

Energy Saving Trust's response to the Northern Ireland Department for the Economy consultation on Policy Options for an “Energy One Stop Shop Implementation Plan”.

Context: The Department for the Economy’s Energy Strategy Call for Evidence and subsequent Energy Strategy Consultation, asked respondents for their views and evidence on the idea to establish a “One Stop Shop” that provided consumers and businesses with a single point of contact for information, advice and support in energy strategy related matters. The proposal received overwhelming support from respondents.

This public consultation sets out the One Stop Shop implementation plan. This includes options to define the service’s purpose, scope, types of services offered, the implementation roadmap and options for the management and governance of the One Stop Shop service.

QUESTION 1 – Do you agree with the Energy One Stop Shop underpinning principles? Please provide evidence to support any additional comments or suggestions.

Yes.

Energy Saving Trust supports the desire to implement a service focused on providing expertise and leadership across sectors, partnership working, impartiality and a consumer centric focus.

Northern Ireland currently faces three major challenges: energy affordability, energy security and meeting net zero and we believe that the One Stop Shop’s underpinning principles can help address these. Energy security and affordability are real concerns for many as the economic scarring caused by the pandemic has resulted in many being unable to pay bills. The cost-of-living crisis and war in Ukraine have further exacerbated the problem.

Affordability

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On affordability, the UK Government will spend billions this year across the United Kingdom to relieve the cost-of-living crisis. If every home of EPC (Energy Performance Certificate) D or below was improved, bills across the UK would be £8.1 billion lower every year at current prices and therefore an advice service which seeks to support improvements in energy efficiency will help to reduce both household and government spending on high energy bills. Making energy improvements in the home will also, importantly, reduce households' costs on an ongoing basis, especially beneficial given that bills are expected to remain high – both short and long term¹. With Northern Ireland's reliance on more expensive, unregulated off-gas heating, the savings from energy efficiency per household are likely to be even greater.

The cost-of-living crisis has also pushed many more households into fuel poverty. Incomes are a key driver of fuel poverty and with 34%-45% of the population in Northern Ireland deemed to be fuel poor², improving a household's ability to pay is crucial. Advice can support this by linking households to the financial support they are entitled to. This is a keyway to maximise the income of those in fuel poverty or at risk of falling into fuel poverty. In Scotland, the approach taken with Home Energy Scotland (which is funded by the Scottish Government and delivered by Energy Saving Trust) has demonstrated the major impact this can have. Total lifetime energy bill savings from the network since its inception are estimated to be well over a billion pounds.

Energy security

Improving our energy security will require significant economic and behavioural shifts. Providing expert advice and support to install cost saving energy efficiency measures and adopt low carbon heating technologies, such as heat pumps, could help people struggling the most whilst accelerating retrofit programmes and the installation of low carbon heating. There are additional benefits of effective advisory services:

- Improving security of supply and reducing our energy needs
- Accelerating a reduction in the amount of gas we import
- Increasing the deployment of heat pumps in homes and reducing fossil fuel consumption

¹ [eieg_the-energy-efficiency-investment-imperative-02_22.pdf\(theeeig.co.uk\)](#)

² https://www.nea.org.uk/wp-content/uploads/2023/01/NEA_Fuel-Poverty-Monitor-Executive-Summary-2021-22-final.pdf

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- Reducing system costs due to less overall demand on the grid than would otherwise be the case

Based on typical efficiencies, each heat pump (typically 300% efficient) will significantly reduce carbon emissions and deliver financial savings, depending on the reference fuel being used for comparison. The table below illustrates this case using Energy Saving Trust’s data collected in the last part of 2022 for Northern Ireland.

Energy Prices and CO2 Factors - Northern Ireland 2022					
	Gas	Oil	LPG	Electricity (Standard)	Heat pump @ 3.1 SPF
Energy Prices (p/kWh)	9.30	8.40	11.30	25.02	N/A
Energy Prices (p/kWh) assuming fossil boiler 85% efficient	10.94	9.88	13.29	N/A	8.34
Costs saved by using Heat Pump @ 300% efficient (typical)	24%	16%	37%	67%	N/A
CO2e Factors (kgCO2e/kWh)	0.21	0.30	0.24	0.26	N/A
CO2e Factors (kgCO2e/kWh) assuming boiler 85% efficient	0.248	0.354	0.276	N/A	0.086
Emissions saved by using Heat Pump (%)	65%	76%	69%	67%	N/A

Checked

17/01/2023	Gas rate assumed at 11,000 kWh (13.92p/kWh for 2,000 kWh then 8.25p) = weighted	£ 0.093	Source = Powertoswitch.co.uk
17/01/2023	Oil rate @ 87.5p litre - 10.4kWh per litre	£ 0.084	Source = BoilerJuice.com - 1 month historic average for NI
17/01/2023	Electricity rate used = Eco Pay from Power NI, standard rate - monthly direct debit	£ 0.2502	Source = PowerNI

Meeting net zero targets

There is a need to accelerate what the Northern Ireland Government is already doing in setting and developing targets for decarbonisation. This can be done by helping people to better understand what actions they need to take in their homes. Awareness raising will spark the societal change that is needed to meet our ambitious climate targets and generate the actions set out in the Northern Ireland Energy

Strategy:<https://www.economy-ni.gov.uk/sites/default/files/publications/economy/Energy-Strategy-for-Northern-Ireland-path-to-net-zero.pdf>

- Retrofit approximately 50,000 buildings each year around three times the current level. Ensuring all new buildings are net zero ready by 2026/27.
- “Our focus to 2030 will be ensuring that certain low-regret pathways remain open while focusing on removing the most carbon intensive sources of heating”.
- “A renewable electricity consumption target of at least 70% likely means that we will need to double our renewable generating capacity in order to meet new demands from heating our homes and powering our vehicles”.

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- New approaches will also be required to meet the targets set out in recently adopted Climate Change Bill whereby we seek to achieve 80% renewable electricity target by 2030.

