

Citizens Advice response to DECC consultation on the review of the Feed-in Tariffs scheme

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Introduction

As the statutory representative for consumers of the GB energy market the Citizens Advice Service welcomes the opportunity to respond to this consultation¹².

The Citizens Advice service provides free, independent, confidential and impartial advice to everyone on their rights and responsibilities. It values diversity, promotes equality and challenges discrimination. Since 1 April 2014, Citizens Advice service took on the powers of Consumer Futures to become the statutory representative for energy consumers across Great Britain.

The service aims:

- To provide the advice people need for the problems they face
- To improve the policies and practices that affect people's lives.

The Citizens Advice service is a network of nearly 400 independent advice centres that provide free, impartial advice from more than 3,500 locations in England and Wales, including GPs' surgeries, hospitals, community centres, county courts and magistrates courts, and mobile services both in rural areas and to serve particular dispersed groups. In 2012/13 the Citizens Advice service in England and Wales advised 2.3 million people on 6.6 million problems.

Since April 2012 we have also operated the Citizens Advice Consumer Service, formerly run as Consumer Direct by the OFT. This telephone helpline covers Great Britain and provides free, confidential and impartial advice on all consumer issues.

¹ DECC (2015) Consultation on a review of the Feed-in Tariffs scheme
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/467074/Consultation_on_a_review_of_the_feed-in_tariff_scheme.pdf

² DECC (2015) Impact Assessment
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/458662/IA_for_FITs_consultation_August_2015_-_FINAL_docx_e-signature_included_v2.pdf

Securing value for money

1. Do you agree or disagree with the proposed generation tariffs set out above? Please provide reasons to support your answer.

We agree with the intent of the proposals though are not in position to comment on the precise level of appropriate subsidy. We agree that in light of the current state of the Levy Control Framework (LCF) a planned spending envelope of £75-100mn is appropriate (assuming underlying assumptions about the amount of LCF committed continue to hold).

The Feed-in Tariff (FiT) scheme has been very successful in driving investment into microgeneration technologies, especially solar PV. While Citizens Advice has supported the use of these tariffs to enable microgeneration technologies to be accessible to as many consumers as possible, we have had continued concerns that due to the regressive nature of the funding of the scheme many consumers who are contributing to the scheme through charges on their energy bills are unable to access the benefits themselves.

With that in mind we would urge caution in the level of cuts that would leave the remainder of the scheme even less accessible to those consumers who would need to use finance to install systems. The proposed level of cuts could also seriously damage the ability of communities to take control of their energy use through self-generation. We would also encourage the Department to consider how the FiT scheme could be developed to allow greater accessibility for more vulnerable consumers. To that end while we support reducing generation tariff rates it is our belief that the precise levels need further consideration.

2. Do you agree or disagree that the updated assumptions produced by Parsons Brinckerhoff are reflective of the current costs of deployment for UK projects in your sector?

No answer.

3. Do you consider the proposed default degeneration pathways fairly reflect future cost and bill savings assumptions in

your sector? Please provide your reasoning, supported by appropriate evidence where possible.

No answer.

- 4. Do you consider it appropriate to harmonise the triggers for contingent degeneration across all technologies, and do you consider the proposed triggers will ensure tariffs reflect falling deployment costs? Please provide your reasoning supported by appropriate evidence where possible.**

No answer.

- 5. Which of the options for changing export tariff outlined above would best incentivise renewable electricity deployment while controlling costs and enabling the development of the PPA market? How should we account for the additional and avoided costs to suppliers associated with exports in setting the export tariff? Please provide reasons to support your answer.**

Citizens Advice considers that all three suggested measures for changing the export tariff have merit. However, it is our considered opinion that an annual re-setting of the export tariff to a wholesale power price would be the most appropriate.

- 6. Do you agree or disagree with the proposed changes to the indexation link under the FiTs scheme? Please provide reasons to support your answer.**

We agree with the proposed changes to use the Consumer Price Index (CPI) for generation and export tariffs for new installations.

- 7. Do you agree or disagree with the proposal not to include any additional technologies in the FiTs scheme? Please provide reasons to support your answer.**

Agree. We are unaware of any newly available technology that would fit within the remit of the scheme.

