



Department
of Energy &
Climate Change

Fuel Poverty: changing the framework for measurement Government response

July 2013

Department of Energy and Climate Change 3 Whitehall Place London SW1A 2AW
Telephone: 0300 068 4000 Website: www.decc.gov.uk

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For further information on this document, contact: Fuel Poverty Team, Department of Energy and Climate Change, Floor 2C, 3 Whitehall Place, London SW1A 2AW

Email: fuelpovertyconsultation@decc.gsi.gov.uk

This document can be found on the Government's website:

<https://www.gov.uk/government/consultations/fuel-poverty-changing-the-framework-for-measurement>

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1. Summary of consultation

1.1 In September 2012 DECC published a consultation seeking views on the framework for measuring fuel poverty¹. This followed an independent review of fuel poverty carried out by Professor John Hills which concluded earlier that year in March. The consultation sought views on a range of issues including: changing the definition of fuel poverty; modifying elements of the methodology used in the calculations of the fuel poverty statistics and; the implications of changing the definition for the legislative framework. The consultation also announced that there would be a new fuel poverty strategy for England.

1.2 The consultation closed on 30 November 2012. Over 75 responses were received in total from a range of organisations. We are very grateful to all those organisations and individuals who responded to the consultation, and for the careful consideration of the issues which has helped to inform our thinking. The full list of organisations who responded is at Annex A.

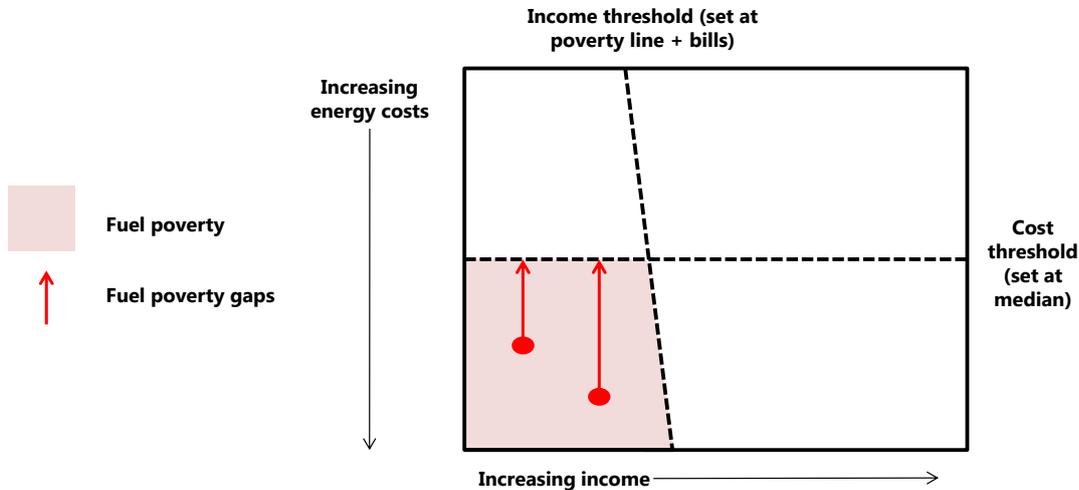
1.3 The consultation included nine questions. Below is a summary of the responses received on each of the questions asked, a discussion of the issues raised and the Government's intention in relation to them.

¹ The proposed changes set out in the consultation, and the Government's intention in this document, apply to England only.

2. Changing the definition of fuel poverty

Consultation question	
1	Do you agree with the Government's intention to change the definition [of fuel poverty] away from the 10% definition and adopt the Low Income High Costs approach?

2.1 The consultation set out the Government's intention to change the overall definition of fuel poverty based on the framework suggested by Professor Hills in his Review. This proposes that a household is in fuel poverty if it has an income below the poverty line (once fuel costs have been accounted for) and if its energy costs are above those for a typical (median) household. It also includes an indicator of the depth of the issue, through the fuel poverty gap, which measures the difference between a household's energy costs and what its cost would need to be in order for that household not to be fuel poor. This represents the Low Income High Costs (LIHC) framework.



2.2 All respondents commented on this question (though not all gave a definitive answer) and of those 80% supported some change to the definition. 55% of all responses supported changing the definition and the remainder (25%) supported changing the definition subject to amendments to certain elements of the proposed framework (namely the energy costs threshold). These are discussed further below. Around a fifth of respondents thought the existing definition of fuel poverty should be retained in some form, albeit with some amendments. However, as we set out in the consultation document, we do not believe that it

would be possible to address the flaws of the current “10% indicator”² through adjustments such as introducing an income threshold.