Many people are not familiar with new technologies and will need different levels of support to understand technical and economic performance, reliability and impact on their homes and lifestyle. Several areas where advice would have significant impact are:

- Promoting and normalising the concept of low carbon heating as a low-risk option
- Engaging the public and generating public acceptance and support for the changes they will need to make on the path to net zero
- Accelerating retrofit and adoption of low carbon technologies – improving supply chains and making the 2050 and interim government targets more attainable
- Driving markets for everything from loft insulation to heat pumps and to major works such as installing solid wall insulation
- Helping to create new high skilled jobs in net zero-aligned sectors
- Delivering behavioural change training targeted at helping households reduce their energy bills by making changes in their everyday lives

The climate emergency is urgent and swift action is needed to progress towards a decarbonised future. Consumer research conducted by the Northern Ireland Utility Regulator identified that “increasing consumer knowledge of climate change and supporting consumers to engage in behaviours to limit climate change, will be critical to Northern Ireland’s achievement of net zero by 2050.”

https://www.uregni.gov.uk/files/uregni/media-files/Consumer%20research%20on%20climate%20change%20and%20energy%20transition_0.pdf

Northern Ireland has challenges, with 68% of homes heated by off-grid oil boilers, higher levels of fuel poverty than elsewhere in the UK, high reliance on personal vehicles and under-developed electric vehicle (EV) charging infrastructure. Achieving energy sector decarbonisation will require significant retrofit and renovation of existing properties. Whilst all the underpinning principles are correct, advice services such as the One Stop Shop have a key role to play in bridging the gap between property owners considering

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renovation and prospective suppliers of services and financing. They are key for the scaling up of energy renovation and lowering the burden on homeowners which is a key tenet of the Energy Strategy. https://www.renovate-europe.eu/wp-content/uploads/2022/10/REC_E3G_OSS-Brief_Final_Oct2022-1.pdf

QUESTION 2 – Do you agree with the definitions for each of the proposed principles? Please provide evidence to support any additional comments or suggestions.

Yes.

Energy Saving Trust agrees with the definitions and proposed principles outlined.

We support a national, independent, multi-channel service offering tailored advice and support which addresses issues that people face when trying to reduce and improve the way they use energy.

Consumer centric – the One Stop Shop will focus on delivering positive outcomes for consumers.

A key barrier to the retrofit process is that even where households have the desire or funding available to make the necessary changes, working out what they need to do next, which measures should be installed and in what order can be complex and confusing. It is therefore important that any advice service is consumer centric to ensure households experience a seamless customer journey that is both engaging and trustworthy. For example, [Home Energy Scotland](#) is a key resource for Scottish householders looking for help to make their homes more efficient and cheaper to heat. It includes a funding finder and several other popular online tools which help inform households how to live more sustainably and signposts them to help use less energy. The site also acts as an important route into to the Home Energy Scotland advice centre network and is also used to reinforce the advice provided by advisers to customers.

Provides tailored services – the One Stop Shop will meet the needs of individual consumer groups to ensure domestic and non-domestic consumers have access to the adequate types and levels of information, advice and support that they need.

A key, distinctive element of the policy landscape in Scotland and Wales (in the form of Home Energy Scotland, Business Energy Scotland and Nest in Wales) is the focus given

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to high quality, person-centred impartial advice to support people to act on energy efficiency.

Although many important and respected organisations already provide expert advice and support to households in parts of Northern Ireland, existing provision is currently patchy and variable when it needs to be widespread and consistent. A One Stop Shop service which complements and works alongside existing services, tailoring advice and support to the circumstances and needs of its clients, will be effective in helping people take action to cut their bills to benefit them in both the short and long term.

Energy Saving Trust is well positioned to help deliver the One Stop Shop. We have a track record of providing tailored advice services across all sectors envisaged within the range of domestic and non-domestic consumers listed and we can bring that considerable experience to bear to support customers in all consumer groups. We also have a well-established pattern of working in partnership with other advice providers both in Scotland and across the UK to optimise delivery as appropriate.

Has adequate sectoral and technical expertise – the One Stop Shop will provide up to date, accurate and factual information and advice on existing and upcoming products, technologies and services.

Tailored advice and support help people identify the right low carbon heating solutions and energy efficiency measures for their circumstances and property that will help makes them homes more efficient and cheaper to run. This means that it is important that consumers have access to expert advice and information to help them to make informed decisions, particularly in respect of product advances and upcoming technologies and services people may not be aware of.

Services provided on behalf of the Scottish Government demonstrate the power of breaking down barriers to change and providing one-to-one support. Results of the Home Energy Scotland 2021-2022 service review highlights how the service empowers households to make changes, with 44% installing an energy efficiency or renewable energy measure after receiving advice from a Home Energy Scotland adviser, and 38% planning to in the next six months.

It is therefore clearly important that the One Stop Shop provider has the depth of knowledge and expertise to provide effective advice that will accelerate households to take action.

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Delivers a trusted service – building consumer trust will be a key priority for the One Stop Shop.

From our own experience delivering the Home Energy Scotland service on behalf of the Scottish Government, we know how effective trusted advice and support is in getting people to act and make changes in their homes. HES provides advice that is free, impartial, and personally tailored to people’s circumstances and property characteristics. It is available to householders (owner occupiers, tenants) and smaller private landlords. Advice is delivered online, by phone and in person at home and at events. Each year the network helps more than 130,000 customers in Scotland and even with these very large volumes, customer satisfaction is extremely high with the network consistently exceeding its customer service targets. The impact of advice from a trusted service is significant. The lifetime carbon saved by customers using HES in 2021-22 is estimated to be more than 377,000 tonnes CO₂ and total lifetime energy bill savings from the network since its inception are estimated to be well over a billion pounds.

Provides impartial information and advice – the One Stop Shop will only provide factual, accurate and independent information.

A recent ONS survey, [Public opinions and social trends, Great Britain](#), showed that the proportion of adults already making changes to improve their home’s energy efficiency is now 24%. However, current processes for consumers considering changes to their home in Northern Ireland can be confusing, leaving significant opportunity for things to go wrong. Many households are also not aware of what changes will have to be made to meet targets as set out in [the Northern Ireland Energy Strategy](#).

To make these changes confidently households need consistent, comprehensive, impartial and tailored advice that offers them support to help them better insulate their homes to reduce the energy they need to use, while also transitioning to low carbon heating systems like heat pumps.

