

HEAT NETWORKS REGULATIONS END FUEL POVERTY COALITION RESPONSE 31st January 2025

The End Fuel Poverty Coalition is a <u>broad coalition of more than 70 anti-poverty, health, housing and environmental campaigners, charities, local authorities, trade unions and consumer organisations</u>. It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

These consultations plays a vital role in reforming Britain's broken energy system. In 2025, we urge all policy makers to understand how their decisions can affect the affordability of energy bill, avoiding discriminatory pricing, delivering longer-term reforms that bring down the cost of energy and improving the energy efficiency of homes.

We welcome these Consultations and fundamentally agree that Heat Network Regulations should deliver equivalent protections to those already enjoyed by gas and electricity consumers, however we want to raise the points below with reference to both the Ofgem and DESNZ's Heat Networks Consultations:

- **Disconnections**. We advocate for a full ban on disconnections and, if that's not possible, moving the groups that are currently 'disconnectable' outside of winter to the fully 'undisconnectable' category.
- Forced PPM. Vulnerability assessments to be conducted properly by heat networks
 to provide assurance that forced installs are adhering to the authorisation conditions.
 Fair pricing. We need to see more consideration given to how heat networks will be
 affordable (not just with 'fair' and 'reasonable' pricing) for people who connect to
 them. We also want to see much more consideration given to how heat network
 policy links to broader DESNZ and Ofgem fuel poverty / affordability work.
- Energy efficiency. Lots of heat networks owned or operated by social housing
 providers are very old, inefficient, and will cost unrealistic amounts to bring up to new
 technical efficiency standards. We are advocating for more consideration of heat
 networks within the Warm Homes Plan and broader energy efficiency schemes, e.g.
 heat networks are included in the Warm Homes Social Housing Fund.

Some of our members have already responded individually to the consultation and the wider End Fuel Poverty Coalition membership wish to add their support to the views put forward by Heat Trust and Chartered Insitute of Housing.

We would be grateful if you could continue to keep the Coalition informed about developments in this consultation.

About the End Fuel Poverty Coalition

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<u>consumer organisations</u>. It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

We believe that everybody has the right to a warm, dry home that they can afford to heat and power.

Members of the Coalition include: Action with Communities in Rural England, ACE Research, Advice for Renters, AgeUK, All Birmingham's Children, Austerity Action Group, Association of Green Councillors, Association of Local Energy Officers, Association for Decentralised Energy, Asthma + Lung UK, Basingstoke & Deane Borough Council, Beat the Cold, Brighton & Hove City Council, Bruton Town Council, Camden Federation of Private Tenants, Carers Trust, Child Poverty Action Group, Church Poverty Action, Chartered Institute of Environmental Health, Chartered Institute of Housing, Community Action Northumberland, Centre for Sustainable Energy, Climate Action Network West Midlands, Debt Justice, Disability Poverty Campaign Group, Disability Rights UK, E3G, EBICO, Energy Advice Line, Energy Cities, Exeter Community Energy, Fair Energy Campaign, Epilepsy Action, Fair By Design, Foster Support, Friends of the Earth, Fuel Poverty Action, Fuel Poverty Research Network, Generation Rent, Good Law Project, Greenpeace, Groundwork, Hackney Foodbank, Heat Trust, Home Start Oxford, Independent Age, Independent Food Aid Network, Inner City Life, Joseph Rowntree Foundation, Lambeth Pensioners Action Group, London Borough of Camden, London Borough of Lewisham, Marie Curie, Mencap, Mayor of London, MECC Trust, Moorland Climate Action, National Pensioners Convention, National Union of Students / Students Organising for Sustainability, NCB, National Energy Action, New Economics Foundation, National Federation of Women's Institutes, Northern Health Services Alliance, Oxford City Council, Positive Money Tower Hamlets, Plymouth Community Energy, Redcar & Cleveland Council, Repowering London, Retrofit Bruton, Right To Energy Coalition, Rossendale Valley Energy, Ryecroft Community Hub, Save the Children, Sense, Scope, Shaping Our Lives, Social Workers Union, South Dartmoor Community Energy, South East London Community Energy, Southwark Group of Tenants Organisations, South West London Law Centres, Stonewater Housing Association, Stop The Squeeze, Tamar Energy Community, Thinking Works, Uplift, UNISON, Warm & Well North Yorkshire, Warm & Well in Merton, Winter Warmth Network, Young Lives vs Cancer.

The Coalition is also part of the <u>Warm This Winter</u> campaign, the <u>End Child Poverty Coalition</u> and the <u>Renters Reform Coalition</u>. We work closely with <u>Energy Action Scotland</u>, <u>NEA Wales</u> and the <u>Fuel Poverty NI coalition</u>. The coordination for the <u>End Fuel Poverty Coalition</u> is provided by social enterprise <u>Campaign Collective</u>.

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