2.3 Some respondents agreed with the flaws of the existing indicator and felt that the LIHC would be a better measure of the problem of fuel poverty, enabling policies to be better designed and targeted. Others felt that focusing the new strategy and associated resources using the LIHC indicator would move us towards tackling the real problem. Some highlighted the advantage of the fuel poverty gap in measuring the depth of the problem. David Amess MP, who was the originator of the Private Members Bill that became the Warm Homes and Energy Conservation Act, welcomed the proposal to adopt the LIHC indicator and commented that ‘A new measure that takes into account low income and higher energy requirements is fairer than the current definition.’

2.4 One concern raised was the perceived additional complexity of the new indicator. It is worth setting out that much of the complexity exists within the current indicator, which also uses a detailed methodology to derive energy costs, to which a threshold is then applied. The LIHC differs in that it applies two thresholds to data derived using the same methodology. At its most basic, a household is fuel poor if it is below the poverty threshold and has higher than typical energy costs.

2.5 Some stakeholders suggested that this would mean the indicator could not be used on the ground in the same way the current definition can be (albeit in a much simplified form). Many respondents called for something that could be used at a local level. Whilst we agree this would be useful, we also need to have confidence that the indicator we use can generate robust figures at a national level, taking account of the (numerous) different factors which contribute to a household being in fuel poverty.

2.6 Another issue raised was whether and how the indicator reflected the affordability of energy costs, with one suggestion that the Minimum Income Standards approach should be adopted. The issue of affordability is discussed further below in relation to threshold setting.

Government intention

The majority of respondents supported changing the definition, though we recognise that there have been concerns raised with the complexity of the LIHC indicator. However we believe that the Low Income High Costs framework represents a more accurate definition to use as the basis for measuring fuel poverty and a significant improvement on the current definition. It also provides for an indicator which automatically tracks contemporary standards and is therefore unlikely to need updating in future years. We will therefore adopt the overall Low Income High Costs framework as the new indicator of fuel poverty. This will be used in future assessments of the scale of fuel poverty in England.

² Where a household is defined as being in fuel poverty if it would need to spend more than 10% of its income to achieve an adequate standard of warmth. That standard is set at 21 degrees for the main living room and 18 degrees for other rooms.

3. Setting the thresholds

Consultation question

2	Do you agree with the proposal for setting the income and energy costs thresholds? If not, what alternatives are there for setting these thresholds?
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3.1 The consultation set out the Government's proposals in relation to how to set the energy and income thresholds used in the LIHC definition. These were as proposed by Professor Hills. The income threshold is derived using the same methodology that is used for calculating the poverty line in DWP's Households Below Average Income analysis (i.e. 60% of median income) but using the data from the English Housing Survey (EHS) for consistency (i.e. so that the income data and energy costs information pertain to the same households). The income threshold is then adjusted to reflect required energy costs, reflecting the concern that a household's energy costs can push it into "poverty". The energy costs threshold is based on the median of all households' energy bills.³

Setting the income threshold

3.2 The majority (80%) of responses received to this question agreed with the proposal for setting the income threshold. There was relatively little discussion of this issue in the consultation responses and no suggestions put forward for a different approach. We therefore intend to use this approach in the methodology.

Government intention

For the income threshold we intend to use the method proposed by Professor Hills. That is we will derive the income threshold in the same way as the poverty threshold in the HBAI analysis and adjust it to take account of required energy costs.

Setting the energy costs threshold

3.3 The proposal for setting the energy costs threshold prompted more comment, with two thirds of those that responded to this question disagreeing with the approach we suggested and a third agreeing with the approach. The concerns raised included:

³ Both thresholds are set on the basis of equivalised data. See discussion relation to questions 4 and 5 below.

- That a threshold based on 100% of median energy costs does not represent an affordable threshold because of the poor quality of the housing stock.
- That the threshold is not responsive enough to changes in energy prices or improvements in energy efficiency standards.

Affordability

3.4 The issue of whether and how the LIHC indicator reflects the affordability of energy bills was raised by a number of stakeholders.