During consumer consultations by the Utility Regulator, a One Stop Shop was universally considered a useful concept that should be developed. Consumers highlighted the importance of it being delivered by an impartial and independent organisation and that information should be accessible and easy to understand. Factual, accurate and independent information must form the basis upon which any advice service is based.

<https://www.uregni.gov.uk/files/uregni/media->

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[files/Consumer%20research%20on%20climate%20change%20and%20energy%20transitio
n_0.pdf](#)

Delivers service in partnership with other bodies and organisations – the One Stop Shop will create partnerships with other organisations to ensure a presence across Northern Ireland and to maximise the benefits to consumers of the information, advice and support network in Northern Ireland.

The One Stop Shop will sit in a complex political and governmental landscape engaging with a range of government departments, together with their differing arm's length bodies, dealing with various aspects of the “Path to Net Zero.” Added to this, often there are Ministers from differing parties with differing political priorities which can invariably affect direction.

Any One Stop Shop must recognise the importance of partnerships as part of ensuring a simple customer journey, adding additionality and value to what is already there rather than duplicating services. A key feature of Home Energy Scotland (HES) is its partnerships with other trusted intermediary organisations, such as local charities, food banks, local authorities and local advice providers. HES has built referral pathways with these organisations to ensure the people who contact either HES or a partner organisation are directed to the right service that will meet their needs. This also means that the advice centres can partner with others working in these local areas to reach households through existing customer support networks and broaden the number of partners HES can refer consumers on to. In addition, it enables easier access to local events and outreach staff are available to visit households, where appropriate, in any part of Scotland. A more localised approach means that the advice provided to householders can be better tailored to reflect local circumstances (eg housing types, the installer base, the support available from local authorities) and in conjunction with existing services.

Underpinning principles outlined for the proposed One Stop Shop are clearly important and, if incorporated correctly, can:

- Engage and support people to make their homes more energy efficient affordable to run.
- Provide advice on using smart products and services.
- Engage and help people with the transition to low carbon heating.

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- Protect and empower customers on the essential transition.
- Ensure both domestic and non-domestic customers receive the advice and support required.
- Deliver services in partnership with other organisations to ensure a presence across Northern Ireland.

QUESTION 3 – Do you agree with the proposed strategic objectives for the Energy One Stop Shop? Please provide evidence to support any additional comments or suggestions.

Yes.

Energy Saving Trust would support the strategic objectives outlined whilst recognising that consultations are ongoing to determine the specific consumer groups that the One Stop Shop should inform, advise and support. We fully support the specific inclusion of the statement “with special regard to those who may be least able to.” Our experience suggests that a tiered approach is necessary to ensure that support is tailored and bespoke to consumer circumstances, ensuring complexity and vulnerability are handled correctly. [Home energy programmes in Scotland: 2022 report – Energy Saving Trust](#) further details in respect of those deemed vulnerable are included within the response to Question 5 below.

QUESTION 4 – Do you agree that the Energy One Stop Shop should provide advice, information and support to domestic consumers, micro, small and medium businesses and community energy groups? Please provide evidence to support any additional comments or suggestions.

Yes.

Energy Saving Trust supports the proposal to deliver advice across domestic consumers, micro, small and medium businesses and community energy groups, as they all have an essential part to play in the transition. The first principle in the Energy Strategy is placing individuals and consumers at the “Heart of our Energy future,” this

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involves the commitment to “make energy as simple as possible for everyone in society and develop policies that enable and protect consumers through the energy transition”.

Research conducted by Arup demonstrates that Small and Medium sized Enterprise (SMEs) make up an estimated 99.6% of businesses in Northern Ireland and only 0.4% of total enterprises in NI employ over 250 employees. SMES were found to experience a range of barriers that deter them from adopting energy efficiency measures, such as a lack of time and resource. Advice and guidance at the correct level can on average reduce energy bills by 18-25% through installation of energy efficiency measures and encouraging behaviour change. <https://energysavingtrust.org.uk/a-guide-energy-efficiency-in-the-workplace/>

There is an increasing recognition that community energy has the potential to create significant social, economic and environmental opportunities for communities in Northern Ireland. Whilst in the past these extended largely to a “share your roof” agreement with organisations like “Northern Ireland Community Energy (NICE)”, new low carbon heating opportunities and smart technologies provide real opportunities for community groups to promote renewables. Advice in these areas is normally about enabling those who wish to engage with energy, to do so in the most effective way with local knowledge and trust, ensuring that people are placed at the heart of the transition.

A recent independent review of Net Zero commissioned by the UK Government highlighted the need for community engagement and involvement. “Community-level participation, with trusted sources of information and advice, can be a key step to encouraging this individual action.” A range of case studies demonstrate action that local communities have taken to the benefit of local people.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1128689/mission-zero-independent-review.pdf

Examples of Energy Saving Trust service provision in these areas which might provide good practice for any One Stop Shop in Northern Ireland include:

Business Energy Scotland

Business Energy Scotland, delivered by Energy Saving Trust on behalf of the Scottish Government, encourages and supports SMEs to make positive changes to their premises and adopt new technologies, such as heat pumps, that reduce dependency on fossil fuels.

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The Scottish Government's Heat in Buildings Strategy [Heat in Buildings Strategy – achieving net zero emissions in Scotland's buildings – gov.scot \(www.gov.scot\)](#) announced the need to support Scottish businesses and communities with the transition. Using a mix of specialist one-to-one telephone support and a range of online tools and resources, the service offers free and impartial advice and support to SMEs to reduce their energy use and costs, as well as cut carbon. The service has been well-received with 9/10 customers recommending it. [Business Energy Scotland · Make Your Business Greener](#)

Scottish Community and Renewable Energy Scheme (CARES)

Local Energy Scotland administers and manages the Scottish Government's Community and Renewable Energy Scheme (CARES). CARES supports communities to engage with, participate in and benefit from the transition to net zero emissions.

Local Energy Scotland is a consortium of local agencies, including Energy Saving Trust, who deliver CARES, providing a range of services including:

- Free, expert and impartial advice from [local development officers](#).
- Free online [resources](#) including toolkits and project guides to help communities identify what might work for them.

