, the WHD payment is taken into account when calculating fuel poverty status of households, so while it could result in increased carbon emissions it is also simultaneously helping to reduce fuel poverty.

2. Inappropriate targeting of measures. It is recognised that accurately targeting assistance to fuel poor households in England is difficult; the number of households in fuel poverty is a statistically derived number. Nevertheless, several of the policies that were reviewed have inappropriate or inefficient targeting, resulting in policies failing to reach some of the most 4 vulnerable households and thus insufficiently working towards alleviating fuel poverty. Alongside this, the current design of policies – which largely depend on using the receipt of Government benefits as a proxy for fuel poverty – means that there is a 'stacking' of benefits on some households and a potential neglect of others.

3. Spending priorities: potential for better use of spending, particularly tax revenues. The debate here is two-fold: is it better to fund direct but short-term financial help each year, or to finance the improvement of dwellings and make more lasting change? And, is it better to pay for these from general taxation revenues or through levies applied to fuel bills? In reality, a mixture of both approaches is preferable. However, for the former point, the current balance appears to be weighted too far towards tax funding of short term financial help, with less financing of programmes to make lasting changes to the housing stock and peoples' long term warmth'".

4. Are there measures in place for supporting vulnerable consumers?

Belgium	*"Several measures are in place: a social tariff for vulnerable customers, a system of free energy scans, cheap loans for energy efficiency investments, etc."*
Finland	"Finland has one of the most extensive welfare systems, designed to guarantee adequate living conditions."
Italy	"Several measures supporting the payment of the energy bill, based on income criteria; several financial measures to support the take up of energy efficient measures in the household which are not specifically addressing energy poor or vulnerable consumers; support of social organisations economically help people in need who are not able to pay for their energy bills by paying the bills themselves."
Poland	"… main problem of energy poverty. First of all it is lack of the financial support addressed to a vulnerable consumer (except energy supplement and supplement for house). Second one is common problem of poor condition of residential buildings and the need to carry out thermo-modernization, which requires large financial outlays."
Spain	"Training of social workers, energy rehabilitation, corporative volunteering, discount rate (bono social) - the challenge is to effectively inform users about their rights so they can claim them".
UK	"There are several national and local initiatives and projects in the fight against energy poverty already in place in the UK. There is a strong split between those initiatives that offer financial assistance and those that offer advice and support. Many of the existing schemes concentrate almost exclusively on financial aid to those consumers who meet certain criteria related to low income and/or energy poverty. Many of the projects and schemes that offer advice and support to vulnerable consumers also play a role in which they help the consumers gain access to the financial aid." "National Initiatives: The national initiatives fit into two main types; the first is financial aid where funding is provided to help consumers to (partially) pay their energy bills, and the second type consists of not-for-profit organisations who undertake a combination of advice provision, lobbying government and research. The initiatives where funding is available are sometimes difficult to access for the general public, let alone the most vulnerable in society. A combination of factors such as lack of awareness, over-complicated application processes and constantly changing parameters and eligibility for the funding makes take-up limited in some cases. This is where there is a role for the other support agencies to help vulnerable consumers access the grants. The national support agencies offer broad advice in terms of accessing funding and general energy efficiency measures; however it is often the more local organisations that have the capacity to actually guide vulnerable consumers through the process of saving money on bills and accessing grants to make energy efficiency improvements to their properties." "Local Initiatives: As discussed in the previous section, it is often the local organisations that have the specialist knowledge, and capacity, to help people with customised advice and guidance in accessing grants. Government and energy supplier funding schemes can often be too complicated or onerous for

vulnerable consumers to reach independently, and local authorities do not have the capacity to offer assistance, especially during economic times of austerity where cutbacks on public spending have been severe. Against this backdrop, local organisations can offer vital services to people such as (but not exclusively):

- Energy-saving and efficiency advice
- Help to access grants for insulation or providing information about renewable technologies.
- Assistance in switching energy tariff or supplier
- Help to find local installers and tradespeople
- Free home energy visit
- Training for 'front-line' staff in recognising the signs of energy poverty in consumers' homes

With their local knowledge and experience of delivering existing projects that have synergy with the aims of the ASSIST programme, these agencies may be best placed to manage volunteers (in collaboration with other public and charity sector organisations) to achieve the goals and targets of ASSIST."

5. Policy recommendations for the area of energy poverty

Belgium	*"There are a number of structural reasons for energy poverty problems in Flanders: poor quality of buildings (especially those buildings on the market for people with low incomes), high share of vulnerable customers on the rental market (with 'split incentive' problems: owners have to invest in energy efficiency measures, while the tenants enjoy the benefits of those investments, and generally cannot afford a higher rental price if the owner decides to recuperate the energy-efficiency investment). These structural problems should be tackled with a high priority"* *"Energy poverty policy is the subject of an 'ideological' battle in Flanders. As it is now, energy poverty policy is part of social policy, there are those who believe that measures to alleviate energy poverty (e.g. zero interest energy loans for efficiency improvements), but some believe energy poverty policy should be an integral part of the regular economy (i.e. commercial banks providing the loans). There are proposals circulating to cut back the subsidies to the social sector for energy poverty alleviation. Also, DNBs in Flanders are under pressure to focus exclusively on core activities (i.e. managing the distribution grid). Energy poverty policy should remain a part of social policy."* *"Empowering vulnerable customers (as part of the free energy scans) to choose the best tariff adapted to their circumstances and to deal with abusive commercial practices of energy companies (e.g. door-to-door marketing with misleading offerings)."*
Finland	"Ensuring that energy price is kept fairly low or increasing the level of basic welfare"; "Need to better define target groups in order to reach groups that are now left out of the existing energy advisory services" "Energy efficiency subsidy for households while relevant was discontinued couple of years ago"
Italy	"Most of the participants agreed on embracing a holistic approach to fight energy poverty – and they are concerned of a merely financial approach. In particular, participants have emphasized the need and importance of energy efficiency in housing."
Poland	"Energy Poverty issue is legally linked with poverty in general, economic sense. Tackling of this problem is mostly based on removal of effects, but the system is not prepared for prevention." "Energy vulnerability support schemes depend a lot from short-term programs, like house insulation or RES installation support, but there are no durable, long-term solutions." "Huge group of energy vulnerable (or affected by poverty) consumers live in municipality-owned buildings, with a very limited influence and impact. Activity of local authorities seems to be a must in tackling of energy poverty problem." "Solutions for energy vulnerability and preventing of energy poverty have to be

	implemented before full liberalisation of energy and gas market (regulated tariffs or social tariffs needed)."
Spain	"A state-wide legal framework bringing into line the different efforts to tackle energy poverty and promote energy rights. The regulation should establish a minimum range of support and protection with national scope, not related to the locality of residence of the citizens." "To impulse sustainable measures, both in housing policy and in dissemination strategies; proper buildings' regulation; a public understanding of energy rights." "Visibility of abusive commercial practices that have an impact on vulnerable consumers to force companies to change their methods (without offering tricky rates to their customers)."
UK	"In their fuel poverty strategy document "Cutting the Cost of Keeping Warm", March 2015, the Department of Energy and Climate Change stated that 'tackling fuel poverty means facing up to a number of clear challenges. These challenges can be summarised as follows: • improving energy efficiency standards in fuel poor homes; • working together to help the fuel poor through partnership and learning; • increasing effective targeting of fuel poor households; • improving the reach of support to certain high cost homes – such as non-gas or park homes; • improving the reach of support to certain low income households – such as those who have health conditions linked to living in a cold home; • tackling the financial burden of energy bills for those on low incomes; • ensuring the fuel poor are able to get maximum benefit from a fair and functioning energy market; and enhancing and improving understanding of fuel poverty."

Annex 3. National Vulnerable Consumers Steering Committees and Market Stakeholders' Dialogues' second meetings (2018-2019):

1. Do current policies respond adequately the three essential drivers for energy poverty: prices, incomes and the quality of buildings?

Belgium - VCSC	*a) Energy price: The energy price is insufficiently anticipated by the policy, for example the calculation of renewable energy. Pure energy prices have fallen, but customer costs have doubled in the past 10 years. Energy bill has become much more complex and unclear.* *Different interests in social sector and energy sector (profit). If energy efficiency increases, revenues for the energy sector decrease. It is the task of the government to keep this under control. Need for "social energy sector". There is too little knowledge about energy at OCMW, CAW, SKV, SHM, which means that there is a wrong attitude, for example with regard to composition rate.* *b) Income: Minimum wages are too low (below poverty line). Debate about taxation is needed, wealth tax is necessary. Fiscal measures are for the well-to-do class, e.g. tax benefits for electric vehicles - Matthew effect. Only 1.3% of the distribution cost is for social public service obligations, but people in poverty do pay for green energy.* *c) Quality of homes: Social housing is also of poor quality. There is a need for more operational resources and checks on sound implementation.* *More support is needed for emergency owners, for example assistance with investments, higher premiums and pre-financing for energy renovation.* *Expand target group of protected customers.* *More effort on demolition and reconstruction instead of renovation.* *Renewable energy must be made available to vulnerable customers.* *A lot more sensitizing for landlords. Linking the quality of the home to the maximum rental prices and additional control to enforce this.* *Promoting co-housing without loss of income e.g. with living wage.* *Co-housing is inaccessible to people in poverty, among other things because of the status of cohabiting. That status must therefore first be reformed before this type of housing can be promoted. In addition, there are other barriers that make co-housing inaccessible for people in poverty. They must also be tackled.* *Conventional rental system: owners rent a quality home to a well-defined target group below the market price. In exchange, they receive an advantage (e.g. premiums or tax deductions).*
Finland: VCSC	The participants felt that Finland has successfully responded to the challenges related to energy poverty. This was backed up by Eurostat data that shows Finland having the lowest rate on energy poverty of all EU countries. The latest