3.5 Many were supportive of the fuel poverty gap in providing a sense of the depth of the problem and allowing a distinction between different households and the level of the problem they are experiencing. However others felt that in breaking the link between bills and income (because the fuel poverty gap relates only to the energy costs threshold and there is no relationship between the two thresholds) the indicator does not adequately reflect the affordability of energy bills.

3.6 In theory, it would be possible to distinguish between fuel poor households on the basis of their income (i.e. on the basis of how far below the poverty line a household's income was) but in practice, because of concerns with the robustness of the income data (for example, government does not measure a poverty gap) it would not be possible to do so with sufficient confidence in the figures produced. For this reason we do not believe it is appropriate to do so on the basis of the income data that is currently used within the methodology.

3.7 Some stakeholders suggested that the concept of affordability of bills should be applied to all low income households. However one of the key conclusions of Professor Hills's review was that fuel poverty was a distinct issue from income poverty. All households on a low income could well experience pressure in meeting their household bills including their energy costs. The causes of this vary. For some, the cause could be having higher than typical energy costs. For others it could be having a low income. Those households who live in energy efficient properties have limited scope to reduce their bills. For many low income households, reducing energy costs to zero would not eliminate all difficulties in making ends meet.

3.8 It is also worth considering which households would be the priority for action under any particular threshold, given the reality of limited resources. The fuel poverty gap measures the depth of the problem that households are suffering, and those deepest in fuel poverty would be a priority for action. One of the advantages of the LIHC indicator is that as standards improve over time, other households become the focus of efforts to tackle fuel poverty. This gradual change in the composition of fuel poverty will help to inform the strategy for interventions.

3.9 Although we do not consider that all low income households are in fuel poverty, we recognise that rising energy prices affect everyone on a low income whether they are fuel

poor or not. The Government is committed to doing all we can to help keep bills down, as set out in the Framework for Action⁴.

Alternative proposals

3.10 One group of stakeholders put forward an alternative approach for setting the energy costs threshold. The 'Improving Hills' submission set out an approach where the cost threshold would be based on the median energy costs of LHC households and those households who have the potential for "cost-effective energy cost reductions" through improved energy efficiency.⁵ This would give a total of 4.1 million households in fuel poverty. Those proposing it argue that this would allow for some progress to be made in taking households out of fuel poverty if interventions were focused on those with cost effective potential.

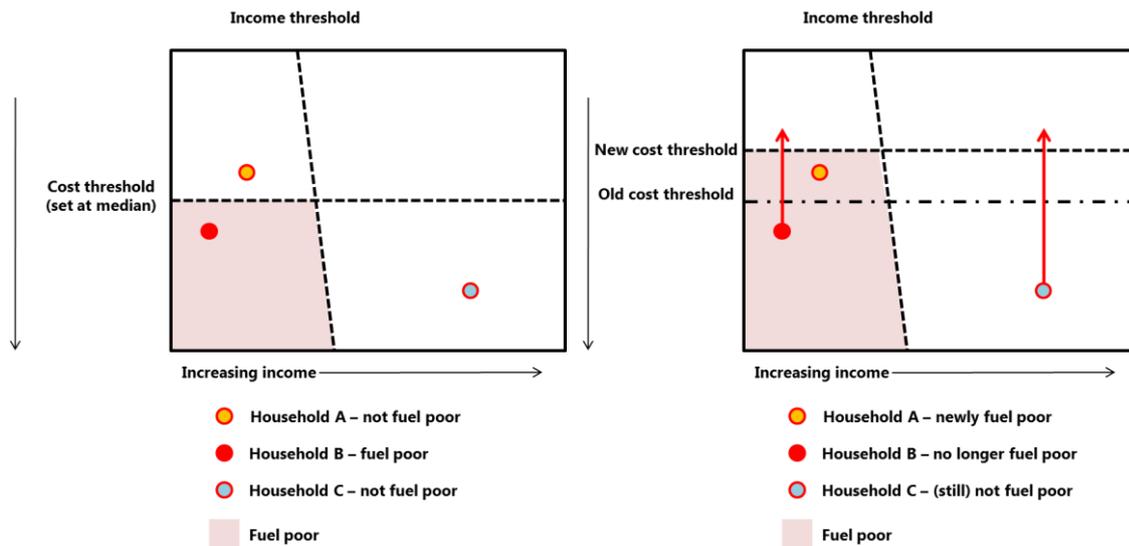
3.11 One of the key limitations of this approach is in the way that it would skew the priorities of any strategy towards households with costs close to the cost threshold in which there is 'cost effective potential' for energy cost reductions (as these are the households that would be most easily removed from fuel poverty) and away from the households with larger fuel poverty gaps who may not have such cost effective energy efficiency potential but who may nonetheless be targeted for support.

