

Revised Energy Poverty Action Plan: Citizens Information Board (CIB) Response to the Department of the Environment, Climate and Communications Survey

Targeted Questions for Individuals/Households

1. What new measures could we introduce to support households in, or at risk of, energy poverty?
2. What existing measures could we improve or update to support households in, or at risk of, energy poverty?
3. What measures could we take to encourage customers to engage with their suppliers early on, to reduce the possibility of disconnection and energy debt increasing?
4. How can we more effectively promote supports for customers in or at risk of energy poverty (e.g. vulnerable customer registration, nominated representatives, level-pay plans)?
5. How can we more effectively promote price comparison options and information for customers, so they can obtain the cheapest energy prices to meet their needs (e.g. Price Comparison Websites)?

A considerable proportion of users of Citizens Information Board (CIB) funded services, (Citizens Information Services (CISs) and MABS are welfare dependent and at the lower end of the socio-economic scale, in low paid or more precarious employment, and a number have disability related concerns. CISs and MABS¹ repeatedly highlight the fact that, while high fuel prices and related heating costs affect everyone, low-income households fare worst because a higher percentage of their disposable income is required for this purpose. Relative to higher-income households, lower-income households spend a greater share of their income on energy and food, and less on goods and services. MABS have seen an increased presentation of clients with utility debts experiencing unaffordable energy costs. This clearly indicates a need for a more integrated, multi-dimensional approach to energy poverty that includes stronger regulation and action on energy prices, targeted financial support to relevant households and the expansion of energy efficiency schemes across all households, both owner-occupied homes and those

¹ MABS are making a separate submission to this consultation based on their in-depth casework with clients who face difficulties meeting rising energy costs and the knock-on impacts on household budgets and indebtedness.

living in the private and public rented sectors. In addition, supports for low-income households need to include easy access to income support, including Supplementary Welfare Allowance safety net supports, where no other social welfare payment is immediately accessible.

Citizens Information Services deal with considerable query levels relating to fuel and energy costs and related support schemes. In 2023, for example, under the category of social welfare, there were 27,465 queries to Citizens Information Services about the Fuel Allowance, and almost 33,000 in 2022. In addition, queries have been recorded for the Household Benefits Package which assists with the cost of electricity or gas bills: 17,584 in 2023 and 19,444 queries in 2022.

The experience of CIB-funded services shows that some groups of people are more vulnerable to energy poverty than others, including, in particular:

- People living in older build houses
- People living in rental accommodation.
- Traveller communities
- Older people
- People living in low-income households.
- People who are over-indebted
- Lone-parent families
- Disabled people

Many in these groups may already be at a social disadvantage and are likely to be living in houses with low energy efficiency or unable to keep up with rising energy prices or rent. It is important that any measures taken to combat energy poverty or to support households to move away from fossil fuels take the needs and experiences of these groups into account.

While the increases in the Fuel Allowance that were provided in response to the cost-of-living increases have been important and timely, (changes to income thresholds, and once off payments in Budget 2023 and Budget 2024), these measures have just maintained the value of the Fuel Allowance relative to home energy inflation in recent years. One-off measures, while welcome in the short-term, are insufficient to deal with the complex and multi-faceted reality of energy poverty, including, in particular, the intrinsic link between energy poverty and household income and the wide range of levels of energy efficiency within homes.

The qualifying conditions for the Fuel Allowance, while extended, still exclude some people who might reasonably be expected to be able to avail of the Allowance. There is, therefore, a strong argument from a social inclusion and equality perspective that qualification for support for energy costs should always be based on household circumstances, income, and BER ratings. Rather than on receipt of a particular qualifying social welfare payment, or the duration of time on a payment, or the conditions in relation to living alone or only with certain individuals who meet particular conditions. The additional heating costs

associated with some types of disability are significant and need to be fully acknowledged and addressed from a social inclusion perspective.

There is a heightened risk of energy poverty for Traveller families living in mobile homes/trailers and particularly for those living on unauthorised sites including at the roadside, with energy costs overall being considerably higher than for the general population.² This is an area which requires special attention.

Clearly people who stay at home for extended periods (for whatever reason/s) have greater challenges in keeping warm than households in the general population where, from Monday to Friday, all the adults go out to work and all the children go to school. The group includes many disabled people, some people who are retired from work and households where a parent stays at home to look after younger children. When developing the new energy plan, it would be beneficial that this is factored in – which has tended not to have happened to date.

Since transitioning towards renewable energy and away from fossil fuels is key to achieving Ireland's climate goal of reaching net zero emissions by 2050, renewable energy must be made more affordable and attractive to encourage people to choose renewable energy sources for heating, fuel, and electricity over fossil fuels.