	activities of increasing resources to the publicly funded, free-to-use energy advisory services and the various multidisciplinary efforts to keep the energy prices low in Finland were considered successful approaches in keeping the energy poverty levels low. The Finnish social welfare system received endorsement for its inclusiveness. Especially the new development where the social welfare benefits are served from a one-stop-shop service points of KELA was endorsed for reducing stigmatization and making the information flow easier for the customers. The long tradition of high-quality building standards was also considered to be already functioning approach for keeping the energy poverty levels low in Finland. Overall the consensus among the Vulnerable Consumer Steering Committee of Finland seemed to be satisfied with the current policies and public means of alleviating energy poverty in Finland.
Finland MAD	“The basic fees for electricity distribution have increased after the decision to make the distribution networks more resilient by digging the cables into the ground. This has caused large investment requirements and increase in customer fees especially in the rural areas, which already have higher risk for energy poverty.”
	“The electricity distribution fees represent majority of rural electricity bills. The costs are high even if the consumption levels are very low. Especially the basic fees of distribution have risen a lot in the recent years, and this will end up stressing vulnerable households economically no matter how energy efficient or low-consuming the households would become. More focus has to be put into ensuring lower distribution basic fees in the future.”
	“Project-based execution is problematic, since the materials and expert networks quickly stop from existing after the project has ended. It would be more reasonable to have projects that produce something useful for existing networks that keep on operating even after the project is finished. The local context should be better assessed before making long-term project commitments.”
	“In Finland the in-house air-quality issues are very problematic. Many energy efficiency programs, innovations and advisory chains have actually worsen the indoors air-quality situation by promoting technical solutions, that lead the moisture to get entrapped to the building structures, enhancing mildew growth that causes respiratory diseases. The HEA program may also contribute to this problem, if the trained advisors are not qualified enough in the building construction engineering”
	“Each building in Finland goes through many phases of renovations under the management of multiple generations. The energy efficiency renovation principles stay the same, even if the technical solutions change. Households should be encouraged to make long-term decisions when it is economically feasible. “
	“Majority of the population would have the financial resources to implement energy efficient renovations, but they may lack expertise about the most feasible options. Even these people who are rather easy to serve are not being offered sufficient level of information about where to get assistance in planning and implementing energy efficiency renovations. It could be more meaningful to

	fix the service for these people first and then innovate new mechanisms to also include the vulnerable consumers to be served better." "The fact that HEAs invest their time in getting trained, travel a lot to reach the vulnerable households, spend significant amount of time figuring out the technicalities in the houses, conduct ex-ante questionnaires, take responsibility in recommending actions for the inhabitant and then travel back and spend time on reporting the results is mostly organized as normal salary work in Finland. It must be difficult to find people to do this on a voluntary basis."
Italy - VCSC	The committee members pointed out that current policies do not seem to have a strong impact on the three drivers of energy poverty: prices, incomes and quality of buildings. The participants pointed out that the energy bill is still particularly high for consumers, and that is also due to the importance of the component of system charges - which essentially constitute a sort of flat tax, not being progressive. As far as incomes are concerned, the integration of the guaranteed minimum income ("Reddito di Cittadinanza") with the energy bonus can help some vulnerable consumers but it is not able to specifically tackle energy poverty, in particular for large families. With regard to the quality of buildings, VCSC emphasized the need for a fast track to improve the efficiency of social housing.
Italy – MAD	HEAs are actors on the field and are not political actors, however from their experience there is a strong need to provide support to consumers in energy poverty as these people are unaware of existing financial (such as the energy bonus) and non-financial support schemes (such as Sportello del Consumatore). HEAs actually find that energy poor consumers are in need of financial and non-financial support and pointing to the fact that actual policies do not respond to their needs. According to market actors, those drivers of energy poverty are not really addressed by current policies. In particular, they are more concerned about quality of buildings, which is considered to be the most important issue.
Poland – VCSC	We discussed that there is still no definition of energy vulnerability in Poland. Contrary to the assurances we heard from representatives of the state administration on the previous Steering Committee, it was not created. And the concept is crucial. It is based on NECPs in the part concerning activities and programs related to the reduction of energy poverty. Diagnosing the phenomenon is also stiff. Receiving hard, reliable data is difficult. Of course, research is being carried out, and groups of consumers are indicated who may be exposed to energy poverty. Also in the implemented project very thorough research was carried out. Their results have been passed on to all potentially interested in problem of poverty. We discussed them at the previous meeting of the Steering Committee. At the second meeting, we discussed how the help for vulnerable consumers should look like. Each participant reached for his own experience and knowledge**.**
Poland – MAD	We presented the issues raised at the meeting of the Steering Committee, including issues of in-depth material deprivation. We talked about these indicators with assistance organizations. These indicators show that the assessment of a particular case is more complicated than the income indicator.

	The official data of the Central Statistical Office (GUS) regarding poverty in Poland has been presented. The financial situation of the Poles is improving from year to year. In 2017, the percentage of people who lived in extreme poverty decreased from 4.9 percent to 4.3 percent. The situation of large families, residents of rural areas and people with basic education improved the most. Against this background, the ASSIST projects and other studies on energy poverty are interesting. Creating a definition of energy poverty, as stated by the participants of the meeting, is not easy – but necessary. In-depth material deprivation is determined based on the inability to satisfy, for financial reasons, at least 4 out of 9 needs recognized as fundamental in European conditions. Two of these indicators are important from the point of view of energy poverty - timely payment of fees (bills) and heating of the apartment according to needs. Poverty data should also include these indicators. Connecting a household to central heating can increase thermal and health comfort, but at the same time increase the scale of energy poverty. Own heating with a stove was cheaper, though ineffective. Such situations must be taken into account when connecting homes to the heating network. Also the issue of the release of tariffs. As European experience shows - this influenced the increase in costs and, accordingly, the amount of bills.
Spain – VCSC	The members of the Spanish steering committee agree with the fact that the current policies in place to tackle the energy poverty in Spain are not sufficient and do not respond in an appropriate manner to enhance the situation of the vulnerable energy consumers. The responses provided point out the following reasons: • There are no political measures tackling directly the high prices of the energy. Furthermore, the energy pricing system lacks transparency for the majority of stakeholders. • The current policies are mainly focussed on the assistance of consumer and do not tackle the real causes of the problem. • The measures in place are partial measures that don't address the problem and its causes as a whole.
Spain – MAD	The general opinion of the attendants is that the current policies do not respond appropriately to the energy poverty issue. There are some measures in place in Spain to aid vulnerable energy users, but those measures are focused in palliating the consequences of the issue and do not tackle the real causes of the problem. The policy measures in place just provide economic assistance to pay back the energy debt to the energy companies, this only alleviates the problem temporarily and do not help the end user to overcome the energy poverty. Energy prices are not discussed or tackled by the current policies and no initiatives are addressing this issue. Furthermore, the quality of housing is a considerable problem, especially among the vulnerable users who, most of the time can't afford the necessary reparation works at home and therefore can't access to the housing rehabilitation subsidies – which imply an initial investment from the end users-.

	Therefore, the current policies are not perceived as useful for the vulnerable consumers, as they don't tackle the causes of the problem and sometimes, they are not even accessible for the energy poor. The policies should be reformulated and redesigned with the perspective of the energy as an essential right and should take into consideration important aspects such as low family incomes or new energy prices policies so that they could be effective. There are not enough policies addressed to improve the efficiency of the buildings, nor to install self-supply systems or to optimize domestic climate and energy installations. The electric social discount is not enough and there is no social aid directly addressed to the refurbishment of buildings. The bottom line is that the design of current measures does not consider the energy as a right. Essential aspects such as the families' low incomes, their access to good quality employments or an effective regulation of the energy prices are not usually taken into account in direct relation to energy poverty. On the short term, the electric and thermal social discounts seem to be the only response and in some cases they are difficult to formalize or become inaccessible for vulnerable families. More public funds need to be addressed to the energy efficiency and refurbishment of the housing stock. To generate solutions on the long term, more attention should be paid to the price of energy and the job creation.
UK – VCSC	The discussion focused on quality of buildings and how to improve the standards. There is some policy in place at present but the group are not sure if it is fit for purpose and fit for need. Building regulations for new build is of a standard but this could be better. However, this takes government commitment. Maria Hickman of Stroud District Council stated that "new builds have regulations but we have a vast majority of old build (pre 1919). Funding (ECO) for Loft Insulation and Cavity Wall Insulation is good but solid wall needs much more funding than it is getting to make it feasible. So our housing isn't being properly addressed by policy". Calum Allen from South Gloucestershire Council made the point that "in particular the MEES for private rented has lots of loop holes for old 'listed' properties, making them exempt from improvements to lift EPC, so things aren't improved for the people". ECO needs to progress and more funding needs to come from the utility companies and to be paid out of their profit to cover expensive works like Solid Wall Insulation. The best time to do any major retrofit works is when you are planning to do other work e.g. replacing a kitchen for example. Could this be brought into legislation? It's a huge leap for the population to renovate, so it needs to be a requirement. MEES/ BEIS information is not good – their database information is massively inaccurate. If an EPC is less than 10 years rental agencies don't have to do new ones so they can be very out of date. Social housing providers are way ahead as they are aiming to have all stock reaching a 'C' EPC rating. All property should be free of Category 1 hazards – but this is only enforced in privately rented and not in owner occupiers who can often be on low income. In comparison to EU our energy company control may be good but energy

UK - MAD	prices keep increasing. We need more than the price cap from the Government. Energy companies are quick to put prices up and slow to put them down. SB- The key issue for deaf people is low incomes as they are at greater risk of being under or un-employed and therefore have no way of increasing their incomes with energy prices rises. In addition, because of difficulties with written text, online information about cheaper tariff is difficult to access IH- Low income is an issue as many people with learning difficulties do not have the opportunity to increase their income through work. Many members have support workers looking after their finances including paying energy bills so do not have anyone checking for the best energy tariffs for them. SM- They are impacted by all reasons. Particularly impacted by being quite sedentary at home and also heating controls are not Visually Impaired (VI) friendly. Thermostats, programmer etc.

