

# Written evidence submitted by Citizens Advice (DHH0040)

## 1. Executive summary

- As the statutory advocate for energy consumers, Citizens Advice welcomes the opportunity to submit evidence to the Business, Energy and Industrial Strategy Committee's Inquiry into Decarbonising heat in homes. Citizens Advice supports the government's current target for net zero emissions by 2050. More extensive policies will be needed if this target is to be met.
- Last year the UK government was the first major economy in the world to pass laws to end its contribution to global warming by 2050. The target means that we have to bring all greenhouse gas emissions to net zero, in other words carbon neutral, by 2050.
- People must be at the centre of plans for economic recovery. For energy and heat, this means ensuring that the energy transition is fair - whether that's in relation to costs, choice, consumer protections or decision making.
- A 'net zero homes guarantee' with coordinated information, protection and support will be essential to help people improve energy efficiency and move to low carbon heat.
- Citizens Advice research has found that people are not particular about the technologies employed to meet net zero. What they do want is to be confident that the low carbon heat technologies chosen for them are right for their homes and circumstances. Where consumers do want choice - it is related to their budget rather than the technology itself. Consumers have been clear that they want to see government action on 'why net zero is needed' and help for those who might struggle financially to make a change.
- We also know that people will want to retain control in some areas: people who have less control over the heat system in their home will need extra reassurance about cost and quality.
- Finally, to deliver on the UK's target of net zero emissions in a fair and just way Citizens Advice believes that a **national campaign to raise awareness of net zero** is needed, combined with a **national framework for delivery** and a **radical overhaul of consumer protections** to ensure all consumers are **informed, protected and supported** in the transition to net zero.

## 2. About Citizens Advice

2.1 Citizens Advice gives people the knowledge and the confidence they need to find their way forward - whoever they are, and whatever their problem.

2.2 Our network of independent charities offers confidential advice online, over the phone, and in person, for free.

2.3 We are the statutory advocate for energy consumers and run the national consumer helpline. Last year we helped 2.7 million people with 6.3 million problems.

2.4 We use our evidence to show how things can be improved for people.

## 3. Submission

## 1. What has been the impact of past and current policies for low carbon heat, and what lessons can be learnt, including examples from devolved administrations and international comparators?

3.1 Citizens Advice published *Lessons for net zero*<sup>1</sup>, a discussion paper outlining what we can learn from past energy efficiency and low carbon homes schemes in developing future policies to support the delivery of net zero. In that paper we consider the experience of the Energy Company Obligation (ECO), the Green Deal (GD), the Renewable Heat Incentive (RHI) and the Feed-in Tariff (FiT).

3.2 Understanding and installing energy efficiency and low carbon measures that are right for your home can be complex, and poorly designed support schemes can add to the confusion people experience. For example, the experience of our clients and advisors shows that the approach used by the ECO scheme often led to a poor experience for the consumer. The ECO scheme allows suppliers the flexibility to choose their own approach to meeting the government targets set for them. As a result, there is no easy way for consumers to find out what measures are on offer from each supplier.

3.3 Citizens Advice believes that **all new support schemes for energy efficiency and low carbon measures should be designed with appropriate monitoring, advice and support to help consumers navigate the complexity.**

3.4 Energy efficiency and low carbon schemes have often been marred by mis-selling. The launch of the Green Deal, in particular, saw a rapid increase in related scams. Common cases involved individuals or companies not registered with the scheme using the Green Deal brand to scam people on their doorstep. However, some cases of mis-selling were from firms registered with the Green Deal's oversight body, Home Energy and Lifestyle Management Systems (HELMS), a Green Deal provider operating primarily in Scotland, caused problems for thousands of customers, who have been left out of pocket through hidden costs. **Future schemes must make clear that the government will take action to protect people from rogue traders and scams.**

3.5 The design of schemes is critical to ensure that consumers are protected from unintended consequences. One such example is the emergence of third party intermediaries to help people install small-scale renewable generation or heat. These intermediaries would provide and install renewable systems at no upfront cost to the consumer provided they sign over the rights to either their FiT or RHI payments. While many of these solutions may well have come from a desire to increase access to these schemes they have led to a variety of unintended consequences for the consumer. Examples include consumers continuing to pay for systems that no longer work, or being unable to sell their home because the initial financial agreement has been sold on and it is not clear who now "owns" their system. Over 29 million homes will need to be retrofitted with energy efficiency and low-carbon heat measures by 2050<sup>2</sup>. **Schemes should be designed from the outset to be fair and accessible to all, not just those with the ability to meet the upfront costs required.**