3.12 Furthermore, under this proposal there would still be a core of households (2.9 million according to the authors' calculations) who would be in fuel poverty after all the cost effective measures had been undertaken. As such we do not feel that the cost-effective potential offers a reasonable alternative for constructing the proposed cost threshold.

3.13 It is worth noting that as progress is made in addressing fuel poverty (e.g. through improved energy efficiency standards) the energy costs threshold will automatically move, classing new households as being fuel poor for the first time. This is illustrated in the figures below.

⁴ Fuel Poverty: a framework for action, DECC, May 2013 <https://www.gov.uk/government/publications/fuel-poverty-a-framework-for-future-action>

⁵ The Improving Hills team defined cost effective potential as being able to reduce the modelled energy costs of a household by 10% using a range of energy efficiency measures.



In the first figure, household A, although on a low income, is not fuel poor and has costs below the median costs threshold. Households B and C both have higher than typical energy costs but only Household B is fuel poor as they are also on a low income. Household C is not fuel poor, but does have higher than typical energy costs. Suppose that Household B receives assistance under ECO Affordable Warmth, and Household C decides to use the Green Deal to upgrade the energy efficiency of its home. Both of these actions ought to result in the bill of each household reducing. If the scale of improvements is sufficient then both of these household bills will now be below the median costs threshold (i.e. their energy costs are less than the typical household), as in the second figure. This has the effect for household B of moving them out of fuel poverty. But the changes to both households results in a shift to the energy costs threshold. This means that Household A, where there has been no improvement, is now brought into fuel poverty for the first time.

The choice of energy costs threshold is essentially a matter of judgement. However, this is largely unavoidable. The median has the advantage of being easily calculated and explained and also represents what is typical. We recognise that some households will fall the “wrong” side of the threshold but still represent a concern for many, including those on the frontline. At the same time, those in deepest fuel poverty will always be those furthest from the threshold. In this sense, focusing on the precise level of the threshold is a distraction away from the key aspects of the LHC framework which are to identify those with the deepest problem and to facilitate policy design and delivery. The way the threshold moves over time could also be seen as a more significant aspect than where it is initially fixed.

Government intention:

For all the reasons set out above, we intend to use the method proposed in the consultation i.e. to use the median of all households’ energy costs for that year.

4. Methodology issues

4.1 The consultation sought views on some elements of the methodology used to calculate the numbers of households in fuel poverty. Statistics on fuel poverty are currently calculated using information drawn from the English Housing Survey, combined with the Building Research Establishment Domestic Energy Model (BREDEM) to calculate household energy costs.

4.2 The new definition will be based on this existing methodology so there will not need to be any additional information gathering. The existing calculation takes into account a number of different factors based on the type of property and the occupant to calculate the households fuel bills. The full details can be found here:

<http://www.decc.gov.uk/assets/decc/Statistics/fuelpoverty/614-fuel-poverty-methodology-handbook.pdf> but it is worth noting that the methodology already addresses a number of elements that were raised as concerns in the consultation. In particular several respondents raised the issue of occupancy, and how the higher heating requirements of those that are in the house all day are addressed: the BREDEM model uses a number of different occupancy patterns to distinguish between those that are in the house all day, and those that are not.

4.3 However we are proposing to change the treatment of some of the data that is generated by EHS and BREDEM. In particular, the new definition entails equivalising income and energy costs in order to be able to compare households of a different size on the same scale. It also means deducting certain elements of income in order to give a better measure of disposable income. We therefore asked a number of questions in relation to these issues.

Consultation question	
3	Do you agree that incomes should be equivalised to take account of household size and composition?

4.4 In his Review, Professor Hills recommended that incomes be adjusted so that households with different numbers of occupants and ages can be compared to a single threshold. This reflects an understanding that the standard of living that a household is able to achieve is determined both by the household income and the number of people in the household. For example, a household of four on a given income will have a lower standard of living compared to a single person household on the same income. Weighting household incomes allows for a comparison of all households against a single threshold, and is known as equivalisation. Income data in the Households Below Average Income statistics are equivalised in this way.