2. **How should social protection of vulnerable consumers be strengthened to cope with energy poverty?**

Belgium - VCSC	*People with the biggest problems do not end up in social housing but are homeless. The number of homeless people in Belgium is on the rise.* *Minimum energy supply, but you still have to pay 10A yourself. This must be automated so that all municipalities / OCMWs follow the same method.* *Closing is not an option.* *More control from energy suppliers is needed. Energy suppliers do what they want, pay back when they want and are not given a notice of default.* *There is a need to pass on costs for more social public service obligations instead of benefits of, for example, renewable energy for the most well-off.* *With budget meter, equal advances are lost throughout the year. In the summer, income is spent on other things.* *"Undoing rate" budget meter is too high, so people with budget meters do not have access to the cheapest rate on the market.* *Unclear where money from the energy funds of OCMWs goes. There is a need for a uniform system over the OCMWs.* *Expansion of the social rate for all people with an increased allowance and calculation based on income instead of market price.* *Raise the lowest incomes.* *Increase the supply of quality homes (especially in the lower segments of the rental markets).* *Promotion of comparison tools and group purchases encourages Flemish people to look for the cheapest energy suppliers on the market. However, the campaigns that have to convince people to find the cheapest supplier or to*

	compete through group purchases do not reach the consumers who need it the most. People in poverty are not easily reached via leaflets, commercials or internet campaigns. To reach them, work must be done through intermediaries that people also trust, for example through a community centre, housing assistance services or a debt counsellor. These intermediaries often do not have the time to pay attention to energy. *By working via budget meters, debt repayment is only done with regard to energy. The other debts are not charted and therefore insufficiently taken into account. Someone, for example, succeeds in paying off his energy debts, but often threatens to incur more debts at other posts or to get further into trouble. In debt counselling, all debts of a person must be mapped out and an integral approach must follow that is feasible for the debtor (e.g. in terms of repayments).*
Finland: VCSC	In general the situation in Finland was considered to be rather good in terms of social protection against energy poverty. The most credit for the overall situation in the social system was given to KELA and municipal social welfare services that generate most of the services applicable for vulnerable consumers. Also the advisory service chain that includes public cost-free energy advisory, renovation advisory, purchase advisory, funding advisory and maintenance advisory services were considered to be quite extensive and well-functioning network of assistance. The role of municipal social welfare organizations were mentioned as very important actors in the system, since they are responsible for funding and organizing half of the basic welfare programs and all of the preventive and supplemental welfare support. Municipalities also control the regional housing policies, which according to decisions can alleviate or worsen energy poverty in the area. The housing policies were recommended to be monitored as a whole, since ensuring affordable housing is financially supported in many stages as subsidies for housing construction to welfare benefits for low income inhabitants. Room for improvement was seen in the information dissemination to detached house owners. This is being currently developed by extending the cost-free energy advisory services to new regions with the support of Energiavirasto and coordination of Motiva.
Finland MAD	“The bottle neck of assisting energy poor consumers is not the lack of advisory services. The problem is in reaching the vulnerable households. Advisory organizations have actually currently more resources than they are able to use due to the lack of support requests from the vulnerable consumers. Sometimes the campaigns should be addressed to the relatives of vulnerable consumers, so they would take action instead of the sometimes-passive family or individual that would benefit from the advisory contact.” “It is good that energy advisory services are being expanded beyond energy experts. This provides cross-sector knowledge and problem-solving capacity while reaching new customer segments.”

	"When talking about poverty the discussion should be very much about money. Where to get money for renovations, how quickly will the investments pay themselves back, what are the most feasible renovation investments for vulnerable households, how to ensure cheap and good quality results of renovations etc."
	"The people who have things well sorted are usually way more interested about energy efficiency, than vulnerable consumers that actually would most benefit from the related services. People in poverty many times experience that they cannot afford to make any upgrades in their energy efficiency without the access to assistance in forms of financing. The focus should be put on benefits directed to low-income house energy efficiency renovations. No amount of good quality information will get people to make expensive renovations, unless there is a realistic way to finance the workings."
	"Information accumulates quickly and all advisory related materials require very frequent update loops to stay relevant."
	"One of the big risks in the energy efficiency renovation industry is the part of private sector, that works immorally. There are commercial operators that push for the services and products they have even if those solutions would not be optimal for the building owner. As a part of the renovation advisory work VTKL workers have had to cancel and redo useless or harmful renovations done by door-to-door salesmen. Especially old people are getting tricked to buy solutions that are not really helping the households to save money in the long run. Offers may be the wrong solutions in the first place, may be overpriced and the quality of work may be inadequate. New solutions to prevent immoral commercial practices among energy renovations need to take place."
	"Availability of cheap energy services may require other types of approaches, such as snow - plowing and other improved maintenance of rural roads to allow energy logistics in the first place. Elderly may benefit more from house visits that assist on common issues, such as help in reading letters, paying bills, cleaning, scheduling of visits, arranging logistics and showing where to get services and entertainment. After the acute basic needs are covered, people can afford to think long-term issues."
Italy - VCSC	Among the measures to increase protection for consumers in energy poverty, the VCSC also discussed the idea of a distinction between involuntary and voluntary arrears. In the first case we talk about families that are unable to pay their electricity and gas bills, due to problems related to their disposable income; in the second case, we are talking of individuals who voluntarily choose not to pay - the so called energy tourists. The two types should be treated differently, for example by not applying default interest in the first case.
Italy – MAD	According to their previous experiences, HEAs emphasized that high percentage of vulnerable consumers are adults, especially the elderly - who have difficulties not only with energy issues but to understand the market and their rights. Therefore, a different role of the institutions is needed, not only at the informational level but also in involving the different stakeholders and entities. In particular, while at the local level it may be easier, at national level it is much complex to create initiatives with third sector entities.

Poland – VCSC	The training-networking-action model of ASSIST ensures an holistic vision and is a good model to strengthen social protection of vulnerable consumers. We have diagnosed that a large role in Poland is played by non-governmental organizations that significantly complement the work of municipal social assistance centres. An assistance organization - WRZOS, a member of EAPN, presented the forms of activities and implemented projects. Particularly a lot of time the participants devoted to the question of ways of measuring poverty and social exclusion presented by WRZOS. The members of VCSC discussed the benefits of introducing indicators in the area of energy poverty, which could be used for assessment poverty as an social phenomenon. The discussion followed the need to adopt a measure better reflecting the multidimensionality of poverty. Material deprivation includes the following (4 of 9) factors: - timely payment of fees related to the apartment (rent and maintenance accounts), - adequate heating of the flat, - financing of the unexpected expenditure (in the amount corresponding to the monthly value of the relative poverty threshold adopted in a given country, in the year preceding the survey); - food consisting of meat, fish every other day (or their protein equivalent - vegetarian equivalent); - pay for a weekly break for a vacation once a year, - a car, - a washing machine, - a colour TV set, - a telephone. Polish VCSC have an interesting discussion how we could implemented similar (however suitably adapted) scheme to the Polish benchmarks of energy poverty. The issues of the definition of poverty and social exclusion are complicated also, as in the case of energy poverty. Together, the participants of the meeting determined that the subject of energy poverty should be more strongly emphasized in defining the problem of poverty. Kamila Płowiec, director of WRZOS, stated that: (...) poverty is a state of mind. Counteracting poverty requires many soft actions. The issue of counteracting energy poverty in the work of an assistance organization should also be strengthened. At European annual meetings of people affected by poverty, this topic should also be discussed. A representative of another assistance organization - the Federation of Polish Food Banks presented educational programs implemented by the organization. They concerned, among others, the issue of managing the individual household budget. She expressed her desire to enrich the content with the issue of energy efficiency and energy saving.

Poland – MAD	The biggest need is a legislative approach to these solutions that are competitive and cost-effective, but socially just, for example, protective measures. Interesting for the participants, the topic concerned the cooperation of the Polish Consumer Federation with assistance organizations - WRZOS and the Food Banks Foundation in Poland. The consumer organization in its work contacts vulnerable consumers. Problems with which consumers come are not just legal problems. Many of them are helpless in the face of various forms of abuse. Some of them are seniors living alone. The issues of energy poverty also affect people who come to the organization's branches. That is why the previous training and meetings regarding energy law, aid and protection programs were so important. Also issues of co-financing for thermal modernization. According to the participants, the programs related to the Clean Air Program are insufficiently popularized.
Spain – VCSC	The social bonus is a valuable measure to aid the vulnerable consumer but all the VCSC members agree that it can be improved considerably. Some of the suggestions provided are as follows: • Enhancing and facilitating the application process. • Providing integrated measures that include education and empowerment of vulnerable consumers • Including preventing and not only corrective measures. • Reviewing the assignment criteria in order to efficiently address vulnerable families. • Creating a new social tariff that could be progressive and structured by levels of consumption in a way that it could eventually finance up to 100% of the electricity bills in the most severe cases of vulnerability.
Spain – MAD	The main objection to the Spanish social bonus is the complex administrative process that vulnerable users have to overcome to access it. The lack of information is also an obstacle for the end users who, not always know how to proceed to access the social bonus or even which are the criteria they have to meet to get it. The lack of energy literacy among most end users has also been highlighted by many of the responses gathered. Several proposals on how to improve the protection of vulnerable consumers have been provided by responders. Some of the most interesting ones are listed below: - To apply a reduced VAT to the energy and lower taxes for vulnerable users. - The design of a special tariff with low energy prices for a mean basic consumption level - Apply disconnection protection for vulnerable users - To define and apply identification protocols for early vulnerable risk detection - To enhance the coordination and communication between social