Technical support through our [framework contractors](#) – for example, to complete a feasibility study or develop a renewable energy project.

- Access to project managers with the right experience to develop a given project.
- Mobilisation support for capital projects – design review, costs and procurement support.
- Ongoing support with project development and delivery.
- Mentoring and community online discussion in a [Facebook group](#)
- [Funding](#) through grants and no/low interest loans to develop projects.

The [Community Heat Development Programme](#), funded by the Scottish Government through CARES and delivered by [Local Energy Scotland](#), aims to support communities and groups of householders working together to make buildings in their communities more environmentally friendly to heat.

The Community Heat Development Programme will not pay to install energy efficiency measures or renewable technologies such as heat pumps. Instead, expert advisors will

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work with successful applicants to test their ideas and develop feasible options to change the way buildings are heated. Successful applicants also receive advice on next steps, including any potential routes for further funding [here](#). Further support is also available for communities and groups of householders across Scotland to develop their ideas about locally generated, low and zero carbon heat projects to tackle climate change.

Further information in respect of CARES and how community energy initiatives are managed are available at the undernoted links.

[Administering and managing CARES · Local Energy Scotland](#)

[How you can help your community – Energy Saving Trust](#)

[How community energy can help us get to net zero – Energy Saving Trust](#)

QUESTION 5 – Do you agree that the Energy One Stop Shop should take account of the needs of vulnerable domestic consumers, in particular those with low incomes, of pensionable age, digitally excluded, living with chronic ailment or disability or in rural areas? Please provide evidence to support any additional comments or suggestions.

Yes.

Northern Ireland Utility Regulator’s definition of vulnerability states ‘A consumer is deemed vulnerable when their personal characteristics or circumstances reduce their ability to engage effectively and achieve fair outcomes. A vulnerable consumer is significantly less able to protect or represent their interests and significantly more likely to suffer detrimental impacts on their health, wellbeing, or finances’

<https://www.uregni.gov.uk/files/uregni/media-files/1%20CPP%20Final%20Decisions%20April%202019%20with%20links.pdf>

Some consumer groups because of their characteristics or circumstances, will need more support to make the changes needed for the low carbon transition. Diversity and localism are important when providing services to people, particularly those in vulnerable circumstances and being small, nimble and innovative can translate into the delivery of some impactful services. Often energy advice providers need to combine complementary low-involvement advice provision methods (eg websites and telephone advice centres) with high-involvement approaches (eg face-to-face and in-home audits) that engage communities at a local level especially for these key groups.

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As an example of an especially vulnerable cohort, a recent presentation at an ‘Energy injustice in Gypsy, Roma and Traveller communities’ event presented data from Northern Ireland which demonstrated that only 1% of Travellers live to be more than 65 years of age and infant mortality in this group is three times that of the general population. Suicide rates are seven times higher and Traveller children have a significantly higher prevalence of mental illness. Difficulties accessing suitable housing, energy (electricity and gas) and transport often induce negative impacts on health, wellbeing and perceived quality of life. Building trust and confidence within these groupings requires considered approaches.

The way we use and generate energy will continue to transform in the coming years, affecting our jobs, the way we live and the way we do business. This transformation can be an opportunity to build a wealthier, healthier and fairer Northern Ireland, as well as helping us to meet our ambitious commitments to tackle climate change.

One overarching ambition is that Northern Ireland would have a [National Just Transition Planning Framework](#) like Scotland, and as proposed for Wales, which aims to build agreement among those likely to be impacted by the energy transition – including citizens, places, businesses and workers and minimise or reduce risks – for example, of costs falling on those with the least ability to pay.

It would also be worthwhile considering how support may differ depending on domestic tenure type – particularly whether a household is renting their home.

The One Stop Shop should consider households who will find themselves on the margins of vulnerability (eg those using between 8% and 10% of their income to heat their homes) who may be at risk of falling into fuel poverty. There is a risk that being overly prescriptive could mean that someone who is ‘nearly fuel poor’ but does not qualify for fuel poverty schemes may not be able to access appropriate support as their needs will differ to others in the ‘other domestic customers’ group. This segment of the population will be important in the context of retrofitting homes, where consumers may not have access to capital but could benefit from low-cost loans or innovative financing (eg

PACE – Property Assessed Clean Energy:

<https://www.investopedia.com/terms/p/property-assessed-clean-energy-pace-loan.asp>) <https://www.nea.org.uk/publications/uk-fuel-poverty-monitor-2020-21/>

Currently in Northern Ireland, those living in fuel poverty can access the Affordable Warmth scheme and those ‘nearly fuel’ poor will access Northern Ireland

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Sustainable Energy Programme (NISEP) support which offers a range of fully funded and partially funded grants for ‘vulnerable’ customers. These support mechanisms are well established and recognised and if changed then the Northern Ireland Executive should ensure continued or increased levels of grant support across the range of vulnerable customers under a new strategy and programme of work. This should look to expand on the existing twin track approach by offering bespoke support to all.

Unfortunately, many households in Northern Ireland face the prospect of cold homes, especially during the winter months. [Based on the 2016 Northern Ireland Housing Executive \(2016\) House condition survey.](#) Northern Ireland has an official fuel poverty rate of 22%. The most recent fuel poverty survey undertaken by the Consumer Council (Jan 2022) in Northern Ireland stated “34% of households are classified as being in fuel poverty (note that this estimate is based on the proportion of households spending more than 10% of net annual household income on energy) [also please note that 34% of all households equates to approximately 247,000 households in Northern Ireland] [2 \(consumercouncil.org.uk\)](#). More recently in June 2022 NEA working in partnership with market research company LucidTalk, <https://www.nea.org.uk/publications/lucidtalk-nea-ni-ni-wide-omnibus-poll-project/> undertook an NI wide representative survey to assess the impact of rising energy prices and the cost-of-living crisis on NI households. The findings of this study are stark, with 45% of households reportedly spending more than 10% of their income on energy costs. 80% of respondents have had to reduce their use of central heating and 1 in 10 have had to reduce the amount of food consumed or skip meals altogether to cope with rising costs.