Cost control measures

8. Do you agree with the proposal to introduce deployment caps under the FiTs scheme? Please provide your reasoning.

Agree. We support the use of deployment caps to smooth out the peaks and troughs in the current system. At present the rush to install technologies before the next degression can lead to consumer detriment with householders feeling pressured to sign up before being fully sure of the details.

9. Do you agree or disagree with the proposed design of the system of caps (i.e. quarterly deployment caps broken down by technology and degression band)? If you disagree, are there any alternative approaches? Please provide your reasoning, making clear if your answer is different for different technologies or sectors.

Agree. The suggested system appears to be as simplified as possible which is important for consumers when understanding how the Feed-in Tariff works and what they are signing up to.

10. Do you agree or disagree with the proposed approach to implementing caps? If you disagree, are there any alternative approaches that you would suggest? Please provide your reasoning, making clear if your answer is different for different technologies or sectors and provide any views on what should happen to applications for FiTs for installations which miss out on a cap.

Agree. The proposed approach seems sensible as it will provide the most up to date measure of deployment available. However, it will be necessary to ensure consumers are fully aware of the potential variability in their Feed-in Tariff, or the need to resubmit, should their application be received after the cap has been reached.

11. If it is not possible to sufficiently control the costs of the scheme at a level that Government considers affordable and sustainable, what would be the impact of ending the provision of a generation tariff for new entrants to the scheme from January 2016, ahead of the 2018-19 timeframe or, alternatively, further reducing the size of the scheme's remaining budget available for the cap? Please consider the immediate and broader economic impacts and provide your reasoning.

Citizens Advice would be concerned that ending the generation tariff would effectively signal the end of the scheme. Many consumers have paid into this scheme, through their energy bills, since its inception in 2010 and they continue to pay for the legacy costs of the scheme which makes up the bulk of the costs added onto bills. From the evidence presented to date it is our opinion that the remaining costs can be kept in check and as such we want to see the remainder of the scheme made much more accessible to those consumers whose only means of access is through third party finance, social housing providers or fuel poverty programmes. It is unlikely they will be able to access the FiT via these means without the availability of a generation tariff. Arguably these are some of the people who could benefit most from having microgeneration on their homes.

As mentioned earlier in our answer to question 1 the regressive nature of this scheme's funding coupled with limited access for those consumers without personal savings or easy access to affordable finance has skewed the benefits of the scheme towards wealthier homeowners. It would be unfortunate if, as the scheme approaches the end, it does not retain some of the wider consumer access that we have seen in recent years.

Ensuring a greater level of access across all consumer groups can have potentially greater economic impact through the greater level of disposable income households have due to reduced electricity bills. In addition, any significant cut in support will inevitably lead to a loss in jobs in the sector that would have a significant economic impact for certain local areas.

12. What would be the impact of pausing applications to FiTs for new generators for a short specified period to allow the full implementation of the cost control mechanisms? Please consider the immediate and broader economic impacts and provide your reasoning.

Citizens Advice would not support a temporary pausing of applications during the implementation period of the new cost control measures. We have witnessed how the stop/start nature of other energy policies, namely the Energy Company

Obligation and Green Deal Home Improvement Fund, has led to job losses and eroded consumer confidence in energy efficiency installations. Therefore, it is very likely that such action will cause similar outcomes in the microgeneration sector potentially affecting the supply chain for microgeneration technologies in such a way that it cannot recover. Many microgeneration installers are small enterprises that are less able to absorb significant drops in workload and thus could realistically fold if such action were taken. This will affect consumer choice and competition in the sector.

As mentioned, a pause could likely lead to consumers having less confidence in what is already seen as a new and unknown market and people may be less keen to engage as the scheme restarts. Consumers look to signals from Government as a way of gauging trust in new products and services, so the consumer perception of any pausing of the scheme, although temporary, should not be underestimated.

13. What would be the impact if FiTs continued as an export-only tariff for new generators on reaching the cap of £75-100 million additional expenditure? Please provide your reasoning.

The biggest impact would be for those consumers who could not afford these technologies without support that helps to remove the barrier of upfront cost. The generation tariff helps to mitigate these costs especially for those people that would rely on either third-party financing or rent-a-roof schemes in order to install microgeneration technologies. There would also be little incentive for social housing providers to install alternatives to traditional technologies that would reduce the energy bills for their tenants. These groups of people are arguably some of the most in need with regards to ensuring affordable energy bills. Self-generation is one solution to enabling people to better manage their energy use and reduce their energy costs.

