



**Submission by Good Energies Alliance Ireland
to the
Energy Poverty Consultation
Residential Energy Efficiency Division
Department of the Environment, Climate and Communications**

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Background

Good Energies Alliance Ireland (GEAI) is an environmental NGO, founded in 2011, situated in County Leitrim in Northwest of Ireland, who aims to ensure the wellbeing of people and communities on the island of Ireland and elsewhere through the protection and sustainable development of our environment, natural resources and our communities.

Our main objectives are:

- To carry out the activity of promotion of environmental and climate protection and monitoring of energy production and use on the island of Ireland and its territorial waters and elsewhere and any other related activities.
- To establish, promote and operate programmes and services with a view to fostering the economic, personal, cultural, recreational, and social well-being of the communities of Ballinaglera and wider areas and develop Ballinaglera Community Hall as an environmental and community resource centre and.

Q1. What further action could be taken to alleviate energy poverty through home energy upgrades? Please provide any relevant analysis or research to support your suggestions.

Improvement of “Energy Efficiency Measures – Action 2: Revising the eligibility criteria for our existing energy efficiency support schemes to ensure the programmes are better aligned with basic deprivation indicators.”: to include housing location indicators

It is proposed to add housing location indicators with the aim to have a better criterion for programmes to alleviate energy deprivation. In Ireland 37% of population lived in rural areas¹ in 2016 (Central Statistics Office, 2017). As Barrett, Farrel & Roantree. said “the consequences of energy prices inflation are much larger in rural households”². This is why government should include rural indicators in public policies on energy poverty. Consequently, rural dwellings should be considered households with the highest risk of poverty and deprivation.

Q2. What further action could be taken to alleviate energy poverty in the rental sector? Please provide any relevant analysis or research to support your suggestions.

New action: Creation of a communication plan to facilitate information for landlords and also for tenants.

We propose to create a new action based on a communication plan to target better that household living in energy poverty on in risk of energy poverty. The idea is to have specific information for landlords and specific information for tenants. This information must state why energy efficiency improvements should be done in that house. Available grants from the national government and from the European Union should be included. A recent report from Energy Poverty Alliance in Catalonia stated: “families don’t have enough information about their energy rights”. In the same report, a woman who participated in interviews, said: “In my case, to participate in the Energy Poverty Alliance has meant tranquillity, I no longer feel isolated, and now I have more information about my rights. I feel vulnerable but not helpless. I know what I can apply for and what I can’t”³.

Q3. In the areas of energy prices, meeting the cost of energy and consumer protection, what further action could be taken to alleviate energy poverty? Please provide any relevant analysis or research to support your suggestions.

Expansion of the “One Stop Shop” programme to promote personal service advice about energy poverty

The European Energy Poverty Observatory (EPOV) presented a report named “Tackling energy poverty through local actions” (Energy Poverty Advisor Hub, 2021)⁴. We can find

1 Central Statistics Office. (2017). Central Statistics Office. Retrieved from Census 2016 Profile 2 - Population Distribution and Movements: <https://www.cso.ie/en/csolatestnews/presspages/2017/census2016profile2-populationdistributionandmovements/>

2 Barret, M., Farrel, N., & Roantree, B. (2022, June). *Energy Poverty and Deprivation in Ireland*. Retrieved from Research Series Number 144: <https://www.esri.ie/system/files/publications/RS144.pdf>

3 . Delgado Ramisa, L., Viñas Martínez, P., D’Adda, G., Ustet, D., Sala barceló, E., Cardona i Parramon, P., . Carrere Balcells, J. (2022). Estat de l'exclusió residencial: impactes de la llei 24/2015 i altres mesures de resposta. Retrieved from Enginyeria sense fronteres Catalunya: <https://esf-cat.org/wp-content/uploads/2022/07/Estat-de-lexclusio-residencial-impactes-de-la-Llei-242015-i-altres-mesures-de-resposta-ODESC-ESF-PAH-APE-ASPB-2022-web.pdf>

4 Energy Poverty Advisor Hub. (2021, November 22). EPAH Report: Tackling energy poverty through local actions – Inspiring cases from across Europe. Retrieved from Energy Poverty Advisor Hub: <https://energy->

inspiring policies and actions against energy poverty there. One example is “Green Doctors” a programme done in United Kingdom where energy efficiency experts help vulnerable households to save money on their energy bills, stay warm and improve their living conditions. They also, identify causes and offers useful tips to tackle energy poverty. Another example is the “Energy Advice Points” (PAEs). PAEs is a free municipal service in Barcelona, who seeks social inclusion in green transition by mitigating energy poverty and generation labour opportunities. Any citizen can contact PAEs to find advice on their rights and on reducing the extra costs of basic supply services.

Based on these experiences we propose to expand the “One Stop Shop” programme with a bigger budget for NGOs and Social Associations to help people living in energy poverty or people who are at risk of energy poverty. They should have expertise on energy saving tips, energy efficiency schemes and knowledge on opportunities to switch energy providers to choose their best option.