3.6 Previous schemes have had well-documented problems with substandard work, particularly with insulation installations through the ECO scheme. Citizens Advice has had frequent contact from consumers raising issues around poorly installed insulation - usually cavity wall insulation - which

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<sup>1</sup> Citizens Advice (2020) [Lessons for net zero](#)

<sup>2</sup> Committee on Climate Change (2019), [UK Housing: Fit for the future?](#)

has left them with long-term problems in their homes that are costly to resolve, disruptive and distressing<sup>3</sup>.

3.7 Issues of quality are a particular risk for energy efficiency and low carbon technologies. Few people are familiar with these technologies and it is hard to tell good work from bad. With products like insulation, faults may be invisible and take months or even years to come to light<sup>4</sup>. The newly developed Green Homes Grant scheme (GHG) requires that installers are registered to Trustmark. However, this scheme is still not well known amongst consumers and those outside the GHG scheme might not be covered. This is confusing to customers, making it easier for rogue traders to operate. We believe that there should be a **single, comprehensive net zero homes protection framework** for providers and installers of low carbon home improvements regardless of whether measures are installed under a government supported scheme or not.

3.8 If something does go wrong with the installation of a new energy efficiency measure or low carbon heating system, it is important that the consumer can quickly and easily get it resolved. But too often in past schemes people have faced a redress process that is confusing, difficult and frustrating. The responsibility of installers and scheme bodies to consumers should not end when the work is completed.

3.9 Analysis of consumer contacts to Citizens Advice show that many consumers have struggled to understand how to get their complaint resolved. Others find none of the organisations involved are willing to take responsibility for the work, and their complaints are disputed between manufacturers and installers, contractors and subcontractors, and installers and guarantee providers<sup>5</sup>.

3.10 While some level of redress does exist for low carbon measures, this remains patchy - with many people falling between the cracks while organisations dispute who is responsible for issues raised by the consumer. Citizens Advice believes that provision of a **trusted redress process that covers all energy efficiency and low carbon measures** is needed to protect customers, improve the reputation of the sector and build consumer confidence for a nationwide rollout of these measures. This should form part of a package of information, protection and support, as set out in our recommendations for a 'net zero homes guarantee'<sup>6</sup>.

## **2. What key policies, priorities and timelines should be included in the Government's forthcoming 'Buildings and Heat Strategy' to ensure that the UK is on track to deliver Net Zero? What are the most urgent decisions and actions that need to be taken over the course of this Parliament (by 2024)?**

3.11 Tackling the climate crisis is one of the most pressing challenges facing societies today, and meeting the UK's net zero target will have major implications for the people Citizens Advice help every day. **As a priority, the government's forthcoming 'Heat and Buildings Strategy' must include specific consumer protections and a programme of support to ensure consumers are at the heart of the low-carbon transition.**

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<sup>3</sup> Citizens Advice (2019), [What data tells us about new energy technology](#)

<sup>4</sup> OFT (2012), [Home Insulation: A report on the call for evidence carried out by the UK Office of Fair Trading](#)

<sup>5</sup> Citizens Advice, internal analysis of complaints made to the consumer service regarding home energy technologies, January - June 2017

<sup>6</sup> Citizens Advice (2020), [Net Zero Homes Guarantee](#)

3.12 Citizens Advice welcomes the early indications that this strategy will incorporate schemes to support low/no regrets energy efficiency improvements as well as set out the road map for low carbon heat. However, we would like to see further detail within the strategy about the plans to inform, support and protect consumers on the path to net zero. In order to reach our net zero goals, people will be asked to make significant changes in relation to how they use and interact with the energy and heat in their homes. A number of factors will impact on how well equipped they are to make decisions about these changes, how they might navigate the systems and options available to them. These include their housing status, financial circumstances, health, age, lifestyle and digital skills.

3.13 Citizens Advice is calling for the government to establish a net zero homes guarantee as part of the Heat and Buildings Strategy. This would be a government-backed scheme focused on giving people the confidence to install low carbon heating systems or energy efficiency measures. A net zero homes guarantee would help people to make informed decisions, and establish simple, enforceable, protections, so people can engage with confidence. It must include support for people through funding, finance and incentives. A net zero homes guarantee will be essential to:

- Improve the energy efficiency performance of homes, keeping people's bills low and homes warm.
- Replace fossil fuel based heating systems and move homes on to low carbon options to achieve the net zero ambition.