In addition, if the move was made to an export-only tariff for new generators care would need to be taken to mitigate against potential mis-selling of systems to people who are not aware of the changes to the tariff. There is a danger of a high level of detriment if the transition is not handled correctly.

14. Do you have any views on the use of competition to prioritise applications within a system of caps? What do you think are the advantages and disadvantages of this approach? What forms of competition may be appropriate and is this different for different sorts of installations? Please provide your reasoning.

We would not support the use of competition in prioritising applications within a system of caps. While it is difficult to comment without the detail of such a system

being provided in the consultation there is an overarching risk that it would add further complexity to a system that consumers already find confusing.

In addition, it is difficult to see how it could be ensured that a competitive system is fair. All consumers, whatever their circumstances, should be able to access the Feed-in Tariff should they choose to do so and, provided they have met all the criteria, receive the appropriate tariff.

15. Should FiTs be focussed on either particular technologies or particular groups (e.g. householders)? Please provide your reasoning.

As mentioned earlier, Citizens Advice has been concerned about accessibility to the scheme for as many consumer groups as possible. Studies have shown that microgeneration technologies have an important role to play in tackling fuel poverty³. We believe that serious consideration should be given to using FiTs to support a proportion of more vulnerable households and we would welcome further discussion with the Department regarding its potential.

16. Do you agree or disagree with the proposal to remove the ability of installations to extend their capacity under the FiTs scheme? Please provide your reasoning.

Disagree. We have serious reservations about this proposal given that it could have an adverse impact on community energy groups. It is not unreasonable to expect that community groups interested in self-generation might start off small and as they gain confidence choose to expand their capacity. Indeed it is likely there are existing systems begun in this way expecting to be allowed to expand, it would therefore be unreasonable to remove this ability for existing installations that have been developed under this presumption.

A great deal of work has been undertaken looking at the various benefits that community energy can bring to local people and these include social benefits as well as economic and environmental⁴. It would be a missed opportunity if we were not to capitalise on them and seems counterproductive to limit genuine, locally driven community energy.

While we understand that there is potentially some gaming of the system that could be happening it would be unfair to penalise communities that pay for the FiT

³ Changeworks (2014), *Using Solar PV to tackle fuel poverty*, http://www.changeworks.org.uk/sites/default/files/Using_Solar_PV_to_Tackle_Fuel_Poverty.pdf

⁴ National Trust (2012), *Social and economic benefits of community energy schemes*, http://www.ukcec.org/sites/default/files/files/NT%20report_%20Social%20and%20Economic%20Benefit%20of%20Community%20Energy.pdf

through their energy bills from accessing the benefits the Feed-in Tariff can bring to their local area.

Metering export and generation - smart meters and other options

17. Given our intention to move to fully metered exports for all generators, do you agree with the proposal that new and existing generators should be obliged to accept the offer of a smart meter (or advanced meter) when it is made by their supplier? Please provide reasoning for your response.

The consultation sets out that DECC's intention is to move to fully metered exports, but we are concerned that no information has been provided on the financial costs or benefits of this change. The report by Parsons Brinckerhoff Report published alongside the consultation has applied an export fraction for domestic solar PV at 53%⁵, which is higher than the current deemed level of 50%. Furthermore, this fraction was based on data from installations showing between 33% and 80% export. As such, we are concerned that there is a risk of scheme costs rising as a result of moving to metered export.

However, we also recognise that moving to metered export could enable behaviour change, so that generators use more of the power they generate in their own homes. This would maximise the benefit to generators (since the cost of import is higher than the cost of export) and minimise scheme costs. More communication and engagement with generators may be required ahead of any move to metered export. As the financial implications of the change are unclear, we would encourage further assessment of the possible impact of this change on overall scheme costs.

Beyond the merits of this change, we do not agree with the proposal that FiT generators should be obliged to accept smart meters, unless they were made aware of this requirement when they first signed up to the scheme. Introducing such an obligation would be a major change for the smart meter rollout, which to date has not been compulsory for any consumer group. The roll out is currently predicated on consumers making a positive choice to accept smart meters, placing an onus on suppliers to make a positive case for the benefits. Any diversion from this to a mandatory approach, even if for a relatively small group of FiTs generators, could have serious impact on the reputation of the programme, not least early in

⁵ See Parsons Brinckerhoff Report, page 15.

the roll out when due to technological and other concerns many consumers may - completely legitimately - wish to wait before they have one installed.