6. Would you be willing to share your personal experience in dealing with energy poverty/high energy costs?

Citizens Information Services compile Social Policy Returns (SPRs) on issues experienced by clients in accessing services and supports necessary for daily living. An SPR is recorded when staff identify a policy issue that is frequently encountered or where it is deemed that the issue is one that impacts in a serious manner on clients. These SPRs are analysed by CIB in the context of providing social policy feedback to Government.

MABS also has extensive experience and relating to people experiencing energy poverty.

Implementation of Legal Framework

Energy poverty has been defined at the EU level, identifying low income, low energy efficiency and high energy expenditures as the main factors. What other factors would you include in a national definition?

Which of these do you think is the most important to include in a national definition?

CIB is of the view that there is value in considering additional factors for inclusion in definitions such as: the proportion of particular at-risk/vulnerable households having arrears on utility bills; the proportion of the population living in sub-standard housing; qualitative and quantitative measures of the actual degree, nature, severity and extent of energy poverty as experienced by households – for example, the frequency of households experiencing a need to reduce or ration heating to a level that is below an optimal level or

²https://www.citizensinformationboard.ie/downloads/social_policy/MABS_Energy_Poverty_Report_2019.pdf

impacts negatively on people's health or well-being; the extent and proportion of households that frequently or regularly self-disconnect from their energy supply.

Meeting the Cost of Energy

[What barriers do you believe are preventing customers from accessing affordable and reliable energy services?](#)

Despite the provision of energy-directed financial supports, a significant proportion of households continue to experience levels of financial challenge in accessing affordable and reliable energy services. Issues concerning eligibility for Fuel Allowance and other supports are areas of concern for many Citizens Information Services (CISs) and MABS clients. Restrictions and conditions connected to welfare payments (not directly linked to energy) can impact the ability of households to meet a wide range of living costs, including but not restricted to energy access.

Queries to CISs and the experience of MABS clients indicate that, despite the rolling out of campaigns aimed at informing people of the supports and schemes that are available, many households remain unaware or unclear about their rights and entitlements as consumers or the steps they should take when they find themselves in financial difficulties with energy suppliers.

[Which groups do you consider have not received enough support, up to now?](#)

Particular marginalised groups such as members of the Traveller community, older persons, single adult older person households, single parents and disabled persons are at an increased risk of energy poverty. SILC 2023³ data shows that while 5.4% of households generally had arrears on utility bills⁴ twice or more in the year, there were much higher percentages among particular households – 14.1% for lone parent households with children under 18; 11% for other households with children under 18; and 9.6% for households with one person over 65.

There is a need to recognise the fact that particular groups – such as older people and people with certain disabilities – have a substantially higher dependency on heat in their homes as a result of their situation or condition. It will be important that the specific and particular needs of these groups be addressed in the revised energy poverty action plan.

CIB-funded services also note the continued challenges experienced by persons in rented accommodation, by pay-as-you-go energy customers, and by people on low and fixed incomes. Household utility bill difficulties and debt are bringing many people to CISs and MABS. These clients are often struggling to find a way to pay their bills and cover everyday expenses in addition to attempting to service debts. Households struggling to pay heating and electricity bills are also struggling to cover other essential living costs, including food. CISs are experiencing a significant number of queries relating to fuel and energy support

³ [Survey on Income and Living Conditions \(SILC\) 2023 - Central Statistics Office](#)

⁴ Utility Bills may also refer to telephone and TV as well as to energy bills.

subsidies, as well as enquires relating to additional needs payments under the Supplementary Welfare Allowance Scheme.

[In the areas of energy prices, meeting the cost of energy and consumer protection, what further actions do you think could be taken to alleviate energy poverty? Please provide any relevant analysis or research to support your suggestions.](#)

There is, we believe, an argument for an overall reduction in standing charges – even as a temporary measure. These charges serve as a flat-rate fee regardless of energy use or composition of the household or household income.

An onus should be placed on energy suppliers to firstly identify and then extend their lowest tariff to all households that are experiencing difficulty.

There would be merit in exploring the introduction of a national price cap placed on the maximum price for a unit of gas and electricity, as has been introduced in the UK.⁵

Many rural households continue to rely on oil-fired systems or solid fuel stoves for heating. In order to meet the needs of these households over the winter months, and, pending the provision of better supports for retrofitting, there is a need for a more targeted approach which takes into account the location and physical structure of houses.

Households in arrears can experience great difficulty in moving to more competitive suppliers and tariffs. Debt flagging policies need to be reviewed with a view to allowing and enabling all households to move to lower tariffs for defined periods.