3.14 The energy market is rapidly evolving. While some of the changes required may be a while away, many of the conversations that will enable them are happening right now across government, regulators, industry and other organisations. Over the last 2 years, Citizens Advice has completed a programme of research in relation to the future energy market. We have explored consumer perceptions of market models and protections, identified accessibility barriers, completed legal and market analysis, tested consumer comprehension of new technologies and services and used our existing knowledge of the energy market to produce a set of reports and recommendations to support work in this area.

3.15 Our programme of research concluded with a set of '[principles for a future energy market](#)'<sup>7</sup>. Our vision is of a **future energy market that is inclusive by design and recognises the essential nature of energy supply. It should facilitate and encourage innovation, be accessible by all and treat everybody fairly, regardless of their circumstances.** This means that it should deliver:

- A seamless consumer journey
- Control for consumers and citizens
- A fair way of paying for the energy system
- High standards of regulation and governance

The principles all apply to the decarbonisation of heat and should be embedded into the government's approach to the future of heat.

3.16 From policy and support mechanisms to advice and redress options, consumer protections are vital if we expect people to engage with confidence. Regardless of how complex some of these issues might seem, the approach taken to protect consumers does not have to be complicated or confusing for people. It will require a strategic and joined up approach at all levels, to ensure that there is a seamless consumer journey for everybody who needs help - regardless of what the issue is,

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<sup>7</sup> Citizens Advice (2020) [Setting out principles for a future energy market](#)

how they get in touch or what they need help with.

### **3. Which technologies are the most viable to deliver the decarbonisation of heating, and what would be the most appropriate mix of technologies across the UK?**

3.17 The viability of energy efficiency and low carbon heating measures at the household level is well known. The CCC has undertaken extensive research to identify the best mix of these technologies to achieve the net zero emissions target in the most cost effective manner.

3.18 However, what is less well known is what the geographical spread of these technologies should look like based on rurality, population demographics, housing type and construction, and current gas-grid access.

3.19 The technological solutions to decarbonising heating will look different depending on a number of factors, some of which we have identified above. To understand which technologies are the most viable for any given area will require a significant upskilling of expertise at the local level and national support to ensure local or regional authorities are adequately resourced to make the most appropriate decisions for their citizens.

3.20 Changes to people's homes in the form of their heating systems could have far reaching consequences for decades to come. Therefore, it is critical that those making the decisions have all the right tools and expertise at their disposal. Citizens Advice believes that the best way to do this in a fair, transparent and democratic way would be to have a **national framework to support local net zero delivery**.

3.21 Activities related to energy and climate change could play a significant role as local authorities and city regions begin to consider how to stimulate economic recovery following the COVID-19 pandemic and lockdown. Local area energy plans could also play a vital role in the UK meeting its target of achieving net zero carbon emissions by 2050. Citizens Advice would like to see the Government take action to ensure that these plans put energy consumers at their heart, so people can benefit from locally-tailored approaches to the energy transition. As a competitive market that has traditionally been strategically managed and planned at the national level, a move to more local energy decision-making is significant. We want to see it put consumers in a better place - whether that's in relation to customer experience, consumer protections or costs.

3.22 A national framework for local area energy could help ensure that plans are achievable, affordable and effective. Central government needs to make sure that plans are efficient, that people are protected and to be confident that the sum of many local plans delivers net zero carbon emissions nationally. This in turn could give people the confidence to engage with local energy projects. Local area energy should build on local diversity whilst being supported by a national framework that ensures fair access for all energy consumers.

3.23 As more local areas consider how they may develop or deliver a local energy plan, there needs to be an agreed baseline of consumer protections, standards of service and complaints procedures that all local projects sign up to. As energy is an essential service, these should include specific support and options for people in vulnerable circumstances. Local area energy plans also need to build in effective external scrutiny, to ensure consumers are getting value for money.

#### **4. What are the barriers to scaling up low carbon heating technologies? What is needed to overcome these barriers?**

3.24 The overarching barrier to scaling up low carbon heating technologies is the lack of public-facing narrative on net zero; what it is and how it will impact people in their homes.