	services and energy companies. - To associate the energy bonuses to training sessions on energy efficiency. Citizen training, sensitization, support and protection in cases of cut-offs are the main aspects highlighted by the participants. A more accurate identification of vulnerable users is essential for the definition of better policies avoiding the stigmatisation and discrimination of people and improving the amount of the social aids addressed to vulnerable users. The participants also suggested the implementation of an integrated card in which all the social benefits of the families are included, in order to simplify the provision of services and facilitate the work of the related public administrations. A social tariff for the electricity was suggested as well, not related to the market price variations and with a stable price reviewed half-yearly, according to the family incomes. The public housing policies need to be developed in an energy efficient way and more budget need to be assigned to the building renovation for the improvement of their energy efficiency.
UK – VCSC	There is support out there but the message isn't getting through to lots of people. The Government could do more. The funding has been given to utility providers (energy suppliers) to decide what they want to do. There should be one known step process for the whole country. Current situation is problematic because; a) Process involves different company canvassers, confusing vulnerable customers. b) There is a free market on fuel poverty action which means companies gain their profit from 'low hanging fruit' i.e. easy measures. Smart meters could help vulnerable consumers get a real picture of their energy use. The Government has started a big PR campaign with Smart Energy GB but many people are wary of sensors and monitoring. Estimated savings with aren't great at £11 a year savings. Smart Energy GB is behind on targets and there are challenges getting into hard to reach homes. New build smart system. Trials of solar panels and battery with monitoring and behaviour change of energy use Social networks – education and understanding. If you get a full home system and have only heated one room fuel bills will go up. Is just keeping energy bills low enough? People need more education
UK - MAD	SB- With improved access to information members would be able to gain access to local authority grants for home and heating improvements, online cheaper tariffs. Community events which give energy advice are not deaf user friendly and more resources for advice organisations such as BSL signers at events would help. IH- Most members have support workers and energy needs are low down on

	their priorities –'one more thing to think about' Energy awareness training of support staff would be ideal but many are private companies who do not want to invest in their staff development (time/money issues) SM- Insight Glos have a generally older demographic and are at risk of paying higher tariffs as they are unlikely to switch suppliers regularly. The switching websites are not VI friendly. Also members are at risk from cold callers. They are unable to see ID and very nervous of visitors generally. There is a need to build up relationships through trusted avenues.

3. How should the mechanisms for socially responsible and inclusive policy-making at national and EU level be improved?

Belgium - VCSC	*Apply poverty test as standard, cf. roll out digital meters (taking into account the outcome of the poverty test).* *Europe is failing to control malpractice for energy suppliers. There are still door-to-door sales. Everyone agrees that there are malpractices, but these are not being curbed. There is a gentleman's agreement with the energy suppliers but this does not work. Door-to-door sales can be abolished at EU level, but this does not happen.* *Policy to combat energy poverty must start from the basic energy / comfort needs (cf. study Family Union).*
Finland: VCSC	This question was considered to be quite large and complex issue to discuss briefly during the meeting. Steering committee work and other events that bring multiple stakeholders from different sectors together was mentioned to be good for cross-sector dialogue, which allows the voices in different industries to be heard by others that work on closely related issues. Strengthening the private and third sector collaboration with the public sector was considered to be a good way for inclusive policy making, since many third sector and customer service organizations work closely with the people outside decision making bodies and can aggregate opinions and draw relevant conclusion based on the served population's feedback. The rapid digitalization of public services will also require the society to ensure good communication network services for all citizens, vulnerable consumer segments included.
Finland MAD	"Webinars would be an effective way to bring cross-sector experts from different regions together. It is suggested that much of the communications, trainings and events would be held as webinars during the ASSIST project to ensure the availability of events to everyone equally." "The participants agreed that making the activities of different organizations familiar to each other helps in building more seamless and better working service

	chains.”
Italy - VCSC	The VCSC has highlighted the need for mechanisms to improve policies, at European and national level, especially in order to achieve a greater inclusion of consumers experiencing energy poverty. The first problem identified by the participants is the absence of a complete analysis, with a broad view of the phenomenon of energy poverty. One of the actions could be to identify a focal point, such as the establishment of the National Observatory on energy poverty envisaged in the Integrated National Energy and Climate Plan.
Italy – MAD	The workshop participants highlighted the difficulty in involving consumers in energy poverty in the decision-making process: the information gap is too big, thus the need for an integrated role as the HEA. In order to improve the process, it would be also really useful to connect the various existing networks on strictly connected topics but which tend not to come into contact. It is important to build on direct experience of intermediaries and for this reason sharing experience is extremely important.
Poland – VCSC	The VCSC members in Poland didn’t discuss on this issue. We have focused on vulnerable consumers situation and practical aspects of improving their energy market participation.
Poland – MAD	Repetition of interviews after a year by HEA may bring interesting conclusions. It can show in practice measurable benefits resulting from the proposed actions and savings. Not necessarily relying on investments. Tools already created during the project - video clips and FS’s - should strengthen the educational effect. As a consumer organization, we should use them to cooperate with energy market entities. These are entities that should be interested in reducing the energy consumption of their clients. Especially those who have problems that result from low incomes and high costs.
UK – VCSC	National policy feed in process is there: Usually send out a consultation document to local authorities but it’s uncertain what the take up is. Also very unclear whether they are listened to. E.g. P.A.Y.S. LA pilot model trailed in Stroud was clearly the best scheme but the Government went with utility companies and commercial rate loans. And subsequently the Green Deal failed to take off. There is now a shift towards carbon reduction rather than fuel poverty. Already on the cards but now with added urgency with many councils declaring a Climate emergency. OFGEM are taking this into account with a significant shift from their role as regulator, to one in which they will be acting to protect consumers during the transition to clean energy.
UK - MAD	Contacting energy suppliers - Deaf and hearing impaired consumers need an alternative method of contact for services including energy companies, so text numbers as well as telephone numbers. Deaf awareness training was suggested for energy advisors / suppliers. Members rely on the GDA website for information with BSL signed and subtitles videos for information of services. What became clear was there were specific communication needs and there was a need for better energy advice resources that could be accessed by individuals. Suggestions were made for BSL/sub-titled videos to be produced covering

energy saving advice that could be posted on the ASSIST UK / GDA website and offered to all national deaf and energy advice organisations. SB- There needs to be more accessible user involvement which should be adequately resourced with funding. E.g. focus groups with BSL interpreters.

Many consumers with learning disabilities are reliant on their support workers for management of their energy bills. As this is often low down on their list of priorities, the consumers have no one checking their energy tariffs or picking up on any heating or heat loss problems. Standard energy advice leaflets and online information are not accessible to this group. Energy advice training for support workers was recommended although these are often employed by private companies and outside of the current partnership network of Severn Wye. For those people who do not personally manage their bills or heating controls, it is still important to get across the idea of energy saving. A lot of the energy saving tips are common sense such as turning down the heating rather than opening windows, switching off lights and electrical appliances. Others who live more independently would also benefit from a simple-to-read leaflet on bill and energy management. IH- Tim Heaven is a member of the Learning Disabilities Partnership Board and regularly contributes to the Community Well-being Strategy. Staff and members also take part in the Big Health Day check an interactive event that aims to improving access to health and well-being support for people with learning disabilities and other disabilities https://www.inclusiongloucestershire.co.uk/big-health-check-day-2019/

Visually Impaired (VI) consumers are often unable to use online services to check bills, change tariffs or suppliers or to research local grants and services. They are particularly vulnerable to cold callers and visitors generally as they cannot check ID cards. Many VI members are generally older with deteriorating sight loss and at a higher likelihood of not switching tariff for many years. At home, they have issues around changing their heating controls and thermostats so don't have the same flexibility as other households. Members use local Talking Newspapers to get information on local events and one to one support from Insight. Professional produced recordings of energy advice were recommended by Steve Martin from Insight to help blind people access the correct information and make sure they are not missing out of local grants and initiatives. The voice recordings could be used by Insight Glos website, local and national Taking Newspapers and other national VI organisations. In addition, Steve emphasised the importance of face to face interactions via trusted organisations. Several suggestions were made on how Severn Wye could develop these links. E.g. energy advice surgeries booked alongside hearing equipment surgeries at Insight Glos. SM- Insight Glos and its members are sometimes contacted by Gloucestershire County Council to consult on VI provision in their development planning but the feeling is they are consulted and then ignored. E.g.- pavement furniture – not giving wide enough space for person and guide dog and textured drop pavements – leading to unsafe areas

4. How should the social dialogue between energy and social actors be improved in order to better reconcile their interests?