4.5 In the consultation we proposed that incomes should be equivalised using the OECD derived factors used within the Households Below Average Income analysis. Over three quarters of respondents answered this question and the large majority agreed that incomes should be equivalised.

Government intention:

When using the LIHC framework we will equivalise incomes using the factors derived from the OECD for different household sizes and compositions.

Consultation question

4	Do you agree that energy costs should be equivalised to take account of household size and composition?
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4.6 In the same way as incomes are equivalised in order to be able to compare different sized households to a single threshold, Professor Hills also recommended that energy costs should be equivalised.

4.7 As with incomes, the majority of responses supported the intention to equivalise energy costs.

Government intention:

When using the LIHC framework, we will equivalise energy costs. Our intentions on how to do this are set out below in relation to question 5.

Consultation question

5	Do you agree with the method proposed for equivalising energy costs?
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4.8 Unlike income, there are no widely used factors for equivalising energy costs. In his review Professor Hills proposed a number of factors to be used as the basis of equivalising based on the different energy costs for different household types.

4.9 A total of 47 responses were received on this point (nearly two thirds of all respondees) with some submitting detailed analysis of this issue. 45% of those that responded agreed with the methodology proposed, while those that did not (55%) raised a number of issues.

4.10 One of the main issues raised was how the methodology took account of property size. Some stakeholders expressed a concern that the proposed method of equivalisation of energy costs means that the indicator does not capture low income households who may be living in relatively small energy inefficient properties. Respondees argued that these

households are at risk but will in general not be defined as fuel poor as their energy costs are lower than the median. A number of stakeholders (just under half of the 47 who responded to this question) supported a suggestion put forward in the 'Improving Hills' submission that energy costs should be equivalised by property size as well as household size in order to take this into account. They argue that the evidence suggests that these households are just as likely as larger households to be under-heating their property. However our view of the evidence is that it is those households with the highest costs, including those driven by the size of the property, are likely to be under-heating and suffering the impacts of being cold. This is borne out by Wilkinson's Cold Comfort study⁶ where overall the coldest homes are those where there is the overlap between low incomes and high standardised heating costs. As such, we continue to think that it is appropriate that these households are prioritised by the indicator.

4.11 It is worth noting that under either approach the vast majority of the worst rated properties (F &G) are captured so these properties will always be a priority for action, regardless of their size.

4.12 Another concern was the proposal to use household type (e.g. couple, single, couple with children etc.) rather than simply household size. The concern expressed was that the limited number of categories did not distinguish sufficiently between households of very different sizes i.e. all couple households with children would be given the same equivalisation factor regardless of the number of children in the household. We accept that this is an issue, and therefore intend to modify our approach so that factors based on household size are used. The factors used for income vary according to the age of the occupant i.e. they make a different adjustment for children than for additional adults. However we do not intend to make the same adjustment for the age of the occupant in relation to energy costs because this is not necessary.

4.13 Other responses were concerned with how occupancy patterns were reflected with a particular concern for those who might have higher heating requirements due to age/being at home for longer during the day. As mentioned above, the methodology already contains different occupancy patterns for those who are in the home during the day i.e. pensioners, unemployed and households with young children. As we set out in the consultation, additional data are being collected on dwelling temperatures. This will help ascertain whether certain groups have higher temperature requirements. Once the results are available we will assess whether further changes to the methodology are required.

⁶ Cold Comfort: The social and environmental determinants of excess winter deaths (1986-96), Paul Wilkinson et al, Joseph Rowntree Foundation, 2001 <http://www.jrf.org.uk/sites/files/jrf/jr101-determinants-winter-deaths.pdf>

Government intention:

On the basis of feedback from stakeholders, we intend to equalise by household size instead of the household type. However we continue to believe that property size is a factor in driving higher energy costs which in turn mean a household is more likely to be under-heating. We also believe it is appropriate for the indicator to capture this. We will therefore not equalise by property size.

Consultation question

6	Do you agree that the core indicator should calculate income after housing costs have been deducted?
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4.14 The data underpinning the fuel poverty numbers allow for the calculation of income both before and after housing costs. However the main fuel poverty numbers reported have always used Before Housing Costs (BHC) income. This issue has long been raised by stakeholders as a concern. Professor Hills recommended that housing costs could not be considered to be discretionary and so should not be included when calculating income.