3.25 Delivery of the net zero emissions target will mean change on an unprecedented scale. All homes, around 29 million, will need to receive low carbon measures. Low carbon heat in particular will need to increase from being in just over 4% of homes to over 90% in the next 30 years<sup>8</sup>. Yet, in the main, people are unaware of this. Citizens Advice believes that a **national public awareness campaign of net zero** is needed and plans should be made to implement this as early as possible.

3.26 Another barrier to scaling up low carbon heating technologies is the availability of enough knowledgeable and trusted low carbon installers. Our research looking at consumer choice and low carbon heating found that many people rely on either trusted brands or installers they know when seeking new or replacement heating systems<sup>9</sup>. To begin rolling out low carbon heating systems on the scale needed will require building up installer capacity and trust in those installers. As discussed earlier, a net zero homes guarantee could help to build up that trust.

3.27 Consumers also need to feel confident that these new systems are adequately supported in terms of consumer protections. The scale of delivery for low carbon heating systems will be unprecedented and the current patchwork of consumer protections that surrounds low carbon measures and technologies is not fit for a net zero future. Citizens Advice believes that a **radical overhaul of consumer protections for low carbon measures** is necessary to avoid potential detriment to all households but especially those that are more vulnerable.

#### **5. How can the costs of decarbonising heat be distributed fairly across consumers, taxpayers, business and government, taking account of the fuel poor and communities affected by the transition? What is the impact of the existing distribution of environmental levies across electricity, gas and fuel bills on drivers for switching to low carbon heating, and should this distribution be reviewed?**

3.28 There are two main ways energy policies can be paid for, when they are socialised: by consumers energy bills and taxes. Of the two, funding through taxes is fairer. Funding through energy bills is regressive: the costs tend to fall disproportionately on the low-income customers. Yet, these are the consumers most in most need of support through decarbonisation policies. A paper, published by the UK Energy Research Council in 2018, found that shifting low carbon levies off bills into general taxation would reduce costs for 70% of UK households, saving the poorest households £102 per year<sup>10</sup>.

#### **Bill funding hits poorer households hardest**

Energy policy costs as a proportion of household income, by decile<sup>11</sup>

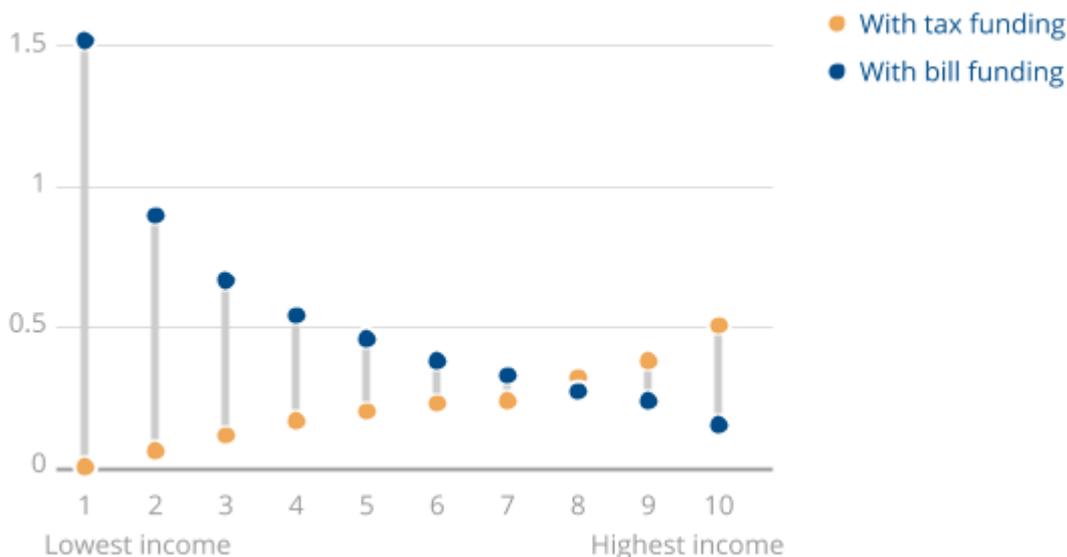
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<sup>8</sup> Committee on Climate Change (2019), [UK Housing: Fit for the future?](#)

<sup>9</sup> Citizens Advice (2020), [Taking the temperature: consumer choice and low carbon heat](#)

<sup>10</sup> UKERC, [Funding a Low Carbon Energy System: A Fairer Approach?](#), March 2018

<sup>11</sup> UKERC, [Funding a Low Carbon Energy System: A Fairer Approach?](#), March 2018



3.29 Funding through taxes also avoids issues associated with funding through electricity bills. At the moment, most of the costs associated with decarbonisation policies are recovered through electricity bills. This hits consumers with electric heating hardest, many of whom are on a low income income. It could also be a disincentive to further electrification of heating.