Belgium - VCSC	*Now mainly focus on objective energy poverty, debt repayment, default.* *Involve parties involved in increasing minimum income (hidden and subjective energy poverty) in the energy & poverty working group.* *At the federal level, the King Baudouin Foundation brings together many actors through the energy poverty platform.* *The consumer (and not just the vulnerable consumer) and commercial suppliers must also be involved*
Finland: VCSC	The governance culture in Finland was considered to be rather transparent and dialogue-rich already. Since the population of the whole nation is the size of a large European city, the hierarchy or silos between different organizations were not seen restrictive or exclusive. A couple of improvement suggestions were mentioned during the discussions; Extended networking efforts between advisory and field operation staff was considered as an important development step to bring the energy renovation theories and practices closer to each other. Due to the below-average level of trust towards advisory services within the vulnerable consumer population it was considered important to provide harmonic and compatible information for households during each step of the energy advisory and renovation processes. Increased dialogue between the advisory service providers ensure that the suggested actions for different consumer segments are aligned throughout the advisory process. Collaborative events and programmes were considered as a good solution to bring forward networking and dialogue in practice. Various workshops, seminars and discussion panels were considered to be useful approaches for bringing the different industry representatives together to discuss about topics that concern professionals across multiple sectors. The steering committee members also saw added value in multidisciplinary programs that gather various sectors together to achieve common goals. Concrete long-term goals and timelines were considered important when looking for larger cross-sector collaboration in creating solutions.
Finland MAD	Collaborative programmes and events are a great way to make the different sector actors collaborate. It is important to have non-commercial and non-profit facilitators for the discussions to increase trust between the network actors. Transparent active communication by the mediator is also required to upkeep the momentum for low-barrier networking between sector actors.
Italy - VCSC	The dialogue between the different stakeholders linked to the issue of energy poverty is still considered to be not very developed: there are few opportunities to summarize the different positions and sensibilities, and sometimes there is also a lack of interest in finding a common perspective.
Italy – MAD	The market actors stressed the importance of establishing a truly effective network: how to make exchanges of experience easily, how to involve subjects who are currently isolating themselves - for example those in the third sector.
Poland –	We have discussed the condition essential for social dialogue in the context of

VCSC	lack of social tariff in Poland and using tool such as pre-paid meters. We asked the energy sector representative if pre-paid meters are not a solution to the problem for households affected by energy poverty. In response, Tomasz Topola stated that: (...) the pre-paid meter is not a remedy for this problem. To some extent, yes. It forces you to be interested in your electricity consumption. The way to use it. But without responsible planning can cause shortages in power supply. This is especially dangerous for “sensitive vulnerable” consumers. Remote cut off power due to exhaustion of cash can be dangerous to the person using the life-support device. Members of the VCSC focused on implementation of the Clean Air Program, too. Representatives of the Energy Regulatory Office participated in the work of the Working Team. At the meeting of the Steering Committee, they stated that: (...) the income criteria for persons at risk of energy poverty will probably always be taken into account when defining this phenomenon. They are measurable. It should perhaps be a wider look at this issue. It is much more complicated than income issues. The representative of the Fund for Environmental Protection and Water Management presented the major elements of the Clean Air Program in the context of increasing energy efficiency and counteracting energy poverty. The program focuses on thermal modernization and changing of heating sources. These are matters that are very important from the point of view of air quality and health. Necessity of insulation is crucial for most vulnerable consumers in Poland. Of course, education for households is also important at this time. Acting energy advisers of the National Fund for Environmental Protection and Water Management would be able to use HEA assistance in those areas where additional information and education aimed at individual consumers is needed. The proposed solutions in the Clean Air Program must obviously be cost-effective, but above all socially just. The participants of the meeting agreed with this statement.
Poland – MAD	There is also a need for stronger cooperation between the NGO and the local government. They could often become a bridge between different types of institutions.
Spain – VCSC	Some of the steering committee members consider also important to address the EP problem from the private and public sector and not only from the energy and social perspectives. Some of the proposals to address the EP from different perspectives can be summarised as follows: • Better and deeper coordination among the different stakeholders (energy companies, social services, public entities, etc.) • Cross-training and integrated training for all the stakeholders involved • Crossed coordination for the definition of measures and actions.
Spain – MAD	Both the energy and social perspectives have to converge together towards a joint solution for the better assistance to the vulnerable users and for a smooth and efficient energy transition. The most common suggestion gathered among the respondents to enhance this situation is to create specific forums where the main stakeholders from both

	sectors can sit together and share their perspectives for common solutions. The creation of specific multidisciplinary working groups is seen as a necessary step to propose meaningful policies that tackle the causes of the problem instead of being merely patches to the energy poverty problem. A plural dialogue must be fostered to approach energy poverty. A wider perspective is needed and different administrations need to coordinate better among them. For this to happen, affected families should be more and better informed and trained about the practical, economical, technical and social aspects of energy use, to become effective actors and to better exercise and demand their rights. A general restructuration of the current energy system is needed to generate an effective social change. With a more intense implication of Social Services in the logistics of the cut-off notification to customers, municipalities could identify people in deep vulnerability to offer them better attention. This approach requires budget and human resources allocation for local administrations and could improve the communication between companies, public actors and citizens. Public sectorial tables to coordinate the design and development of social benefits could foster the participation of citizens. The improvement of energy storage technology could help renewable energy companies to leverage their energy surplus, which could be of benefit for vulnerable families.
UK – VCSC	Energy company to consumer communication not specific enough to the needs of most vulnerable members. There is an increasing reliance on communication with energy suppliers via the internet. Where companies do use phone lines there can be extremely long (and often expensive) waits on the phone to be connected. Also, not all consumers can talk over the phone. Energy companies don't do home visits. HEA's and W&W energy advisors do make home visits but will always miss some people. There is a good charitable organisation network in the UK and the voluntary sector are well linked in to make referrals to each other, but the Energy companies do not necessarily do this. Some companies offer more help than others, transparency WHD a prime example. There is often problems with vulnerable consumers having difficulty switching tariffs when their contract is up. New ways to pay for energy may be coming forward to address this, including changing the billing format. Vulnerable consumers more likely to stick with traditional company (e.g. British Gas) and be stuck in cycle of bills going up and stuck on peak tariff.
UK - MAD	SB- Alternative means of contact e.g. energy suppliers providing text numbers as well as phone numbers or offering face to face service and Deaf awareness training for suppliers. IH- Members need a trusted advocate to act on their behalf on tariff switching, checking their bills and picking up on heating problems or levels of insulation. Training of Inclusion Hub staff and personal support workers would help this process and raising the awareness of Warm & Well home visits service for more complex energy issues.

	SM- Face to face with a trusted organisation /person who knows what their tariff is and can switch for them. There is a role for Severn Wye for Energy Advocate or CCP worker to attend their Outreach offices equipment days with booked appointments to look at bills and switch on the spot.

6. How should the citizens' involvement and their capacity to participate effectively in the decision-making process concerning vulnerable consumers and energy poverty be strengthened?

	Involvement of vulnerable customers in the decision-making process has already evolved considerably. The target group is questioned, there is consultation with the target group. *Now there is an exchange of information via the Energy & Poverty Working Group and stakeholder consultation.* *Structural involvement of the target group and experiential experts (e.g. Community Development) in the decision-making process via, for example, an energy poverty test.* *A balance must be found between input from vulnerable consumers (personal experiences) and professionals (helicopter view).* *There is a need for experiential experts within the government.*
Belgium - VCSC	*There are already experiential experts within the government (both at the Flemish and at the Federal level), but there can be more and their position can be strengthened.* *Poverty tests already exist in Flanders. This is an instrument in which experiential knowledge and scientific knowledge are crossed to shape new policy. It would not be a good idea to argue for separate energy poverty tests. Energy poverty is included in the poverty tests. The poverty tests are an enormous added value and quite unique in Europe. This instrument must be strengthened and deployed even better.* *In addition to the poverty tests, there are also consultations between people in poverty, cabinets and administration. The intention is for people in poverty to point out bottlenecks and obstacles based on their experience. It is also the intention that they transcend their own experience and use the helicopter perspective. These processes also need to be further strengthened. Social professionals can provide their input through other avenues. It is the task of social professionals to provide people in poverty with this helicopter perspective when preparing consultations or poverty tests*
Finland:	This was considered as a large question to be solves in societies in general across all sectors. The energy advisory network can record what kind of issues

VCSC	the customers are raising to formulate an understanding about what are the most pressing and topical issues among households. ASSIST project is successfully bringing stakeholders from different sectors to identify and discuss the sources and effects of energy poverty. The dialogue helps the different organizations to take each other's point of view into consideration when formulating action plans and advises for policy makers.
Finland MAD	"Better communication about the root causes that may lead to energy poverty to assist vulnerable consumers to identify their situation. Utilizing social media data to identify commonly shared issues that are considered as topical problems. "
Italy - VCSC	The VCSC emphasized the need to create a network not only of citizens but more importantly a network of institutions and stakeholders that are committed in fighting energy poverty. The risk in involving only individuals is to create an ineffective network and thus disrupting the ability to participate in decision-making processes. Intermediaries, as the HEAs network could be, therefore remain fundamental for greater decision-making involvement of vulnerable consumers.
Italy – MAD	HEAs have proposed the idea of nationwide listening desks – in order to break the mistrust and discomfort linked to the vulnerable condition. They would not double existing help desks, but just create a focal point to understand their issue and raising them into the decision making process.
Poland – VCSC	The VCSC members in Poland didn't discuss on this issue. We have focused on vulnerable consumers situation and practical aspects of improving their energy market participation.
Poland – MAD	Participants of the 2nd MAD concluded that we are all consumers, we have a right to be correctly informed about market. In that reason the best solution is to empower the consumer education which would help to avoid unfair market offers which often are targeted to vulnerable consumers in Poland. It would be the significant step on the way to understand a role as a consumer on local market and in such specific market as an energy one in Poland. Tariffs approved by regulatory office cased that consumers are not interested in group switching and moreover they do not understand for what their pay for. This is unfortunately easy way to be affected by unfair companies operated in Poland and sign unfair contract.
Spain – VCSC	The National Energy Poverty Strategy has been approved a few days ago in Spain. Do you think citizen participation is sufficiently considered in the decision process? How do you think it could be improved? The VCSC members agree that the citizen participation has been sufficient to approve the National Energy Poverty Strategy in Spain but also agree that this could have been improved in the following ways: • Provide more extensive deadlines and more diverse channels for participation. • Create and maintain stable participation and consultation forums such as working groups or monitoring and control commissions. • Make the problem visible through communication campaigns.