In terms of which groups are categorised as ‘vulnerable consumers’ this process must be evidence-led and open to change. This was something that needed to be done in Wales as part of the creation of the Welsh Government’s new fuel poverty plan because in the decade since the last fuel poverty plan the make-up of those who were experiencing fuel poverty had changed. In 2008 72% of fuel poor households received a means-tested benefit, by 2018 only 31% did, meaning that 69% of those in fuel poverty in Wales were not receiving any means-tested benefits – a significant reversal in 10 years (see: <https://gov.wales/sites/default/files/statistics-and-research/2019-12/fuel-poverty-estimates-wales-2018.pdf>). While the circumstances in Northern Ireland differ, this example illustrates why it is so important to regularly assess who is in fuel poverty and for policy and support to be led by the evidence.

Using this logic several groups present themselves as being vulnerable to falling into fuel poverty. Recent analysis undertaken by the Centre for Research into Energy

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Demand Solutions (CREDS) through the FAIR project has identified several specific groups who are vulnerable to being in fuel poverty (as well as the double energy vulnerability of both fuel and transport poverty)

(<https://www.creds.ac.uk/publications/vulnerability-to-fuel-and-transport-poverty/>).

Black Asian and Minority Ethnic communities, single parent families and the recently re-housed were some of the additional groups identified by FAIR as being at risk of being vulnerable to fuel poverty. The FAIR research also confirms that people under 25 years of age, including student populations, are also at increased risk of living in fuel poverty.

The private rented and the social housing sector (NIHE and Housing Association), which together make up 34% of the Northern Ireland housing stock, could also be classified as a standalone group. The mechanism for bringing consumers from an owner occupier group through the energy transition will, to a large extent, be different to that for a private tenant or social housing tenant. Private renters and social housing tenants have much less control of the heat source and energy efficiency improvements made in their home, often live in flats or shared spaces and may interact differently with the property's energy suppliers if it is the property owner that selects the supplier and pays the bills on behalf of the tenants. There can also be a problem with incentivising in the private rented sector, as landlords pay for improvements, but it is the tenants that benefit from the improvements made (the so-called 'split incentive').

In a recent report [Cutting Energy Bills and Raising Standards for Private Renters](#) E3G look at the impact of implementing tighter minimum energy efficiency standards in the private rented sector in the UK. Key findings were:

- The new standards would save renters an average of £570 per year, leading to an aggregate benefit to the economy of £1.75bn per year.
- The government's own impact assessment shows that landlords could finance the average cost of upgrades (~£4,700) with interest only buy-to-let mortgage payments of around £200 per year, in a 4% interest rate environment.
- If the government wanted to go further to support landlords, it could change the rules to allow energy efficiency improvements to be offset against income tax rather than capital gains. This would benefit smaller landlords and remove an incentive to sell created by the current system.

In Scotland, Home Energy Scotland delivers a Private Rented Sector Landlord Loan (see: <https://www.homeenergyscotland.org/find-funding-grants-and-loans/private-landlord-loans/>) to help landlords improve their properties to meet minimum standards

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when these are introduced. Landlords must first contact Home Energy Scotland to receive impartial advice on what the best options will be for their property.

QUESTION 6 – Do you agree with the types of services and support that the Energy One Stop Shop should deliver? Please provide evidence to support any additional comments or suggestions.

Yes.

We warmly welcome the proposed types of services and support suggested as they encompass many of the policies we have argued for some time across the UK and clearly draw on best practice elsewhere.

Through our experiences delivering Home Energy Scotland, Business Energy Scotland and Nest in Wales, we know that it is not enough to just provide information, there needs to be engagement with people through a range of channels to encourage them seek the advice and support they need to make the right choices for their circumstances. This means having an up-to-date website and online information service as well as a phone service and information provided in written form. There also needs to be provision for in person interaction for those who cannot easily access other channels through, for example, in-home visits, community centres and GP surgeries. Information should be available in a variety of languages and in a form accessible by those with audio or visual impairments.

We outlined our support for a “promotion of standards and net zero kitemark certifications” approach in our response to the Department for the Economy’s 2021 Energy Strategy Consultation and welcome their inclusion here in the consultation as a proposed service. Invariably these will ensure that consumers are confident that any measures proposed are appropriate to their home, that they are fit for purpose and reliable, designed appropriately and installed by operatives who have the appropriate skills for their trade and who work to industry standards. The skills of the assessors, designers and installers are therefore of high importance. However, in addition to this, all indemnities, insurances and independent inspection regimes must be in place to support the consumer and maintain confidence in the service provided by the One Stop Shop. Recent presentations by SEAI (Sustainable Energy Authority of Ireland) [Energy](#)

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[Efficient Homes - Home Energy Upgrades And Grants | SEAI](#) also demonstrated that throughout their research phase, skills development was a key aspect of the entire retrofit process and budget certainty was a necessary element to ensure that the industry felt confident these measures were in place for the longer term.

A recent report completed by Energy Saving Trust on behalf of the Existing Homes Alliance entitled “Customer Journeys to Net Zero Homes” [Customer Journeys to Net Zero Homes | The Existing Homes Alliance | Scotland \(existinghomesalliancescotland.co.uk\)](#) confirms there will need to be clear and coherent customer journeys for householders which can help deal with any complexity around eligibility, multiple agencies and funding sources required to improve the energy efficiency of their homes and install and effectively use zero emissions heating systems. “A comprehensive and integrated service for customers is the key to enabling clear and simple journeys toward net zero homes. The report outlines four major elements required to make the One Stop Shop approach effective, which are: digital platform provision, advice services and technical support, finance and funding and awareness.”

In terms of “wrap-around” support it may be appropriate to consider facilitating display homes and businesses where innovative technologies and approaches can be viewed in operation by industry and households. In Scotland, Energy Saving Trust deliver a [Green Homes Network](#) and Green network for Business on behalf of the Scottish Government. Energy Saving Trust manages and promotes networks of exemplar homes and businesses to help encourage action by customers of Home Energy Scotland and Energy Efficiency Business Support. Energy Saving Trust has developed networks of more than 600 exemplar low and zero-carbon businesses, homes and social housing projects. Interested members of the public can make appointments to visit the properties of Green Network members or speak to the members themselves. This work forms part of the variety of information sources made available to consumers.