We would also urge DECC to clarify whether the existing FiT legislation could be used to compel FiT generators who have already had smart meters installed to claim FiT export payments based on metered export. Unless FiT generators were made aware of this when they accepted the smart meter, we believe their consent should be sought before they are required to accept metered export.

However, we recognise the potential benefits of moving to metered export, which can give generators more control, and could reduce scheme costs. We would expect FiT licensees to encourage the take up of smart meters by developing innovative smart meter services for FiT generators. In contrast, if smart meters are obligatory for these consumers, there may be less competitive pressure to develop such services.

Notwithstanding our objection to the proposal, we would also urge a number of changes to the stated plans if this obligation was introduced.

The consultation proposes a start date for the obligation as DCC go-live in 2016. This would mean some FiT generators are forced to accept a Smart Metering Equipment Technical Specification (SMETS)1 meter from their supplier when they are offered one. These meters will not have guaranteed interoperability until they are enrolled in the Data Communications Company (DCC), and SMETS1 meters are not expected to be enrolled immediately or be able to access all DCC services, so if the generator switched supplier before enrolment, their meters smart functionality could be lost. At this point the consumer would presumably revert to deemed export until enrollment of SMETS1 into the DCC.

Additionally, until SMETS1 meters are enrolled in the DCC there will not be a mechanism in place to enable FiT licensees - where they are different to the supplier - to access export information independently via the DCC. This would add complexity, since in these cases the export data would need to be shared between the supplier and the FiT licensee. Consumer consent would be required in order for this sharing to occur. As a result of these concerns related to the installation of SMETS1 meters, we would recommend that any obligation to accept smart meters is scheduled to be after the SMETS1 end date.

We are also concerned that some smart meter installations will face barriers to installation, and require substantial extra work and additional costs to overcome. There may be cases where suppliers consider these costs to be beyond their obligation to take 'all reasonable steps' to install a smart meter. When this occurs, we consider that it would not be fair to force FiT generators to pay these additional costs in order to fulfil their obligation under the FiT scheme. As such, the obligation should be changed to require generators to accept smart meters only when the

supplier offers one and is able to install the smart meter at no additional cost to the consumer.

There is uncertainty in the consultation document about the technical feasibility for upgrading advanced meters to provide export data in the non-domestic sector. As further work is done to consider the feasibility of this option, we would urge that it is considered against an alternative option of replacing these meters with SMETS2 smart meters. The enhanced functionality of these meters mean this option may have more net benefits, and it would also align with the government's stated intention to maximise the number of SMETS2 meters in the non-domestic sector.

The frequency of the data that consumers will be expected to provide under the proposal obligation is not made clear in the consultation. We would consider it appropriate for FiT generators to have the same data options for their export data as for their consumption data; that is, the FiT licensee could take daily readings as standard, with consent required for half hourly data collection and an option for monthly collection if the generator opts out.

18. Do you agree or disagree with the alternative proposal that new applicants must have a smart meter (or advanced meter) installed before applying to the FiTs scheme, with existing generators being obliged to accept the offer of a smart meter (or advanced meter) when it is made by their supplier? Please provide reasoning for your response.

We are not opposed in principle to the proposal for new generators⁶, subject to a number of safeguards to ensure that consumers are not unduly delayed or prevented from joining the FiT scheme. This is also contingent on the obligation not significantly increasing the cost of the smart meter rollout. In the absence of the obligation we would still expect that the benefits of smart meters, and the development of innovative services by suppliers, should be sufficient to encourage new FiT generators to accept a smart meter installation as part of the rollout.

The consultation sets out some timescales within which this obligation could be introduced. We believe that the most appropriate point for this would be after the 'new and replacement obligation' is in place. If it is introduced prior to this, some suppliers will not be able to provide compliant smart meters to consumers, who may be prevented from joining the scheme as a result.