	• Consult and promote those citizen platforms and social entities that have been working on the Energy Poverty issues for a long term.
Spain – MAD	More transparency is needed in all the stages of the process. This could be reached through good communication strategies and updated context and detailed information about the whole energy generation, distribution and supply system. Proper citizen training about the concepts related to energy saving is key to their engagement and direct participation of vulnerable people is essential. Public consultations like the one performed for the Spanish Public Strategy on Energy Poverty, a permanent social energy council with access for citizens or the creation of a network of volunteers to address vulnerable audiences were putted as an example of good practices, though in some cases not enough to reach all involved actors. At the local level, more participative tables were suggested. Clear energy information and training for all the end users is a must to enhance citizen participation in the decision process. It's not possible to provide suggestions if you don't have the correct information first. Improve the transparency of such processes is also important, promoting and publicizing the participation protocols and allowing all the main energy stakeholders, public bodies, social entities and non-profit associations to present their suggestions and proposals. Direct consultation to the social entities already working in EP issues and inviting them to participate in the process from scratch would also be a solution for the respondents.
UK – VCSC	Tenants and residents voice is not really there in the system. But is there any appetite for this? Often the only communication to housing providers and local councils is to complain about things they don't like. Tenants Associations aren't as strong as they used to be. For South Gloucestershire Council housing team the difficulty is that they deal mainly with private sector rentals. There is no umbrella of support for them unless they move into a local authority home. But it was felt that Vulnerable Consumers don't have the capacity to affect national decisions regardless. For many people, to seek rights on or be heard on fuel poverty is not the number one concern for them. Fuel poverty is just part of their trial and everyday life. It would be hard to attract people to a Fuel poverty forum but maybe as a wider discussion with debt and poverty. It was thought that as a generalisation, British people don't protest against it just grumble.
UK - MAD	SB- It is challenging for the deaf community to take part in voluntary activities. Work funding packages do provide BSL interpreters when needed for employees. However there is no funding for interpreters for volunteer roles. SM- The members do take part in focus groups sessions for the County Libraries Services and for the NHS (Cheltenham Hospital) on ways to improve their access to their services. There is an opportunity for Severn Wye to carry out interviews with computer club members in September.

7. Are you aware of the National Energy and Climate Plans (NECPs) submitted by your government under the Governance directive? What is your view on what is mentioned in the report on energy poverty? Is there something missing?

Belgium - VCSC	*On the positive side, NECP deals with social protection, social tariffs and energy efficiency.* *There is a need to quantify objectives in order to subsequently be able to monitor and adjust policy measures if necessary.* *It is important that sufficient resources (personnel, financial) are provided in proportion to the problem. After all, there is great potential with this target group for achieving the energy and climate objectives, namely 15% - 20% of families or 300,000 - 600,000 homes.*
Finland: VCSC	All the energy related actors and some of the social sector actors were aware that the National Energy and Climate Plans were in the drafting phase, but the timetable for the process and the utilization of the report were not clear to all participants. The discussion was first about the use and purpose of the report and the publishing timeline. The Finnish NECP draft was discussed in lengths, going through the report and especially the sections that dealt with energy poverty related issues. Most of the feedback had to do with clarifying the content by harmonizing the terms used with the content of other energy and social sector related reports. Suggestions also included references to the exact laws discussed in the report. The current version of NECP states in the section “Energy poverty”: “In Finland there is not a significant number of households, which would suffer from energy poverty. This is why Finland does not have national objectives related to energy poverty that is mentioned in the Article 3.3 (d) of the Governance regulation. In Finland, energy poverty is in the current practice discussed as part of general social policy, which secures the right of all citizens especially to basic necessities such as energy.” Ministry of Employment, in the NECP draft report. Participants working on the advisory issues suggested that the recent developments in the energy related advisory services could be specified in the last paragraph that describes the activities around alleviating energy poverty. Some of the steering committee members wished that the energy poverty in Finland would be further defined in multidisciplinary collaboration, but it did not become clear who would be the best responsible parties to conduct or lead the official definition process.
Italy - VCSC	In the Italian National Energy and Climate Plan the subject of energy poverty is treated in a specific chapter. Actions are envisaged for the near future to help tackling energy poverty, such as the revision of the social bonus to make it automatic, in order to make it available to all potential consumers within the thresholds. In the same way, the Plan envisages the establishment of an Observatory on energy poverty, able to act as a connection centre for the several stakeholders interested in tackling energy poverty, operating in the different sectors and areas.

UK – VCSC	Some members of the steering committee were not aware of the NECP, however others believed that policies in some regions were stronger than others. As it is a devolved matter in the UK, England, Scotland, Northern Ireland and Wales have the power to set their own policies and legislation. It was felt by the majority of the VCSC that Scotland had by far the strongest policy when it came to energy poverty. This is also evidenced through the amount of funding allocated to the alleviation of fuel poverty in Scotland over the last ten to fifteen years. In England, where the VCSC members operate, it was felt that the policy could have been more explicit in terms of fuel poverty reduction, rather than simply outlining targets to reduce poorly insulated and energy inefficient properties. The NECP includes information on energy poverty (or fuel poverty as it is known in the UK) within the section on the internal energy market. This is certainly a well-established modus operandi of the UK government, using tools such as the Energy Company Obligation (ECO) to leverage in funding to help consumers in fuel poverty. Steering Committee members felt that in their experience this is a system that works well. National and local government do not have the funding to be able to make changes to properties and so the energy company obligation has been necessary and the results have been positive overall. On occasion it was felt that the administration of the ECO scheme could be simplified, but at the same time it was important that the rules for funding were updated to reflect the current priorities.

Annex 4. EU Vulnerable Consumers Steering Committee meetings – policy recommendations:

1. EU first Vulnerable Consumers Steering Committee's meeting

Generic recommendations and remarks:	• *Participants stressed the importance of having a clear and comprehensive framework on energy poverty at the European level, based on a common definition and clearly presenting the structural causes of energy poverty and the appropriate measures tackling those causes and the different levels of decision making involved.* • *Differences between the local-level/behavioural changes and the structural changes for prosumers should be noted.* • *The training of Home Energy Advisors (HEAs) stimulated an interesting discussion about the goals, content and impact of the training. Since much of the debate on energy poverty, at least at the European level, revolves around energy efficiency, to what extent would it be possible to train the HEAs on what are the options available for becoming an energy producer, becoming a prosumer – it would be more forward-looking and more empowering for the people receiving the training and for those with whom they will work in the future.*
Energy poverty policy-making:	• The example of the Right to Energy Coalition[40] that brings together social and environmental NGOs having as main goal developing a common narrative on energy poverty. It was reminded that action on energy poverty policy can only reconcile social and environmental issues. • Further efforts need to be made to integrate energy efficiency and renewability in the energy poverty debate. • There was a strong recommendation to start the discussion and reflection on policy recommendations from the Clean Energy Package and the opportunities it brings and the long term 2050 Climate Strategy. • Pierre-Jean Coulon, Head of the TEN Section, EESC said: "*We have the Energy Poverty Observatory, which is a platform collecting data but we need to do more than that, we need to share all the information and knowledge produced on energy poverty with different kinds of stakeholders. Having an observatory on energy poverty is an important step but it is not enough, the EPOV is useful in understanding the problem but we need to solve the problem. In order to solve the problem, we have to share the problem with all the stakeholders.*" • Encouragement to engage with the European elections process

[40] https://righttoenergy.org

	to ask politicians to make strong commitments to tackle energy poverty; • Opportunities that the Clean Energy Package presents for taking action and developing measures to alleviate energy poverty in Europe. • Some of the members of the EU VCSC urged for focus on the revised Energy Performance of Buildings Directive (EPBD). Under this directive, EU countries will have to establish stronger long-term renovation strategies, aiming at de-carbonizing the national building stocks by 2050, and with a solid financial component. • The European Parliament has been the champion in leading the debate on energy poverty, especial on the Electricity Market Design because they have been calling for a unified criterion, for reporting and monitoring of energy poverty for national action plans in member states. However during the meetings the debate took a completely different course as the only measures against energy poverty proposed by Member States are regulated prices and they are using energy poverty to defend regulated prices. The European Parliament pushes for more forward-looking measures and argues that Member States should invest in renewable and community energy and should put in place national action plans and monitoring mechanisms. The debate on regulated prices is very much polarized and it is difficult to find a common position even among members of the Right 2E Coalition where there is a division between social NGOs who support regulated prices and environmental NGOs who fear that regulated prices serve as hidden subsidies for “dirty” energy. • It is important to look at the mechanisms enshrined in legislation but also important to be aware of other levels of decision making and existing mechanisms like for example the local and regional level. For example, energy poverty is a debate quite often featured during discussions at the Covenant of Mayors and other similar spaces;
Energy poverty, renovation and energy efficiency	• The national renovation strategies should be developed in a participative manner with the involvement of different stakeholders and will contain different measures tackling energy poverty. Therefore, project partners and members of the National VCSCs are strongly encouraged to inquire about these processes at the national level and take the space or claim a space to participate in them. The more diversity in the stakeholder’s group, the better. By 2020 all Member States should submit national renovation strategies; renovation of old buildings is the main challenge that Europe has. 97% of buildings are not in the A category, which means that a high

number of Europeans leave in cold and dump houses.