3.30 The government’s current proposals for a green gas levy would be more regressive than either taxation or funding through energy bills. They propose recovering costs on a flat rate per gas meter, rather than on the basis of energy used. This is intended to avoid the issues associated with funding specifically through energy bills. But this is regressive in two ways. Firstly, it means low income households pay far more as a proportion of their income than they would on a per energy used basis. Secondly, it leads to an unfair distribution of costs between households and businesses, with households paying disproportionately far more. Decarbonisation costs need to be balanced fairly between not just different types of household but also between households and businesses.

**Businesses account for a large portion of gas use<sup>12</sup>**

Businesses represent only 1% of all meters



But account for 37% of annual gas use



3.31 Even relatively small increases in annual energy bills due to regressive funding policies would have significant impacts on those already in fuel poverty struggling to pay bills, and who are regularly self-rationing and self-disconnecting. Our research from 2018 showed that 140,000 people

<sup>12</sup> Citizens Advice, 2020, [Citizens Advice response to BEIS consultation on proposals for a green gas levy](#)

using prepayment meters are ‘self-disconnecting’ each year because they could not afford to top up . Compared to taxation, funding based on either energy bills or on a flat per meter rate, would push more consumers into similar situations<sup>13</sup>.

3.32 The fair distribution of funding depends not only on how it is raised, but also on how it is spent. While strong incentives are often necessary to get consumers to act, if designed badly, they can be wasteful, and provide a windfall to already well-off households. In the initial stages of the Feed-in Tariff, the high payment rate gave households who could afford to invest in solar panels an overly-generous return<sup>41</sup>. Both the Feed-in Tariff and Renewable Heat Incentive required consumers to find the capital to pay for the upfront cost of the installation, and then gave them a regular subsidy in return. This meant they mainly rewarded wealthy householders in larger homes. In the case of the RHI, it meant new heating systems did not necessarily go to those households off the gas grid who could save the most on their bills<sup>14</sup>.

3.33 Grants could have been a better way to fund the FiT and RHI. Not only would they have helped more lower-income households, they would also be simpler, and potentially cheaper, to manage. Recent evidence also suggests that grants are also more cost-effective, over the long-term, than subsidised loans, like the Green Deal<sup>15</sup>.

3.34 Because of all these issues, we recommend that BEIS carry out and publish an analysis of the impact of all its policies on bills, and in terms of costs to consumers more generally, including the distributional impacts.

## **6. What incentives and regulatory measures should be employed to encourage and ensure households take up low carbon heat, and how will these need to vary for different household types?**

3.35 In 2016, Citizens Advice research ‘Energising Homeowners’<sup>16</sup> used behavioural workshops with householders to understand their priorities, how they make decisions about their home and their likely responses to home energy improvements and related incentives. Our research indicated that a package of measures is needed to inspire trust, motivate householders, help them pay for home energy measures, and ensure that work meets high quality standards:

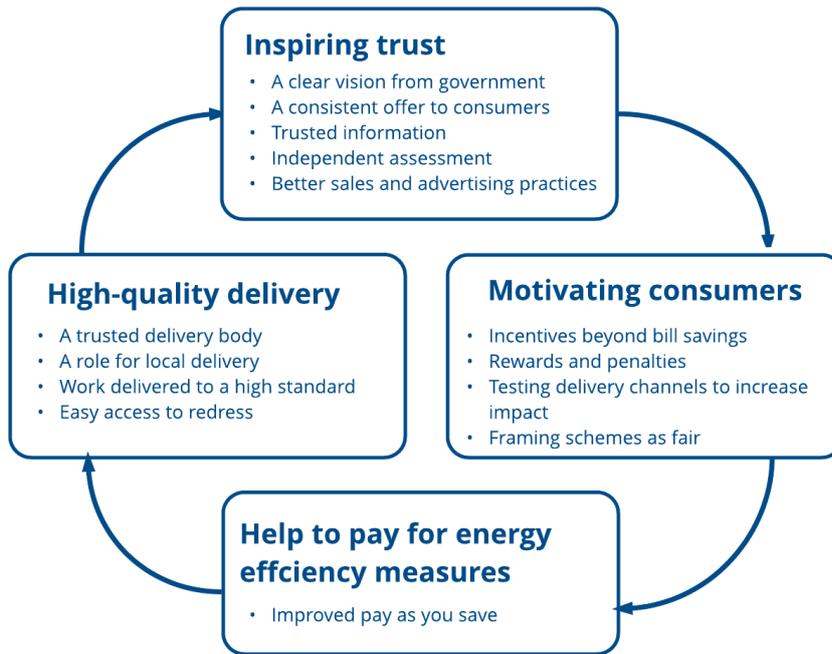
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<sup>13</sup> Citizens Advice, 2020, [Citizens Advice response to BEIS consultation on proposals for a green gas levy](#)