Directive 2009/72/EC of the European Parliament concerning common rules for the internal market in electricity⁵; the Directive 2009/73/EC of the European Parliament concerning common rules for the internal market in natural gas⁶; the European Parliament and European Council suggest to Member States to take appropriate measures to protect vulnerable customers. Also, it is recommended that Member States shall ensure “high levels of consumer protection, particularly with respect to transparency regarding contractual terms and conditions, general information and dispute settlement mechanisms”.

The National Climate Action Plan⁷ includes the “Energy Supplier Handbook: which sets out, in plain English, the services an energy supplier will provide, and the quality levels offered, to vulnerable consumers.” Another action linked with our proposal is “CRU accredited price comparison websites - accredited comparison websites that can help consumers to find the best supplier and tariff for their needs”.

We propose to create a combination of these actions and provide NGOs with budget to help people, case by case, giving to them individual help.

Q4. In the area of governance, research, measurement, and evidence, what further action could be taken to alleviate energy poverty? Please provide any relevant analysis or research to support your suggestions.

New action: housing location indicators in research and measurement phase.

We propose that housing location indicators are used with the aim of having a better knowledge of energy poverty in Ireland. In Ireland 37% of population lived in rural areas⁸ in

poverty.ec.europa.eu/discover/practices-and-policies-toolkit/publications/epah-report-tackling-energy-poverty-through-local-actions-inspiring-cases-across-europe_en

5 European Union of 13 July 2009 concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0055:0093:EN:PDF>

6 European Parliament. (2009, August 14). Directive 2009/73/CE of 13 July concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC. Retrieved from Official Journal of the European Union: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0073&from=EN>

7 Department of the Environment, Climate and Communications; Department of the Taoiseach. (2021, November 4). Climate Action Plan 2021. Retrieved from Gov.ie: <https://www.gov.ie/en/publication/6223e-climate-action-plan-2021/>

8 Central Statistics Office. (2017). Central Statistics Office. Retrieved from Census 2016 Profile 2 - Population Distribution and Movements: <https://www.cso.ie/en/csolatestnews/presspages/2017/census2016profile2-populationdistributionandmovements/>

2016. As Sarpellini et al. said of her research of energy poverty: “The analysis of the relationship between geographical factors and energy poverty allowed us to gain a better understanding of the economic-financial impact of the specific energy aids provided by both public and private agencies, and thus of the relative importance and origin of the budget items assigned to that purposed.” (Scarpellini, Sanz Hernández, Moneva, Portillo-Tarragona, & López Rodríguez, 2019)⁹ It because of that, we recommend including housing location indicators in the measurement phase. In Ireland, and most European countries, remote areas are the same as rural areas.

Our recommendation is to maintain these indicators on the official website of Central Statistics Office to support future research.

Q5. Please also provide any additional relevant information or views that you would like to submit.

Transversal action: To include a housing location perspective as a new dimension for the future.

The Department of Communications, Climate Action & Environment expresses the aim of examining the impact on those experiencing fuel poverty in rural households in the National Energy Climate Action Plan¹⁰. Following that aim, we propose to incorporate a housing location perspective in the “Strategy to Combat Energy Poverty” and other policies linked to the energy poverty. Rural and urban households have different economic and social situation. Rural people have less information related to their energy rights. This situation creates inequalities between rural and urban households.

An article named “Fuel poverty in the UK: Is there a difference between rural and urban areas?”¹¹ (Roberts, Vera-Toscano, & Phimister, 2015) made a comparison between the rural and urban areas. Roberts et al. explain that “rural residents are often argued to be of particular disadvantage in terms of fuel poverty due to a lack of access to certain fuel types and inefficient housing stock”. About policies, they explain the same policy mechanisms may have different impacts because of their demographics. They advised that “extra attention needs to be paid to fuel poverty in rural areas in periods of rapidly rising energy prices since they are most vulnerable in such periods.” Finally, they suggest creating particular combination of households’ characteristics and social indicators to determine better energy poverty target.

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⁹ Scarpellini, S., Sanz Hernández, M., Moneva, J., Portillo-Tarragona, P., & López Rodríguez, M. (2019, January). Measurement of spatial socioeconomic impact of energy poverty. Retrieved from Energy Policy; ScienceDirect: <https://www.sciencedirect.com/science/article/abs/pii/S0301421518306657>

¹⁰ Department of the Environment, Climate and Communications; Department of the Taoiseach. (2021, November 4). Climate Action Plan 2021. Retrieved from Gov.ie: <https://www.gov.ie/en/publication/6223e-climate-action-plan-2021/>

¹¹ Roberts, D., Vera-Toscano, E., & Phimister, E. (2015, December). Fuel poverty in UH: Is there a difference between rural and urban areas? Retrieved from ScienceDirect; Energy Policy: <https://www.sciencedirect.com/science/article/abs/pii/S0301421515300781>

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