4.15 Following on from Professor Hills' recommendation, we proposed that the main indicator of fuel poverty would use income after housing costs had been deducted.

4.16 We received 54 responses to this question, over 70% of consultation responses received overall. Respondents to the consultation overwhelmingly agreed that housing costs should be deducted from income as this better represented household disposable income.

4.17 As set out earlier, some stakeholders raised a concern as to the impact this approach has on the composition of fuel poor households, particularly with regard to pensioners. Although After Housing Costs income will form the basis of the statistics produced, some statistics using income before housing costs have been deducted will also be calculated.

Government intention:

In line with our proposal, we will remove housing costs from the calculation of income for the main indicator of fuel poverty. However we will continue to produce some of the statistics on a BHC basis as well as AHC.

Consultation question

7	Do you agree that extra cost benefits should continue to be included in the calculation of income, in line with current Government practice?
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4.18 The Review also recommended that the same approach to housing costs be used when considering other extra cost benefits such as Disability Living Allowance (DLA). However, in the consultation we did not propose to adopt Professor Hills's recommendation as it was not in line with how DLA and other similar benefits (e.g. attendance allowance) are treated in the income calculations by Government. For example, standard measures of income poverty do not take account of the additional costs associated with disability. Whilst it is recognised that there are additional costs associated with disability, research shows that these vary greatly in level and there is no general agreement on how to measure these costs.

4.19 A total of 53 consultees responded to this question. Almost all of those disagreed (92%) with the proposed approach in the consultation, considering that these benefits and DLA in particular should be excluded from the calculation of income. Many responses highlighted their wider view that all Government calculations of income should exclude DLA, and some suggested that until this was changed it was unlikely to change in other Government calculations.

Government intention:

As we set out in the consultation, excluding extra cost benefits would move away from current Government practice as standard measures of income poverty do not take account of the additional costs associated with disability. We acknowledge that this means the position of disabled people in the income distribution may therefore be somewhat upwardly biased, but, although there are additional costs associated with disability, research shows that these vary greatly in level and nature and there is no general agreement on how to measure these costs. However we recognise that this was an issue of concern amongst stakeholders and we therefore propose to undertake calculations for comparison purposes that exclude extra costs benefits such as DLA and attendance.

Finalised fuel poverty definition

The Government's intentions on changing the definition of fuel poverty, as outlined above, would give a final indicator which, in 2010, finds 2.5 million households to be fuel poor, with a total fuel poverty gap of £1 billion or £405 per household. Updated figures for 2011 using the 10% indicator and a version of the Low Income High Costs indicator were published on 16 May 2013. We intend to publish updated figures using the finalised definition in August 2013.

The composition of the final indicator is:

Household type	Number of households (thousands)	Percentage of LIHC households
couple with dependent child(ren)	578	23%
couple, no dependent child(ren) aged 60 or over	397	16%

couple, no dependent child(ren) under 60	225	9%
lone parent with dependent child(ren)	365	15%
one person aged 60 or over	301	12%
one person aged under 60	388	16%
other multi-person households	225	9%

5. Implications for the legislative framework

5.1 Action on fuel poverty is underpinned by the Warm Homes and Energy Conservation Act 2000. This sets out the Government's duty to ensure that no person in England or Wales is living in fuel poverty so far as reasonably practicable after an effective target date of 2016. As we set out in the consultation, moving to the LIHC indicator raises the question of how the new framework will relate to the target.

5.2 The framework we are adopting almost inevitably means that there will always be some degree of fuel poverty because half of all households will always be defined as having higher than average costs and it is difficult to imagine none of these households being low income. Nevertheless, we believe the framework suggested by Professor Hills more accurately reflects the long term nature of the problem we are tackling.

5.3 We therefore asked some questions in the consultation as to whether we should consider amending the legislation in light of the move to the LIHC indicator and if so how. We did not put forward a specific proposal in the consultation on either of these issues as we wanted to generate views on these questions to help inform our thinking.

Consultation question	
8	Do you agree that we should consider changing the legislation and if so do you have a view on how and where the target should be specified?