<sup>14</sup> Citizens Advice, 2020, [Lessons for net zero: What past energy efficiency and low carbon home improvement schemes tell us](#)

<sup>15</sup> Citizens Advice, 2020, [Lessons for net zero: What past energy efficiency and low carbon home improvement schemes tell us](#)

<sup>16</sup> Citizens Advice, 2016, [Energising homeowners: Research into consumer decision-making on energy efficiency improvements](#)



3.36 Motivating households will require incentives over and above any benefit provided by bill savings. This is likely to mean a combination of grants - for low-income households and to subsidise higher-cost measures - and regulatory incentives. Loan finance (like the Green Deal) is unlikely on its own to deliver mass uptake of measures. But financial support of this type, at reasonable rates of interest, is likely to be necessary to ensure lower income households are not penalised.

3.37 Research suggests tax-based incentives, like variable council tax, could be most effective at driving action. However, the government should look to use all opportunities to create cost-effective incentives.

3.38 In 2012, the government considered introducing a new scheme, known as consequential improvements, through planning rules. This would have required homeowners to upgrade the energy efficiency of their home if they built an extension or made other significant changes to their property. It had previously been implemented successfully by some individual local councils. However, the UK government decided not to introduce it because of more short-term policy concerns, and the lack of a long-term strategy for carbon reduction<sup>17</sup>.

3.39 Similar issues befell the Zero Carbon Homes policy, which aimed to set high energy standards for new homes being built. As a result of the government decision to abandon the policy in 2015, many new homes continue to be built without measures needed to reach net zero<sup>18</sup>.

3.40 In private rented homes, regulation should be used to drive decarbonisation, as in the current proposals for enhanced minimum energy efficiency standards.

## **7. What action is required to ensure that households are engaged, informed, supported and protected during the transition to low carbon heat, including measures to minimise**

<sup>17</sup> Citizens Advice, 2020, [Lessons for net zero: What past energy efficiency and low carbon home improvement schemes tell us](#)

<sup>18</sup> Citizens Advice, 2020, [Lessons for net zero: What past energy efficiency and low carbon home improvement schemes tell us](#)

## **disruption in homes and to maintain consumer choice?**

3.41 As discussed in our response to question 2, Citizens Advice have called for a ‘net zero homes guarantee’ with a focus on information, protection and support as part of the Government's plans to improve energy efficiency and the transition to low carbon heat.

3.42 Informing consumers is essential if we want people to have a clear understanding of their options, choices and obligations. Government should:

- **Provide a single, comprehensive net zero homes protection framework** for providers and installers of household energy efficiency measures or low carbon heating solutions. People need to know what to expect when energy products or services are installed in their home. There are too many codes: consumers need one, easy to understand system.
- **Ensure that consumers can access high quality independent advice** about what changes they need to make to their homes more efficient or switch to a different heat source. This should include holistic advice tailored to the energy efficiency and low carbon heat needs of individual homes.
- **Deliver a national campaign** (alongside local, community based support) to explain the net zero homes guarantee, and encourage people to engage with making improvements to their home. This should use trusted channels and provide particular support to vulnerable consumers. It should explain to consumers how to identify reputable service providers, and where they can go for independent advice and redress.

3.43 Better, simpler and more coordinated consumer protections in this space will encourage good behaviour by market participants and create a level playing field, whilst also giving people confidence to engage.

- The net zero homes protection scheme must be based on clear and specific objectives with an effective monitoring and audit regime. This will give people confidence that they are accessing reputable and effective suppliers and installers.
- Consumers need guaranteed access to high quality, independent advice about the options available to finance the supply and installation of household energy efficiency measures and green heating solutions.
- Installers of net zero equipment, services and providers of finance should be bound by rigorous, mandatory complaints handling and redress schemes. This will give people confidence that they are protected if things go wrong.