Consumers should be protected from delays joining the scheme while waiting for smart meters. This could take the form of a mandate on suppliers to provide smart meters to consumers who request one for the purposes of joining the FiT scheme,

⁶ As set out in answer to question 17 we do not agree that existing generators should be required to accept smart meters.

or redress for consumers who are significantly delayed from joining the scheme while waiting for a smart meter from their supplier.

Some consumers may never be able to have a smart meter installed, or may not be able to have one installed until late in the rollout, for technical reasons. As set out in answer to question 17, some consumers could face significant extra costs to have a smart meter installed. We would encourage exemptions to the obligation for these case so that these consumers are still able to access the benefits of the FiT scheme.

19. Do you have any views on possible approaches to introducing remote reading for generation meters? Please provide reasoning for your response.

We would support the introduction of remote reading of generation meters if this represents good value for money for consumers, by reducing FiT scheme costs. We would expect that consumers should have the same protections as set out above for export metering; existing FiT generators should not be forced to accept a meter which is read remotely.

Effects of the Feed-in Tariffs scheme on grid management and costs

20. Do you agree or disagree that recipients of FiTs should be required to notify the relevant DNO of new installations as a condition of the scheme?

While we understand the an effective notification mechanism, it does not seem efficient to create a new obligation when one already exists under the *Electrical Safety Quality and Continuity Regulations 2002*.

To the extent that installers, as the party obligated to make the notification under these arrangements, are not fulfilling their obligations, then that is an issue that should be resolved at its source, rather than seeking to shift the point of obligation to the FiT recipient who may well be a householder with limited knowledge of the technology, who to contact, etc. It may also be that there are things the DNOs should be doing themselves to better publicise the requirements for distributed connections - the sort of 'stakeholder engagement' for which the networks are financially incentivised under the terms of their price settlements.

Our view is that these issues are better dealt with by Ofgem through the work it is already doing and importantly, in a way that is consistent with the terms of the RII0-ED1 that has only recently entered into force.

21. Do you agree or disagree the FiTs scheme should be amended to include requirements that help mitigate and limit the impact on grids such as requiring generation to be co-located with demand or storage?

While we appreciate the challenge distributed generation poses for electricity networks, this is an area that requires very careful consideration based on detailed evidence about the the problem and the costs and benefits of various requirements that might be contemplated. Absent this sort of comprehensive treatment in the consultation document, we are not able to either agree or disagree with this open-ended question.

22. Do you agree or disagree that the FiTs scheme or wider networks regime should be amended to ensure that generators pick-up the costs they impose on the network?

Disagree. While we understand the need to address the issue of the additional costs of microgeneration on the networks this needs to be considered in the wider context of the low-carbon transition rather than just on one scheme.

Unlike large-scale generators microgenerators cannot choose to relocate to areas with higher levels of available capacity. Forcing generators to pick-up any additional costs they may impose on an area network will mean that you are missing out on opportunities for individual and community energy projects that can deliver wider benefits to consumers and further excluding more vulnerable consumers.

As we potentially move to much higher levels of the electrification of heat the issue of additional pressure and therefore costs on networks must be addressed in a holistic way that ensures transparency, fairness and cost-effectiveness for all energy consumers and encourages generation of all scales.

Ensuring sustainability for anaerobic digestion

23. Do you agree or disagree that payments to newly accredited AD installations, at all scales are conditional on meeting the proposed sustainability criteria? Please provide your reasoning.

We agree that newly accredited AD installations should be conditional on meeting the proposed sustainability criteria given that the FiTs are supposed to support the UK's move to a low-carbon economy and this includes supporting sustainable fuel/feedstocks.

24. Do you agree or disagree that the proposed criteria and GHG trajectories set out above would set the necessary bar to meet our objective to incentivise the multiple benefits from waste-fed AD? Can you suggest alternative criteria which would help to achieve this goal? Please provide your reasoning and evidence for your answer.

No answer.

25. Do you agree or disagree with the proposed reporting system to underpin sustainability criteria? Please provide your reasoning.

No answer.

Administrative changes to the Feed-in Tariff scheme

26. Do you agree or disagree that only imported renewable electricity produced by generators in other EU member states that are under 5MW and commissioned on or after 1 April 2010 should be used to offset levelisation costs? Please provide your reasoning.

No answer.