- We need to establish a strong connection with the legislative framework on renewable energy and the importance of de-carbonization. We are looking at CO2 in general and not only to energy savings but more globally at decarburization, which also means the production of renewable energy;
- Another important opportunity or dimension that we need to be aware of is the new Energy Efficiency Directive that clearly stipulates in article 7 that when designing obligations to achieve energy savings goals, Member States '*shall'* take into account (before it was "*may*" take into account) energy poverty and in particular focusing on vulnerable consumers and social housing[41]. This opens the possibility for member states to develop schemes like the ones already existing in France – The White Certificates Scheme – that might be useful for financing renovation and renovation of social housing or financing renovation with a view to alleviate energy poverty.
- The concept of self-consumption as presented in Article 21 of the Renewable Energy Directive[42] as "*'renewables self-consumer' means a final customer operating within its premises located within confined boundaries or, where permitted by a Member State, within other premises, who generates renewable electricity for its own consumption, and who may store or sell self-generated renewable electricity, provided that, for a non-household renewables self-consumer, those activities do not constitute its primary commercial or professional activity" (Art. 2)*. Self-consumption can be an interesting way to reduce energy bills. There is an example from France where a social housing provider has installed PV[43] for self-consumption in

[41] Directive (EU) 2018/2002 of the European Parliament and of the Council of 11 December 2018 amending Directive 2012/27/EU on energy efficiency:

Article 7 §11. *In designing policy measures to fulfil their obligations to achieve energy savings, Member States shall take into account the need to alleviate energy poverty in accordance with criteria established by them, taking into consideration their available practices in the field, by requiring, to the extent appropriate, a share of energy efficiency measures under their national energy efficiency obligation schemes, alternative policy measures, or programmes or measures financed under an Energy Efficiency National Fund, to be implemented as a priority among vulnerable households, including those affected by energy poverty and, where appropriate, in social housing.*

*Member States shall include information about the outcome of measures to alleviate energy poverty in the context of this Directive in the integrated national energy and climate progress reports in accordance with Regulation (EU) 2018/1999 [*Governance of the Energy Union*].*

[42] Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources

[43] Photovoltaic self-consumption is the consumption of PV energy which takes place directly at source or in the immediate vicinity – either immediately or delayed with corresponding intermediate storage. (SMA.de Commercial self-consumption

order to reduce the energy bills of tenants with approximately 70 euros per year (example provided by Housing Europe). For the social housing sector it means that combining this with energy efficiency measures, you can reduce energy bills with 300-400 euros per year, per tenant.

- Market Design regulation, complementary to the article 21 mentioned previously, states the ability of individuals to sell their electricity to the grid without extra costs, meaning without having to look for a market player or an aggregator. The obligated buyer could be a public enterprise – a model which most often works. The Market Design Rules should enforce this in order not to burden individuals, including tenants or it may well be social housing providers when they sell their energy to the grid.
- Need to balance long term measures such as energy efficiency and renewable, community energy that are at the same time structural responses to energy poverty with short term measures that provide immediate solutions and support to people and households facing energy poverty. In Europe, seven million Europeans receive disconnection notices every year and if energy is a right, and it has been proclaimed as such in the new European Pillar of Social Rights then it must be enforced. New mechanisms for action should be enshrined in the new EU legislation, currently the text says Member states may prohibit disconnections at critical times but when you are living in energy poverty you are always in a critical time. With the ongoing transformations brought by climate change, we will increasingly be faced with the problem of heat waves. Until now there has been a lot of focus on the winter energy poverty but we will increasingly see severe heat waves across Europe during summer and urbanization in this context is a real challenge because cities are the worst places to be during cities and most Europeans are living in cities.
- Special attention needs to be paid to negotiations on the Multi Annual Financial Framework (MFF) - BPIE carried out research in South-East European Region on how the money available for energy efficiency in the current MFF was spent, and the conclusion was that only 3% of the money was spent on energy efficiency measures and 97% was used for energy infrastructure. Thus, in the current negotiations process it is very important to pay attention to that and push for a specific percentage of the budget to be allocated to energy efficiency; currently the proposal is that 30% of the budget should be

of solar power - Information for plant designers https://www.sma.de/en/partners/knowledgebase/commercial-self-consumption-of-solar-power.html, accessed on 5 June 2020)

spent on climate action.

2. EU Second Vulnerable Consumers Steering Committee meeting

This meeting gathered representatives from European institutions and bodies (Silvia Vivarelli – European Commission; Jeroen Vandeur – Committee of the Regions; Janine Borg and Kristian Krieger – European Economic and Social Committee), Social/NGOs (Guillaume Durivaux – EPSU; Julien Dijol - Housing Europe; Giustino Piccolo - Climate Alliance; Magda Tancau - EAPN); and experts (Marilyn Smith – EnAct). The debate was animated by Marina Varvesi (ASSIST)

Do current policies address adequately energy poverty causes?	**Guillaume Durivaux (EPSU):** *There is something to mention about energy prices - one of the major causes of energy poverty is energy price. One of the measures to fight energy poverty would be to give/provide financial support to low income household. We also need to look at the root causes – why are E prices so high in EU today. The Framework Paper mentions that part of this is because of taxes.* *EPSU perspective – since we start liberalising, creating an internal market in the energy sector – prices have increased. The logic behind the liberalisation process that started 20 years ago should be discussed. The logic should be questioned. Is liberalisation the most efficient policy framework and regulatory framework to ensure affordable and accessible energy for EU inhabitants?* *Regarding the barriers – Lack of knowledge – A barrier is the lack of access to knowledge. European Commission answer is give the consumer the right to access a different supplier. Consumers are lost in the market and is not so easy to switch. As a consequence, consumers don't switch suppliers. They don't know how to do it.* **Silvia Vivarelli (European Commission):** *is there a significant difference in price in between different suppliers? In another European event, it was said that because of taxes, the difference in price from different suppliers is very low.* **Guillaume Durivaux (EPSU):** *This is the logic of the European Commission.* **Marina Varvesi (ASSIST project):** *Example in Italy with an experimentation – the price comparison between different energy suppliers shows a 50% gap difference.* **Julien Dijol (Housing Europe):** *the pure consumer*

approach is limited and flawed. Good news that with the clean energy package – in the governance directive – awareness is raising at the national level that MS have to have objectives and actions. New concept and approach. Will this be enough to fight energy poverty, especially because there is no control of the prices? Buildings' energy sector – the social housing the level of energy performance is better than in the rest of the sector.
Even so, you may have more energy poor because of the level of prices and purchasing power. We have had the same discussion for 15 years. We have made some progress at the level of MS to identify and understand the problem. The HEA could be interesting for MS to develop a bottom up approach because there is no other way to do it.

Silvia Vivarelli (European Commission): *Other projects emphasises the opposite.*

Giustino Piccolo (Climate Alliance): *energy cost is an important element but we also need to look at the buildings stock. No financial support to renovate the poor quality houses. Need to improve the energy performance of these buildings. The mobility – access to sustainable mobility. All policies need to take into account a reduction of emissions. Mobility poverty – Italy – social housing areas are built outside job opportunities. People need a car. It is a very complex thing and good to name different parts of the policy mix. But the price is one important factor. Good proposals to only pay through the bill the energy we consume.*

Guillaume Durivaux (EPSU): *Something that isn't mentioned is the ban of disconnections – we could improve the EU regulatory framework – internal market design directive – some provisions – before disconnecting somebody. We can strengthen in the future the European provisions. That is the first element that we try to work on together with the Right to Energy Coalition – first policy measure: ban of disconnections. Recognize access to energy as a fundamental right and the direct consequence could be to ban disconnection. Concrete measure – ban disconnections.*

Marina Varvesi (ASSIST project): *how do you see the banning? Access to unlimited energy or access to a minimum energy to be calculated per person? Big discussion here on what is right to energy and what is extra? What is your opinion?*

Guillaume Durivaux (EPSU): *We do not define it. For instance, EPSU had the same discussion on water. Water has been defined by the UN. You do not have to define how*

	many kilowatts you need. You just need to recognise that it is a right and we need to ensure that this right is implemented. **Marina Varvesi (ASSIST project):** *The MS should define a minimum level?* **Guillaume Durivaux (EPSU):** *It is not easy. We need to make sure that people are not disconnected.* **Julien Dijol (Housing Europe):** *the prohibition of electricity disconnection of VCs at critical times.* **Guillaume Durivaux (EPSU):** *difficult measure – it is said that more people are affected by energy poverty in summer time rather than winter. I am pretty sure it is the opposite. In any case, when living in poverty it is always a critical time. MS should have their own definition. In many countries – the right to water is now granted. France – law was adopted that protects access to water. Use the example of water in France.*
Is there consistency between different policies: ecological policy, energy policy and anti-energy poverty policy? *Could these policies be better combined to avoid conflicting results?* *How are the interactions between legislations - policies at EU and national level? Do they match?* *If at EU level it is not defined, can it be defined at national level? Perhaps there is need of a common reference system. Which one should be responsibility of which level?*	***Julien Dijol (Housing Europe):*** guidance note on the directive and the EC will propose a definition. A soft approach. ***Guillaume Durivaux (EPSU):*** now MS have to define MS according to three criteria: low income, energy expenditure, low energy efficiency. These are the three criteria that MS have to include in the definition. The EC needs to write a guidance document to explain what the three means. It is framing how MS should define them. ***Jeroen Vandeur (CoR)***: An interesting period is coming with the National Energy and Climate Plans (NECPs) due by the end of the month –MS have to assess energy poverty - the number of households in energy poverty. Interesting to see how the EC will respond to National Energy and Climate Plans (NECPs). Only one country has objectives to fight energy poverty.
How could we strengthen the social protection of vulnerable consumers in order to cope with energy poverty? Let's make some proposals.	***Guillaume Durivaux (EPSU)***: EPSU advocating for stopping the phasing out of regulated prices. New electricity market directive stipulates the phasing out regulated prices – EPSU lobbied against that because it is important to protect consumers with this measure. We need price regulation. In one policy measure – controversial measure to fight energy poverty but at least we know that a free market is not able to protect consumers, users and citizens. ***Julien Dijol (Housing Europe):*** to answer your question about Social Protection, we go on to the question of tax, economic and price and this is the whole problem of energy

poverty. To tackle energy poverty we need to talk about the other things. It is a circular discussion. In the general framework and in the governance there has been some progress. Not enough agreement (no consensus) even among researchers. Same for taxation issue. A lot of different views but one thing is very clear: a lot of this is grounded in economics, very little about social.

Janine Borg (EESC): taxing resources instead of consumption, we need to make that shift. A complete shift. Encourage the use of renewables – from the circular perspective it is very important to focus more to encourage the consumption and use of renewables. Economics measures – shifting the tax from consumption to the resources to influence the choice of producers on what kind of source they use. This has a direct impact on consumers.

Giustino Piccolo (Climate Alliance): you would also punish the ones who use new cars but who drive too much – use the car too much. Complex mechanisms – looking at the national level – where is social housing located... Very complex piece of legislation. The kind of new direction we should take.