3.44 As suggested in our response to question 2, some consumers will need more support than others to make changes to their homes and to move to using low carbon heat. Government plans for decarbonising heat must recognise that vulnerability is not a static state, and that people's lives change. Vulnerability can come in a range of guises, and can be temporary, sporadic or permanent in nature. Support must be available to ensure that these consumers are not ‘left behind’ during the transition of the heat market.

- Financing and funding solutions that work for all consumers will be essential. This must include the availability of grants for consumers on a low income to ensure they are not left behind.
- Incentives should be used to encourage homeowners to install energy efficiency measures and low carbon heating solutions. These need to be available to all homes below band C. It should also introduce some penalties:
  - For owner-occupiers the government should use financial incentives to encourage

people to make changes, for example through the introduction of lower stamp duty or council tax deductions for installing energy efficiency measures and improving the energy performance certificate rating of a property.

- For private rented properties, the government should increase the minimum energy efficiency standard to a Energy Performance Certificate rating of C, between now and 2030, and raise the cost cap to a level that means that the vast majority of private rented properties will reach this rating .
- Any penalties should only be introduced when property owners have been given appropriate information, financial support and time to make changes to their property.

## **8. Where should responsibility lie for the governance, coordination and delivery of low carbon heating? What will these organisations need in order to deliver such responsibilities?**

3.45 The governance, coordination, regulation and delivery of low carbon heat should all be considered in the context of other changes to the energy market: namely the impact of smart, data driven energy technologies, and the ‘low regrets’ investments in improving energy efficiency.

3.46 There will be an expectation on people to engage with all of the changes to the way they use and interact with energy in their homes. People will have to change the way they use energy in their homes, and this will means three things:

- Making homes more efficient so they use less in the first place
- Using technology and smart energy products, and services, to better manage the way we use energy. This will mean multiple companies interacting with and sharing energy usage data, more bundled products and services and paying different prices at different times of day.
- Moving to low carbon heat options - Over 90% of homes will need to have low carbon heating systems installed by 2050, up from just 4.5% today<sup>19</sup>.

3.47 The governments Heat and Buildings Strategy should be closely aligned with plans across other government departments, specifically with the Ministry for Housing, Communities and Local Government. It will be vital to ensure that there is a national framework for local area energy plans, to ensure that they are robust, with strong governance and accountability. They should also have a clear consumer engagement strategy, as well as clearly defined provisions for information, protection and support.

3.48 Currently, some forms of consumer protections are enshrined in law and range from general protections (for example, the Consumer Rights Act) to sectoral protections (for example, supplier licence conditions). Regulated energy companies have to have a supply licence to operate. However, the fast changing nature of the market means that lots of the new business models in energy fall through the gaps and don’t give people clear information or help when things go wrong, nor do they ensure companies support people in vulnerable circumstances.

3.49 Citizens Advice is calling for a ‘net zero regulation challenge’<sup>20</sup> and wants the government and regulators to work together to create a net zero ‘consumer protection promise’. Such a promise

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<sup>19</sup> Committee on Climate Change (2019), [UK Housing: Fit for the future?](#)

<sup>20</sup> Citizens Advice (2020), [Zero Sum](#)

should ensure:

- Consumer protections can evolve and adapt as the market, products and services change
- Suitable support (including independent advice and redress) is available for people buying energy in different ways
- People are protected and confident that regulators will take action in the event of a company failure, regardless of which market it happens in

3.50 Companies providing energy products, services or supplies must be required to make information about products and services transparent and accessible. This will be crucial to give consumers the confidence to engage with (and change) the way they use energy.

## 4. Recommendations

4.1 Based on our extensive research and work with consumers directly, Citizens Advice believes that the following is needed to deliver the net zero emissions target in a fair and just way that will support consumer and industry:

- A **national awareness campaign** on the need for net zero and what it means for us all.
- A **national framework for delivery** that allows local organisations to collaborate on the delivery of the net zero emissions target.
- A **radical overhaul of the consumer protections** that cover the contracting, installation and operation of low-carbon heating systems - including a Net Zero Homes Guarantee.

4.2 All of the above must be designed with the variety of people and homes in mind. Particular regard must be given to people in vulnerable circumstances and the issue of fuel poverty. As we are about to enter what could be our most difficult winter period as a result of Covid-19 this has never been more important.

*November 2020*