CIB is aware of the particular and general difficulties being experienced by households living in private rental accommodation. It has been noted that in the private rented sector, low-income households often live in lower quality accommodation, and have neither the means nor the incentive to invest in energy efficiency.⁶ It will be important that effective approaches are put in place aimed at ensuring that energy poverty is minimised for this growing population. Renters are generally restricted in how they purchase their energy supplies. Landlords with tenants in receipt of HAP should be obligated to offer a PAYG (Pay as You Go) meter at the outset of any new tenancy or on the request of a tenant during the duration of an existing tenancy.

A significant cohort of vulnerable people continue to operate in a cash economy. Provisions should be in place to protect those who use cash payments for home energy costs (including pre-pay meters), and they should not face additional fees or charges from suppliers for paying their bills in cash.

[What gaps do you see in the current Energy Poverty Action Plan? How could we address those gaps in a revised Action Plan?](#)

⁵ [Energy Price Cap Explained – Forbes Advisor UK](#)

⁶ [Energy Poverty in Ireland \(oireachtas.ie\)](#)

CIB is of the view that the structure, objectives, and measures outlined in the current plan constitute a desirable approach to the challenge of energy poverty in Ireland.

The revised plan should confirm an all-of-government approach to the issue, recognising the complex energy challenges faced by many people and households. Research, analysis and innovation should be an integral part of implementation, as should continuing and stronger cooperation and partnership with organisations and agencies that are closest to disadvantaged sections of the population.

[Are there specific programs or initiatives from other countries that you think could be effective in reducing energy poverty in Ireland?](#)

While CIB has no in-depth knowledge of approaches from other countries, we are aware that some EU member states have introduced alternative policy measures, many in the form of social energy tariffs, to support vulnerable households to meet their energy bills. Other alternative approaches referred to in recent research⁷ by the Vincentian MESL Research Centre include systems that ‘guarantee’ access to essential energy at a low cost. Generally, these reduced tariffs provide a reduction in overall bills and are within defined ceilings of consumption for qualifying households. In Spain, for example, there is a social discount rate for electricity, and the proportion of discount a household is eligible for is based on consumer category, defined by household income. There is a consumption limit on the amount of energy entitled to a discount, meaning the consumer must pay the standard price per unit if its energy usage exceeds the defined threshold.

In the UK, the New Economics Foundation proposes a ‘National Energy Guarantee,’⁸ a scheme that would reduce the price paid by households to help households meet their energy needs. The scheme offers a range of allowances, primarily designed to protect households’ minimum energy needs by pricing them at a low cost, while other ‘premium tariffs’ are targeted towards wealthier households with a higher level of consumption and aims to act as an incentive to retrofit the home.

Age Action have proposed an Energy Guarantee⁹ for older persons as a long-term solution to increasing energy prices. The proposed Energy Guarantee would grant a higher level of support to those households on lower incomes and with lower BER ratings. CIB believes that this approach should be given consideration by Government.

[How can smart energy solutions be integrated into the Energy Poverty Action Plan in a way which supports sustainability and environmental considerations?](#)

CIB believes that smart energy solutions involving a range of approaches and technologies will only succeed if people are convinced that these solutions will bring clear benefits and would save money for their households, as opposed to the solutions being viewed as marketing ploys on the part of technology suppliers. Clear and well-structured delivery of information as well as effective signposting will be essential in the promotion of smart energy solutions.

⁷ [The cost of adequately heating the home \(budgeting.ie\)](#)

⁸ [Energy Price Cap Explained – Forbes Advisor UK](#)

⁹ https://www.ageaction.ie/sites/default/files/age_action_energy_guarantee_for_older_persons.pdf

Utilisation of smart energy solutions in local authority and social housing units could be used as a demonstration model for the feasibility and effectiveness of smart solutions. This could be enabled by providing local authorities with the necessary resources to retrofit all local authority properties over a defined period of time.

Exploration of micro-grid and decentralised options for energy generation and distribution is likely to have a greater potential for engagement and buy-in at a local level, combatting resistance and reluctance to new developments. In urban areas, district heating systems also offer opportunities for engagement, sustainability, and improved environmental results, while simultaneously combatting energy poverty.

The experience of CISs is that many people find navigating application processes for grant-aid to be daunting and off-putting. Home energy upgrades would be more likely to be taken up and new technologies adopted by people, especially those who are already in or are facing energy poverty, through a direct engagement between the SEAI and suppliers. The success to date of the SEAI's One Stop Shop service is indicative of the direction that is likely to deliver best results. This will be especially true in dealing with the challenges involved in catering for households in older dwellings that still use fossil fuels as their primary heat source and many of which are living on low income.

Continued attention will need to be made in assessing and simplifying the various grants application processes. There is clearly a need for additional grant assistance for smart energy and related retrofitting to be specifically targeted at low- income households.

Energy Efficiency

[How can renewable energy solutions be integrated into the Energy Poverty Action Plan in a way which supports sustainability and environmental considerations?](#)

Renewable energy solutions should be integrated into the revised plan at a number of levels, ranging from the large-scale macro level of energy generation and usage to the domestic level. CIB recognises that there can be resistance and a lack of readiness on the part of a community to accept new ways of producing, storing, distributing, and using energy, for a variety of reasons.