5.4 Over two thirds of those who responded answered this question and of those over 90% suggested that we should consider changing the legislation. There were differing views on exactly how this should be done. A few suggested that the date for achieving the timetable for meeting the existing target should simply be extended. Others felt that the form of target needed to be aligned with the LIHC framework. Whilst the overwhelming majority of responses felt that a target should be retained there were different views on exactly how this should be framed. A couple suggested that any new target should not be specified within the legislation itself but should be included in the strategy to allow for it to be reviewed. Others were keen to retain the statutory target.

5.5 Many stressed the need for any target to be ambitious and stretching but realistic and achievable. The need for interim milestones alongside any new target was also mentioned. There was also a large amount of support for supplementary indicators either to form the basis of the interim milestones in addition to (or even instead of) an LIHC based target. These included:

- Number of Low Income E, F and G rated properties.
- Annual SAP improvement
- Number of Excess Winter Deaths
- Number of low income households living in cold homes.

Consultation question	
9	Do you have a view on the form of target?

5.6 In the consultation we presented a number of possible options for changing the form of target, and asked for views. These were:

- The headcount indicator i.e. the total number of households in fuel poverty
- The fuel poverty gap: either the total gap or the household gap.
- The fuel poverty gap ratio

5.7 Half of those responding to the consultation answered this question. Whilst a few (less than 10%) wanted to retain the current target, most were divided between wanting the target to be focused on the headcount, while slightly more than 55% supported the use of the fuel poverty gap as the basis of any target. Of these a number suggested that the fuel poverty gap ratio would be most appropriate. As above in paragraph 5.5, some responses suggested it would also be possible to set a target against other indicators, with some supporting an approach that focused on improving the energy efficiency of homes (through measuring SAP improvement).

Government intention:

The issue of whether and how to change the target is a complex one. As we set out above, the LIHC will be adopted as the new indicator of fuel poverty. In light of this, we consider that some changes to the target are necessary to better reflect the problem as framed by the LIHC indicator.

In developing proposals we have taken account of a number of considerations including: whether any new target will drive the right action and provide a sensible framework for action; whether it can be easily understood and explained; and whether it reflects the impacts policies are having in improving people's circumstances.

Given these considerations, we are proposing a target that focuses on ensuring that the homes those households who are defined as being fuel poor using the LIHC indicator attain a certain standard of energy efficiency.

Further detail on our proposals in relation to the target can be found in the Framework for Action⁷.

⁷ Fuel Poverty: a framework for action, DECC, May 2013 <https://www.gov.uk/government/publications/fuel-poverty-a-framework-for-future-action>

Annex A: list of respondees

ACRE
Affinity Sutton
Age UK
Association for the Conservation of Energy
Blackpool Council
Dr Brenda Boardman
Prof Jonathan Bradshaw, University of York
British Gas
Bromfield Group
Carillion Energy Services
Central Bedfordshire Council
Centre for Sustainable Energy
Changeworks
Chartered Institute of Environment Health
Chartered Institute of Housing
Citizens Advice
Community Energy Action
Community Energy Plus
Consumer Focus
Cornwall Council
County Durham Energy & Fuel Poverty Partnership
Derby City Council
Dorset Community Action
DSDNI, Northern Ireland Assembly
EDF Energy
Elmbridge Borough Council
End Fuel Poverty Coalition
Energy Action Scotland
Energy Bill Revolution
Energy UK
Dr Eldin Fahmy, University of Bristol
Friends of the Earth
Fuel Poverty Advisory Group
Graham Thorne (individual)
Hampshire County Council
Herefordshire Council
Imperial University
Independent Age
Leeds City Council
Leonard Cheshire Disability
Liverpool City Financial Inclusion Forum
Liverpool City Region Child Poverty Commission
Livin'
London Borough of Islington
London Borough of Sutton
London Carbon Action Network
London Rebuilding Society
Macmillan Cancer Research
Manchester City Council
Markyate Parish Council
Mayor of London, Greater London Authority
Milton Keynes Council
Moat
Muscular Dystrophy Campaign
National Carbon Action Network
National Energy Action
National Grid
National Housing Federation
National Pensioners Convention
Newcastle City Council
North West Carbon Action Network
Orbit
Regenda
Riverside
RWE NPower
Scottish & Southern Energy
Scottish Fuel Poverty Forum
Scottish Power
Staffordshire County Council
Staffordshire Housing
Tameside Health and Wellbeing Board
The Hyde Group
West Midlands Carbon Action Network
West Midlands Public Health Observatory