The recent consumer research published by the Northern Ireland Utility Regulator supports a varied approach as results show a range of sources of information being sought by consumers. On being asked about favourite sources of information, 41% of respondents stated internet search engines, 19% said energy efficiency companies/insulation companies, 17% said local councils and 15% said energy suppliers. Six percent offered other responses. This demonstrates that consumers want a variety of information sources but also suggests information and advice is fragmented at present.

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It is welcome to see a commitment to offer financial support to develop domestic and non-domestic energy efficiency and renewable electricity support schemes, additional to that already provided through existing streams. We suggest that wrap-around support may need to include financial support management as a core service element as this would enable the provision of a wholistic advisory service from inception.

The likelihood is that a one size fits all approach will not deliver the results required and so a range of integrated programmes and incentives should be considered for particular groups. For example, long term low or zero interest loans may work best for self-funding owner occupiers while grant funding may be necessary for those not able to fund their own energy efficiency improvements. The cost of necessary repairs pre-installation may also need to be factored in. This is something that has been piloted through the Scottish Government’s Home Energy Efficiency Programmes for Scotland (HEEPS) Equity Loan (see: <https://www.homeenergyscotland.org/find-funding-grants-and-loans/equity-loan/>)

Behaviour change must refer to day-to-day in-home behaviour as well as at the big trigger points in people’s lives (such as replacing a heating system or moving house). This means helping people to efficiently heat their homes and learning to use appliances optimally. These efforts will be increasingly aided by smart and flexible technologies, but it is important to recognise this crucial element of the behaviour change issue. Simplification, feedback, leveraging and goal setting as set out by International Energy Agency (IEA) in their research can also have a significant beneficial effect in changing behaviours. [The Potential of Behavioural Interventions for Optimising Energy Use at Home – Analysis - IEA](#)

One historic behaviour change pilot managed by the Energy Saving Trust on behalf of the Scottish Government, showed that as many as 30% of households found that their properties became too warm following the installation of energy efficient measures largely because they continued to use their heating systems as they had done before the measures were installed. Ensuring that households understand how to operate their heating systems effectively and economically will ensure that the environmental, comfort and fuel bill savings of the physical measures are maximised. Evidence from the second phase of this pilot showed that such advice is welcomed as part of an energy efficiency upgrade to the property and that it can be easily integrated alongside other advice provision. Coupling this with ‘smart’ enabled advice, where advisors are able (provided they have consumer consent) to see householders’ energy

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use and energy use patterns could play a key role in facilitating and further refining this type of advice – but would require the roll out of smart meters or similar technology.

We outlined a flavour of current service provision by Energy Saving Trust within Home Energy Scotland and Business Energy Scotland in our response to the Department for the Economy’s 2021 Energy Strategy Consultation which includes all aspects of the types of service and supports listed.

We remain convinced that the need for effective post-installation behavioural advice will become even more significant in the coming years as many of the most cost effective, easiest-to-implement energy efficiency measures will have already been installed.

QUESTION 7 – Should the Energy One Stop Shop deliver any other services or activities? If so, list your priorities. Please provide evidence to support any additional comments or suggestions.

Yes.

There are two broad additional areas to consider as a service or activity that the Energy One Stop Shop could deliver.

We agree that all services currently listed in the consultation will be essential in Northern Ireland’s transition to net zero.

Any extension of the One Stop Shop role would require careful consideration of how this is delivered due to the split of responsibilities over a large range of Departments in Northern Ireland³. In education for example, all schools are currently Eco schools registered with a range of voluntary bodies providing input, however, there remain clear

³ Responsibilities for energy in Northern Ireland sit across a range of Departments. Department for the Environment - overall responsibility for energy policy and economy; Department for Communities - responsibility for fuel poverty and domestic housing stock; Department of Finance - responsibility for building regulations, energy performance certification and inspections, Department of Agriculture, Environment and Rural Affairs- energy efficiency promotion in the public sector and overall carbon reporting; Invest NI is responsible for promotion of energy efficiency in the industrial and commercial sector. In addition, District Councils have fuel poverty, building regulation enforcement and community planning responsibilities and Housing, Health and Education each have large Non-Departmental Public bodies involved in day-to-day administration of their relevant estates.

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opportunities for partnerships and referral pathways together with energy awareness raising through effective digital means like that provided by the department of Education and Science and SEAI.

Firstly, there could be scope in the future to expand the areas of advice and support provided by the Energy One Stop Shop. Expanded areas could include public authorities and sustainable energy communities. These would need to be carefully managed to avoid any conflict with the strategic objectives. We note that these possible additional roles and responsibilities are not dissimilar from the scope of Energy Saving Trust’s existing work in other parts of the UK – particularly our work for Scottish Government through Home Energy Scotland (HES) and our work for Welsh Government through the Nest programme; however, working in partnership with other bodies and organisations will be of paramount importance to ensuring an effective service across Northern Ireland.

A second potential area is data management, which can be very important for success in any energy reduction initiative, and we outlined our support for a “central co-ordinating of activity” in our response to the Department for the Economy’s 2021 Energy Strategy Consultation. For example, central government is the largest aggregated energy consumer in Northern Ireland and whilst the Strategic Investment Board has developed the Energy Management Strategy and Action Plan to 2030, responsibility for it will fall to the Department for the Economy in April 2023. One key target includes “Lowering net energy consumption by 30% by 2030 across Government (from a 2016/17 baseline year).” [Energy Management Strategy and Action Plan to 2030 - Strategic Investment Board \(sibni.org\)](#). A foundation of this strategy has been the submission of data on all public sector buildings in Northern Ireland with a significant level of input in terms of data analytics to identify poor and improving performance. We are also aware that Northern Ireland Environment Link and Climate NI are working with DAERA on stakeholder engagement around new Climate Change Reporting Regulation for Public Bodies in NI (as part of the Climate Change Act 2022).