Janine Borg (EESC): Report from the Jacques Delors Institute to share – making the European Energy transition socially sustainable[44]. Proposals from the report – improve the housing stock.

One thing missing from this report – there should not be European families cold in the winter. And in the summer? Energy poverty experienced in summer in link to the climate change.

How can we improve the mechanism for socially responsible and inclusive policy initiatives at national and EU levels? How can we improve the social dialogue between energy and social actors in order to better reconcile their interests?

Giustino Piccolo (Climate Alliance): work through the Covenant of Mayors – started with mitigation to climate change we finally added energy poverty. Very complicated framework – energy expert + planning expert + social expert. The most successful way is to have integrated actors – some of this people are also in charge of finances and budget. It is very difficult when you have too big cities or too small ones. Do not know at the national level how this could work – different ministries. Maybe this requires new actors. It is not easy.
Successful case: when cities try to tackle energy poverty on the local level and they succeed, it is mostly through social actors that are already active on the territory – providing the

[44] Fernandes, S. and Pellerin-Carlin T. (2019) Rendre La Transition Énergétique Européenne Soutenable Sur Le Plan Social https://institutdelors.eu/publications/making-the-european-energy-transition-socially-sustainable/?lang=en

framework for them to act – providing room for meetings, budget for printing budget – small activities which were further developed and lead by social actors.

Silvia Vivarelli (European Commission): in other projects energy points were created and set in place (example of Barcelona), upon completion of the projects, the energy advice points have become permanent structures as part of the local administration. Not just an energy info point but also people who have social competencies so they are able to address all kind of consumers - can work with energy poor. How do you see this?

Giustino Piccolo (Climate Alliance): It could work. Barcelona has a structure. The best option is to work with social workers and train them on energy and not the other way around. Energy people are very technical and have limited interest and knowledge in the topic. Local Authorities – bad social housing policies – some of the Local Authorities are responsible for having created energy poverty. Germany – CARITAS working with energy poverty. Sharing with people different tips on how they could avoid energy waste. Social workers know the best how to work with poor consumers.

Marilyn Smith (EnAct): there was a fire in an apartment in Barcelona – fire fighter – uptake in the number of fires related to heating. Every time a firefighter is checking a house also runs an energy check as well. Over 1 year, they identified 800 places that the social department did not know about. Very interesting example, it affects us directly. Another point, in Ireland, there is a programme where physicians/family doctors have the possibility to prescribe a retrofit for people with conditions. The department of Energy is paying for it but they work close with the health department.

Guillaume Durivaux (EPSU): we also organise firefighters – energy poverty might be interesting for them.

Kristian Krieger (EESC): are we not overloading social workers with these tasks?

Marilyn Smith (EnAct): if there is already a lack of trust in different services, everybody trusts firefighters.

Giustino Piccolo (Climate Alliance): capacity for people who do the job, this should be recognised work and remunerated accordingly. People should be trained for this, should be part of their portfolio and be paid.

Marina Varvesi (ASSIST project): Would like to add that when engaging social actors they complain that they have

	too much to do and don't have enough time as energy poverty is not their priority ***Janine Borg (EESC)***: a lot is going already. The question seems to be how to get people to know about it and not only good practices but the bad practices as well and lessons learned. A wider capture. Using online tools. Linked in networks, twitter,... *Marina emphasised that there is a lot indeed going on and difficult to build on the different experiences and make them known.* ***Janine Borg (EESC)***: website with good practices to send it for the report (Circulareconomy.europa.eu/platform**)**. With all contacts from all initiatives around Europe. It is not reinventing the wheel. ***Marina Varvesi (ASSIST project)***: language is a challenge. If local initiative. ***Janine Borg (EESC)***: There is automatic translation thanks to a plugin. there are different options, less expensive. Everything comes from the ground. Contribution from outside the EESC. The idea is not create new content but bring it together as a network. Use social media. ***Giustino Piccolo (Climate Alliance):*** what about the observatory? It should already do that? Maybe this should be included in the recommendations that EPOV can bring together this kind of info. ***Marina Varvesi (ASSIST project):*** EPOV (European observatory on energy poverty) is more on the institutions. ASHOKA initiatives, they are very local and now they try to work more on their dissemination.
How can we strengthen the citizens involvement (and vulnerable citizens) and their capacity to participate effectively in the decision making process concerning vulnerable consumers and energy poverty?	***Kristian Krieger (EESC):*** European energy dialogue – the resources required for vulnerable consumers participation are very high. Vulnerable consumers don't have time. ***Magda Tancau (EAPN):*** Contradicts Kristian saying that vulnerable consumers do have time. The problem is a matter of how we engage with them, how we support them. There are way to work with them. ***Janine Borg (EESC):*** Current president mandate very much focused on SDGs. We have experiences of doing different types of events. The EESC would be a good place to start to answer the question of language. As long as they speak a language that can be understood. Bringing people together to start. Very practical, very pragmatic. We also produce opinions and different types of opinions. The social actors start the conversation.

Good example Energy Poverty Alliance in Barcelona – the forum provides the space and people who have experienced energy poverty.

Marina Varvesi (ASSIST project): challenge from the ground – how do I reach the vulnerable consumers? Social actor – organise an energy cafe. You go to places that are accessible to people. Examples for cooperation from the project.

Guillaume Durivaux (EPSU): how to strengthen cooperation - we should also try to rethink how we produce and distribute energy. In EPSU we advocate for re-municipalisation and take back in public hands energy production and distribution. What forms? Cooperatives, locally owned. Not only look at this from the perspective of big utility producers. Look at the entire chain of production, distribution....

Marina Varvesi (ASSIST project): not all cooperatives involve vulnerable consumers. There are very often entrance fee to be part of a cooperative.

Guillaume Durivaux (EPSU): municipally owned and public owned

Silvia Vivarelli (European Commission): MPOWER project – network of municipalities who are municipalising energy services. More difficult for people to participate in social cooperatives. RESCOOP are promoting social cooperative models.

Jeroen Vandeur (CoR): what has been mentioned by the reps of the EESC is of concern for the CoR – we have a lot of initiatives that are not being disseminated towards the people that need to use them. They do not lead to a more inclusive Europe spanning. Lot of isolated initiatives. This is a point that could raise more energy to focus on. That can be through institutions or other networks.

Annex 5. Participants in meetings, contributing to the Framework paper – VCSC members

Belgium

Coordinators: Erika' Meynaerts - VITO; Annick Baert - Fluvius

An Coninx – Joachim Ceulemans, KOMOSIE/Herwin
Kathy Jansen, STEBO
Shirley Ovaere, VVSG
Thomas Neefs - Jan Maris, Samenlevingsopbouw
Kristine Landuyt, OCMW Antwerpen
Franky Thienpont, Netwerk tegen Armoede
Bart Delbeke, Universiteit Antwerpen
Jill Coenen, Univeristeit Antwerpen
Hanne Stevens, Netwerk tegen Armoede
Yves Pepermans - Annemie Bollen, SERV
Roel Vermeiren, VEA
Veronique Vandeloo, Samenlevingsopbouw
Bert De Wel – Thomas Vael, ACV
Christel Herman, OCMW Gent

Finland

Coordinators: Sini Numminen (since 8/2019), formerly Olli Soppela and Anna Sahiluoma - VaasaETT

Disclaimer: VCSC members having contributed (no all of them active during the whole period):
Riina Heinimäki, Finnish Energy (Energiateollisuus)
Pekka Salomaa, Finnish Energy (Energiateollisuus)
Johanna Kirkinen, Energy Authority
Pia Outinen,Energy Authority
Jukka Laakso, The Finnish Association for the Welfare of Older People (VTKL)
Irmeli Mikkonen, Motiva
Päivi Laitila, Motiva
Timo Ritonummi, Ministry of Economic Affairs and Employment
Pia Outinen, Ministry of Economic Affairs and Employment
Tiina Saarela, European Anti-Poverty Network (EAPN) Finland
Anna Järvinen, Finnish Federation for Social Affairs and Health (Soste ry)
Jussi Ahokas, Finnish Federation for Social Affairs and Health (Soste ry)
Ritva Liukonen, Ministry of Social Affairs and Health
Juha-Pekka, Maijala Ministry of the Environment
Eero Otronen, Lämmitysenergia Yhdistys
Kaija Savolainen, Home Owners Association (Omakotiliitto)
Marianne Jauhola, The Housing Finance and Development Centre of Finland (ARA)
Paula Pessi, The Consumers' Union of Finland (Kuluttajaliitto)
Anne Viita, Finnish Tenants (Vuokralaiset ry)
Petri Pylsy, The Finnish Real Estate Federation (Kiinteistöliitto)

Italy

Coordinators: Marina Varvesi - AISFOR; Simone Maggiore - RSE SPA; Emiliano Battazzi - AU

Laura Colombo, Silvia Pedrotti - Banco dell'Energia (A2A)

Ivan Faiella, Banca d'Italia
Nicola Perrone, Nicoletta Teodosi - CILAP (European Anti - Poverty Network)
Mario Accoto - Comune di Andrano
Pasquale Capezzuto - Comune di Bari
Enzo Bertolotti - Comune di Parma
Anna M. Salama - ENEA;
Francesco Santangelo, Serena Contu, Valentina Garruto - ENI gas e luce;
Serena Rugiero - Fondazione Giuseppe Di Vittorio – FdV
Alessandro Pellini, Luca Benedetti - Gestore dei Servizi Energetici
Marcello Capra - Ministero dello Sviluppo Economico
Marco Vignola - Unione Nazionale Consumatori (UNC)
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WRZOS - Wspólnota Robocza Związków Organizacji Socjalnych
Narodowa Agencja Poszanowania Energii
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Instutut Badań Strukturalnych
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Jeroen Vandeur, Committee of the Regions
Frederic van Agtmaal, EENE

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