27. Do you agree or disagree that we should introduce a cap on the amount of overseas generated renewable electricity that can be exempt from the costs of the scheme? Do you agree that the cap for 2016/17 should be calculated based on the number of GoOs recognised in 2013/14, increase by 10% twice to match the cap under the CfD Supplier Obligation?

No answer.

28. Do you agree or disagree with the proposed change to the FiTs legislation to refer to specific versions of relevant MCS standards? Please provide your reasoning.

We agree with the proposed change to the legislation and believe it to be an important addition to protecting consumers. However, we question the level of impact without any additional compliance mechanisms.

29. Do you agree or disagree with the Government's proposal to use interest accrued on the FiTs Levelisation Fund to part-fund administrative changes to the scheme which would otherwise be borne through public funding? Please provide your reasoning.

Agree. This seems a sensible use of the monies accrued although we would be interested to know what else this could have supported.

Energy efficiency criteria

30. Do you agree or disagree with the revision being considered to increase the energy efficiency threshold to EPC band C for anyone with an installation to which the criteria apply? Please provide your reasoning.

We have elsewhere proposed that the government sets a long term target of improving all homes in England to an EPC C standard, following the precedent of the government's new fuel poverty target for England. We propose target dates for achieving this standard as follows:

- Low income homes (all tenures) by 2025, as recommended by the government's Fuel Poverty Advisory Group⁷
- Social housing by 2025, as proposed by the government's 2010 Home Energy Management Strategy (although this advocated a target date of 2020)⁸
- Private rented homes by 2027, building upon the existing regulations⁹
- Owner occupier homes by 2035¹⁰

To achieve this, regulation should be used where appropriate to encourage consumers to improve the energy efficiency of their property. We think accessing the FiT is an appropriate point, given it involves government money and is voluntary, with some additional exceptions.

Where Solid Wall Insulation (SWI) is required to meet an EPC there is valid reason for an exception. The market for this improvement is relatively undeveloped as a consumer market and it suffers from substantial cost (and current lack of support scheme), impact on the external appearance of the property (including the related planning implications), and concerns around quality assurance. If consumers are required to install SWI to access the FiT they will be effectively arbitrarily excluded from the scheme, leading to a sub-optimal deployment pattern for FiTs.

We also disagree with the proposal that the EPC is obtained before the commissioning date of the PV installation, which would mean any energy efficiency

⁷FPAG (2015) *Fuel Poverty Advisory Group (for England) 12th annual report*, DECC

⁸ HM Government (2010) *Warm homes, greener homes - a strategy for home energy management*, Communities and Local Government & Department for Energy and Climate Change.

⁹ DECC (2015) *Private rented sector energy efficiency regulations (domestic)*, Department for Energy and Climate Change

¹⁰ Cambridge Econometrics & Verco (2015) *Building the future - the economic and fiscal impacts of making homes energy efficient*, Energy Bill Revolution

measures required to meet EPC band C are installed before this date. The hassle factor is a major barrier to making home improvements, such as energy efficiency installations. Allowing energy efficiency and solar panels to be installed at the same time can reduce hassle and potentially cost: a consumer may choose to have both measures installed by the same installer. Unlike with renewable heat systems, with PV there is no strong technical reason why energy efficiency measures need to be in place before installing the renewable generation technology. A better proposal would be if consumers are required to submit their EPC within a certain defined period after the installation of the PV system.

Better information for consumers is needed in regard to the EPC requirements. In our survey of consumers accessing FiTs, published this summer, Energy Performance Certificates (EPCs) were one of several areas where consumers said did not feel they had enough information or advice¹¹.

31. Do you agree or disagree with the revision being considered to remove FiTs eligibility from anyone with an installation to which the criteria apply who does not have at least a band C? Please provide your reasoning.

As per our response to Question 30, we support the application of a band C criteria for those applying for FiTs, with an exception in certain cases, such as the installation of Solid Wall Insulation.

32. Do you agree or disagree with the exceptions for community groups, schools and fuel poor households to the revision to the energy efficiency criteria being considered? Please provide your reasoning.

Agree. We agree with the rationales set out by the Department in the consultation document.

¹¹ FutureClimate and Purple Market Research (2015) Final Report to Citizens Advice: A review of consumer experience of solar PV systems
<https://www.citizensadvice.org.uk/Global/CitizensAdvice/essential%20services%20publications/Solar%20PV%20Report%20220615.pdf>.