Another example is Energy Saving Trust’s provision of granular housing stock data in Scotland to provide a detailed picture of energy efficiency, fuel consumption, CO2 emissions, fuel poverty and suitability for low carbon heating systems across Council areas. These tools are available free of charge to local authorities and housing associations. Energy Saving Trust (EST) has extensive experience working with energy data, modelling building attributes and delivering housing stock databases for local, regional and national governments across the UK, and this could be beneficial in

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Northern Ireland subject to data sharing agreements, feasibility studies, modelling and development. Use of this data enables the modelling of energy improvement strategies for groups of buildings in a street to assess the impact of a single or group of measures. If data is available in the right format, it can be used to inform the setting and monitoring of targets and can be used for geo-targeting of funding interventions.

QUESTION 8 – Do you agree with the proposed initial list of consumer engagement channels for the Energy One Stop Shop? Please provide evidence to support any additional comments or suggestions.

Yes.

For any new service to be successful, marketing and communications are key to ensure public recognition and engagement. This includes maintaining brand and reputation, delivering marketing and communication campaigns, developing digital and social media activities, co-ordinating stakeholder engagement and directly supporting a range of programmes and services.

A suitably branded service which is run by an independent organisation is more likely to be trusted than if managed by the government or energy suppliers. Investment in promoting the service will be important to build trust and awareness in the initial set up phase.

Energy Saving Trust support the proposed consumer engagement channels, including a free telephone service. To ensure the advice service is accessible to all households, it is vital that advice provision is user-friendly and delivered via multiple channels which responds to people’s needs – whether that’s by phone, webchat, email, in person. This is particularly important for those in fuel poverty or the most vulnerable who may be digitally excluded.

As well as ensuring the service is accessible to all, from our experience delivering customer-centred advice, it is also important that customers receive advice that is specific to their personal circumstances and their property. Whilst there is a great deal of online advice available, it is often generic and an interactive advice tool on the service’s website would engage customers to start the process of decarbonising their homes and begin to understand what options are available to them.

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The use of social media channels is also important and allows content to be shared by partner organisations to help reach a wider audience. Paid-for social media activity can also be highly effective and allow demographic and geographic targeting with appropriate data.

Partnership engagement is also critical for brand awareness and service visibility, especially for those who are harder to reach or do not have digital access. Not only could partner organisations refer their customers to the One Stop Shop, but the service could also refer households into partner organisations where they may receive additional support.

From our experience of running the Welsh Government’s fuel poverty scheme, independent or partnership events (attending local support events or a stand at local supermarkets, etc) also provide opportunities to reach people who are lead busy lives and have limited capacity to engage or are digitally excluded. In the case of Northern Ireland, 32% of the working age population (16-65) have limited or no basic digital skills. That is higher than the [UK average of 26%](#). Furthermore, rural areas are already home to more than a third of the population, with this number growing, so events will play a particularly important role in engaging those who are harder to reach. Whilst an event programme can be resource intensive, (compared to a website for example) it can be particularly effective for these groups. Possible other examples which may be considered include physical advertising in the early phases and fliers being placed in GP offices, libraries, government buildings and other places where support measures are regularly advertised, so people know where to look for them.

QUESTION 9 – Do you agree with the proposed approach to refine and improve consumer engagement? Please provide evidence to support any additional comments or suggestions.

Additional communication channels will be considered on an ongoing basis to support any additional services brought on board or to target hard to reach consumer groups.

Yes.

In our experience, communication channels must be adaptive to the customer base as new services evolve with time. Constant evaluation of how to improve engagement strategies, amplify core messages and work better with partners must be a priority to

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reach those which are hard to reach. Energy Saving Trust has considerable experience in making use of existing consumer advice networks, working through partnerships and contractual arrangements with other organisations to directly provide face to face and wrap-around support.

Invariably, hard to reach groups provide challenges and there are no off the shelf solutions which will meet all situations however the need for continuous improvement and partnership working can provide many of the solutions.

QUESTION 10 – Do you agree with the proposal to commence the operation of the Energy One Stop Shop with a Pilot and that it should launch as soon as possible?

Yes

We support a pilot as a first step in a long-term implementation plan where its lessons inform later scaling-up. The One Stop Shop should be launched as soon as possible and refined in-flight as appropriate over time. Implementation of the NI Energy Strategy and Implementation plan are urgent and the initial step of advice provision is key to many of the other activities. It is important that the pilot does not create delays to later implementation which is a risk where there is a stand-alone pilot with no commitment beyond the pilot itself.

The issue of certainty, consistency and clarity for consumers will be tested if any One Stop Shop cannot provide early wrap-around support and whilst recognising the benefits listed for any pilot this process should only last for a minimum amount of time. Current proposals would not see a fully-fledged service until 2027, which we would consider too long in current circumstances.

For any initiative of this kind, long-term funding will be required to enhance services and the approach suggested for a multi-year One Stop Shop Implementation Project Plan is appropriate considering longer term governance and departmental budgeting requirements.

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QUESTION 11 – Do you agree with the proposed Energy One Stop Shop Implementation Roadmap? Please provide evidence to support any additional comments or suggestions.

Yes.

Energy Saving Trust welcomes the roadmap as an essential step in establishment of a national impartial and tailored advice service empowering households to take actions in their homes that are right for them.

One reservation we have is the length of any pilot extending to three years, however proposals to prepare the Implementation Project Plan in 2023, monitor the operation of the pilot and introduce refinements in accordance with lessons learned will invariably take some time. Given the urgency of Northern Ireland investing in the infrastructure to deliver net zero targets, a maximum two-year pilot would allow sufficient time for lessons learned before scaling up.

QUESTION 12 – Do you agree with the proposed services that would be available in Year 1 of the Pilot?

Yes, but with some reservations.

Energy Saving Trust would support the launch of the One Stop Shop in Year 1, but we have reservations in relation to initialising the service without relevant financial support measures in place. Consumers calling for wrap-around support in the first year would have years to await any suggested investment improvement, if appropriate, likely to cause frustration and dissatisfaction with the service.

