



3rd Floor North
200 Aldersgate Street
London EC1A 4HD
Tel: 03000 231 231

citizensadvice.org.uk

4 October 2018

Response to Achieving our low-carbon pathway to 2030

This submission was prepared by Citizens Advice. Citizens Advice has statutory responsibilities to represent the interests of energy consumers in Great Britain. This document is entirely non-confidential and may be published on your website. If you would like to discuss any matter raised in more detail please do not hesitate to get in contact.

Dear colleague,

Citizens Advice welcomes the opportunity to respond to the consultation: Achieving our low-carbon pathway to 2030. The views below fall under question 10 of the consultation: do you have any other comments about this consultation?

Local ownership and renewable energy

The Welsh Government has set ambitious targets for renewable energy generation and local ownership in Wales. This includes 70% of generation to be renewable by 2030 and that all renewable energy projects should have some element of local ownership by 2020. We gave a detailed response to a consultation on locally owned renewables and what we think should be considered by Welsh Government, earlier this year.¹

While we appreciate supporting local ownership schemes could offer wider benefits than those directly observed by consumers, our recently published research² found even measurable benefits weren't being recorded by scheme managers. Whilst consumers thought they were saving money, they often did not have direct evidence such as a bill comparison to prove this to be the case.

The research also found information provision was often too informal, leaving consumers lacking clarity. For local ownership schemes to be prioritised in such a

¹ [Citizens Advice response to Welsh Government's call for evidence on locally owned renewables](#), 2018

² [Community Energy: maximising the contribution in a changing energy market](#), 2018

way, it will be important for schemes to have robust processes, to protect energy consumers in Wales. It will also be important that benefits are evidenced, whether this is cost or carbon savings. This should then feed into wider strategic thinking by the Welsh Government.

We also note the UK government recently consulted on the closure of Feed in Tariffs (FiTs). This change in policy environment will likely have an impact on local ownership of renewable generation. It is important that any decarbonisation strategy aligns with changes made to UK policy. Our response to the call for evidence for the future of small scale low carbon generation³ highlights our views on what should happen next.

Improving energy efficiency

As noted in the consultation, Wales has a disproportionate number of homes with solid walls, which require more costly energy efficiency interventions. Improving energy efficiency, however, can be the most sustainable way to reduce energy bills for Welsh consumers, whilst reducing greenhouse gas emissions.

The Welsh Government has existing programmes to improve the energy efficiency of housing for fuel poor consumers. These work alongside other programmes, such as the Energy Company Obligation (ECO). Our recent report into ECO finds that it can be poorly targeted with around:

- 1 in 5 fuel poor households falling outside the eligibility criteria, partly because some people do not claim the benefits they are entitled to; and
- 2 in 3 households meeting the eligibility criteria not being in fuel poverty.⁴

Schemes like Nest in Wales can help to address poor targeting from that scheme but there may still be people who lose out.

The suggestion of a long term residential retrofit programme, targeted at those who are able to pay or fall outside the scope of existing fuel poverty programmes is therefore welcomed. If the Welsh Government were to proceed with this, we hope it learns lessons from the Green Deal⁵. Namely, setting clear and informed aims and success criteria as well as creating appropriate incentives for consumers to engage with the scheme and to improve harder to treat homes.

³ [Citizens Advice response to the call for evidence, for the future of small scale low carbon generation](#), 2018

⁴ [Beyond ECO: the future of fuel poverty support](#), IPPR for Citizens Advice, 2018

⁵ [Green deal assessment](#), 2014

We set out evidence on the barriers consumers face in taking action and making energy efficiency improvements in a previous call for evidence requested by the Welsh Government⁶. It will be necessary to take on board the existing evidence of how consumers engage with energy efficiency schemes⁷. In 2016, we published a report which looked at how consumers think and make decisions about home energy efficiency improvements⁸. It identified four required areas to drive action: inspiring trust, motivating consumers, help to access energy efficiency measures and high quality service.

Citizens Advice would also expect any residential retrofit programme to build consumer protections into the scheme and take into account known problems⁹ with quality of work and energy efficiency related scams. Scams related to Green Deal and ECO appear to have been particularly prevalent in Wales. The Each Home Quality mark may go some way to deliver these standards and ensure consistency for consumers, subject to the effective implementation of that standard. They should also learn from positive aspects of consumer protection under Nest and Arbed¹⁰.

Finally, we agree with improving energy efficiency standards for new build homes and the subsequent economic benefits they could bring to consumers by avoiding retrofit activities. We would encourage further thought into how this will be delivered and enforced to ensure effective improvements are made and consumers have better outcomes. Citizens Advice recommends priority should be given to passive measures, and additional inputs such as heating or ventilation systems should be automated wherever possible to reduce consumer hassle, energy bills and discomfort¹¹.

Building an Electric Vehicle charging infrastructure in the right way

It is right that the Welsh Government is thinking about how best to build an Electric Vehicle (EV) charging infrastructure. Any charging infrastructure should ensure there are sufficient chargers in diverse locations and sufficient choice of network operators. Drivers should be able to use any charger without having to subscribe or

⁶ p6 [Energy Efficiency Call for Evidence response](#), Citizens Advice Cymru, 2015

⁷ [What's in it for me?](#), Consumer Futures, 2012

⁸ [Energising Homeowners](#), Citizens Advice, 2016

⁹ [What data tells us about new technology](#), Citizens Advice, 2018

¹⁰ [Research into quality assurance in energy efficiency and low carbon schemes in the domestic market](#) Pye Tait for Citizens Advice, 2015,

¹¹ [Taking Control](#) Citizens Advice October 2014

Patron HRH The Princess Royal

Chief Executive Gillian Guy

Citizens Advice is an operating name of the National Association of Citizens Advice Bureaux

Charity registration number 279057 VAT number 726 0202 76 Company limited by guarantee Registered number 1436945 England

Registered office: 3rd Floor North, 200 Aldersgate Street, London EC1A 4HD

become a member of the operator, which is in line with the requirements of the Alternative Fuels Infrastructure Regulation.¹²

In addition we would argue that for a smooth customer experience, interoperability between charger network operators is important, i.e. that operators settle payments in the background, whilst the driver should be able to store all their charging data in one account. Local Authorities, when they procure charging network operators, should be mindful of these points in their invitations to tender.

When developing a charging infrastructure, information about where public chargers are, which plug type they offer and their current status (i.e. operating or out of service) should be made easily available to drivers. There also needs to be transparent pricing at public chargers and the ability for consumers to compare prices, giving them the ability to identify the best deal.

Finally, responsibility over the maintenance of the charger should be clearly defined, whether this responsibility lies with the local authority, the manufacturer or the charger installer. Where this is not clear, it can lead to chargers falling into disrepair, causing inconvenience to consumers. Again, this may be something local authorities consider at the time of procurement.

Putting in place plans to achieve a low carbon future is essential and we are encouraged by the strategy that the Welsh Government has proposed. But it's crucial that this strategy is implemented well, acknowledging how it may affect energy consumers and seeking to serve their interests too. Once again, we are happy to meet for further elaboration on the comments and views expressed in this letter.

Yours Sincerely,

Rajni Nair

Senior Policy Researcher

¹² <https://www.gov.uk/guidance/regulations-alternative-fuels-infrastructure>