To meet the ambition of the Northern Ireland government to retrofit 50,000 houses per annum, it will be necessary to actively engage with very large numbers of households as soon as possible. This will be important throughout the retrofit journey, from initial awareness raising through to the installation of improvements and optimising performance once installed. People will need help to navigate any complexity around eligibility, multiple government agencies and funding sources. To make this as effective as possible will require awareness raising and engagement activity and well publicised, high quality impartial advice and support for customers and the supply chain.

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Invariably there will be an initial period where each of the five services are developed to meet local demand, however, experience elsewhere can be brought to bear in advance of launch to ensure a smooth transition to the new service. Energy Saving Trust would see wrap-around support as being key to the ultimate success of the One Stop Shop and would recommend earlier adoption than Phase 3 as indicated.

Initial rolling out of such a service alongside an awareness campaign would help households understand why they need to make changes to their homes and what the right steps are to take at the right time. The potential return on investment is high, with low upfront costs associated with awareness-raising campaigns and provision of advice for households. Consumers must be placed at the heart of the process and by including them fully the service will have a much greater opportunity for success.

QUESTION 13 – Do you agree with the proposed additional services that the Energy One Stop Shop Pilot would introduce in Years 2 and 3?

Yes.

In evolving to become a gateway or single point of contact for energy efficiency, power, heat and transport issues as outlined, any such service will require a considerable breadth of experience. Energy Saving Trust has such experience, know that developing a service with such a wide remit will invariably involve establishment of effective service delivery partnerships.

As mentioned earlier, Home Energy Scotland works with several trusted partner organisations to build referral pathways which allow vulnerable householders access the right support. While most householders contact Home Energy Scotland through the well-publicised freephone number online or through outreach activity, a substantial number are referred from other organisations who have access to and are trusted by vulnerable householders. HES advisors also refer consumers who contact the service to partner organisations to ensure they get the support they need.

Other initiatives include our Energy Carers service which involves specialist energy advisors who provide an enhanced level of handholding, advocacy and support, delivered through home visits or, during COVID-19 restrictions, remotely, for particularly vulnerable households (in private rented or owner-occupied homes) to help them achieve affordable warmth. The service is available to those with issues relating to physical or mental health, disability, family circumstances, low income and expensive

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heating. Often these audiences are more likely to be in fuel poverty and are less able to make full use of the freephone service and website or email advice.

Energy and Net Zero behavioural research has traditionally been the remit of the Northern Ireland Utility Regulator, however we feel this sits well within the remit of the One Stop Shop as it develops through the pilot process. This research will inevitably feed into outreach activities and information campaigns as they arise.

QUESTION 14 – Do you agree with the proposed services that the Energy One Stop Shop may consider introducing from Year 4 onwards?

No, because some of these areas should be added in earlier.

As outlined in the consultation document additional services will evolve as the Energy Strategy develops. Wrap-around support is a desirable feature and one that forms part of all the One Stop Shops and similar advice services currently operating elsewhere throughout Ireland and the UK. Existing Homes Alliance in their report outline a range of European provision demonstrating key success factors as being a clear customer journey and flexible financial support <https://existinghomesalliancescotland.co.uk/wp-content/uploads/2023/01/Customer-Journeys-to-Net-Zero-Homes-research-summary-and-recommendations-Nov-2022-Final.pdf>.

Decision making, implementation and follow up support will require development of funding streams as envisaged within the Path to Net Zero Energy strategy, however Energy Saving Trust would suggest that wrap-around support is required much earlier than the four-year timespan suggested.

Supporting “networks and community champions” are a natural progression of the service as it develops in a comparable manner to some of the examples provided in question 4 above.

As outlined in our response to question 7 above, there is a need to rapidly develop systems for compilation of NI and sectoral statistics to assist with net zero reporting and monitoring and would clearly welcome early implementation. Measurement and the ability to report accurately on outcomes is essential to future success.

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Energy Saving Trust would support development of Kitemarks whilst recognising that a “one size fits all approach” may not be the answer in all areas. Currently building control within local councils have a remit for certification of some efficiency improvements and any action in this regard will have to be taken in partnership with appropriate agencies.

It is important that consumers are confident that work they have done on their homes will be to a good standard and will not leave them in a worse situation than when they started. The skills of the assessors, designers and installers are of paramount importance. However, in addition to this, protections need to be in place should any link in the supply chain fail. For example, by ensuring designers have indemnity insurance and installers use products that come with a manufacturer’s warranty as well as a workmanship warranty which is also backed up either by insurance or by a trade body to ensure that consumers have redress even if the original company ceases to trade. As added protection, independent inspections of the work need to be carried out and, should the work be deemed unsatisfactory, then the supplier should be required to rectify it. If there are frequent non-compliance issues then there needs to be robust enforcement including the swift removal of suppliers from any approved, public facing, supplier directory pending any investigation with a route to redress available to any consumer affected.

One fruitful approach to these consumer protection issues is requiring certification of installers under relevant industry standards such as the Microgeneration Certification Scheme (MCS), PAS2035 or equivalent certifications where public money is spent. Such an approach could and should be supported and promoted effectively through a One Stop Shop in concert with legislation as it develops in Northern Ireland.

For the services offered by the One Stop Shop (OSS) to be trusted, and for uptake to remain strong, consumers will have to be able to trust that the measures they receive through the programme will be installed correctly and operate as described. This will require installers to be sufficiently trained and experienced and, ideally, be able to evidence their competence through a recognised accreditation scheme or competent person scheme. Currently, schemes such as Trustmark and Microgeneration Certification Scheme (MCS) operate in a very limited way in Northern Ireland or not at all. It would be worthwhile considering how these schemes could be promoted in Northern Ireland or similar programmes set up to give additional confidence to consumers that the measures recommended through the OSS will be correctly installed by skilled tradespeople.

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QUESTION 15 – Do you agree with the proposal to create a new brand for the Energy One Stop Shop? Please suggest names for the service and evidence to support any additional comments or suggestions.

Yes, we agree with the proposal to create a new brand for the Energy One Stop Shop.

It is important to get the name and brand identity of the service right so it can be clearly understood, communicated and recognised by the public. Investment in the branding process will be important to ensure the service's success. The purpose of the service would also need to be clear to households, as well as its impartiality so that consumers feel they can trust the service. This means clarifying its place alongside the government and energy suppliers, for example.

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