Community and neighbourhood scale initiatives are likely to achieve greater acceptance and adoption, particularly if local people are involved in the decision-making and ownership structures. Options that are likely to be attractive for individuals and local communities would be those that would clearly reduce energy costs for their own households and enable them to feed self- or community-generated or stored energy into the national grid.

Any properties acquired by local authorities for the provision of social housing should be made energy efficient and have the capability to feed energy back into the grid.

Local authorities and community-based NGOs have the potential to play a crucial role in demonstrating the feasibility, benefits, and advantages of new approaches to energy creation and usage, by providing leadership, examples of best practice and commitment, as well as by mobilising action at a local level. The existing Energy Poverty Action Plan recognised and supported the role of local authorities in delivering

climate and energy policies and behavioural change within their own organisations and with regard to empowering households to better understand and embrace new approaches to energy usage. There is now a need, in a revised plan, to reach out to organisations, groups and agencies at a sub-local authority level. The strengths and influence of community-level organisations should not be underestimated. By their actions, example and voices, this level of mobilisation has the power to influence, guide and assist households into making more sustainable and financially rewarding choices. There is also a need for a convergence of political interests at local level to provide strong leadership for a strong local collaborative approach to developing local sustainable energy solutions.

[Government is acutely aware of the need to balance support available under the Warmer Homes scheme and the waiting times for that support. Do you think the scheme could be adapted in any way to better target the support so we can achieve that balance?](#)

The Warmer Homes Scheme is an essential mechanism for supporting the many households who live in older or sub-standard accommodation. The scheme needs to be adequately resourced in order to speedily deliver results within short timeframes.

Identification of those households most in need of the service and their prioritisation is paramount. Assessment of need and of minimum required standards of support to be delivered should take account of individual circumstances, especially in the case of households comprising older people and those with a disability or serious health condition. Collaboration with health and social care providers, and with local authorities is essential in this regard.

[The Government has put in place several supports for landlords \(including a range of grants, a tax incentive, and the forthcoming home energy upgrade loan scheme\) to upgrade the efficiency of their rented properties. Are there other measures \(acknowledging the challenges facing the housing sector\) that the Government could take that you think would further support upgrades in the private rented sector? Please provide references to any relevant material that would support your response.](#)

CIB is acutely aware of the challenges that exist for people in finding, retaining, and paying for rented accommodation. Our services consistently record large volumes of queries and complaints concerning the private rental sector and we have undertaken collaborative research relating to the vulnerabilities of renting.¹⁰ We also acknowledge the importance of maintaining the stock of rented accommodation and, consequently, the need to encourage landlords to remain in the sector.

CIB suggests that, in order to address the extent and nature of energy poverty that many private sector tenants experience, property owners themselves must be encouraged, enabled, and to a certain degree obliged, to engage with home energy upgrade schemes. As with all other issues involved in the tenant-landlord scenario, there is a need for a practical carrot and stick approach.

Since reluctance to take on upfront costs is likely to act as a barrier for many property owners, one possibility worth exploring would be the provision of fully or substantially funded energy upgrade grants

¹⁰ [Renting and Risk: An analysis of the vulnerabilities of renting - A Threshold and Citizens Information Board Report \(2022\).](#)

for all private property owners without means testing, but with the caveat that the property must be kept on the rental market for at least ten years after availing of the retrofit scheme.

Research

What best practice regarding research on energy poverty (e.g. dissemination, public engagement, mechanisms for continuity) should we consider?

CIB is of the view that research on energy poverty, in order to deliver necessary insights and direction for policy, needs to be designed and undertaken in a manner that identifies and analyses the socio-economic circumstances of those groups in Irish society that are most at risk of energy poverty. Of particular importance would be the need to focus more specifically on the linkages between energy poverty and household income. ESRI research has highlighted the importance of analysing the overlap between income and fuel poverty. While income and fuel poverty are two distinctive problems that require different policy instruments, an ESRI Research Bulletin¹¹ has identified a need to address income and energy efficiency inequalities simultaneously to counteract the regressive effect of carbon taxes in Ireland.

CIB would support the establishment of a long-term cross-governmental approach to drive a robust data gathering initiative and in turn use this information to inform policies to alleviate energy poverty and increase sustainability. This platform should also allow civil society members, NGOs, academics, and other experts to contribute and engage regularly with the development and implementation of research initiatives.

There is a strong argument for research, probably most usefully targeted at groups at risk of energy poverty, that would directly measure a range of indicators that individually and together contribute to energy poverty. It is suggested that this research could take the form of demonstration, monitoring, and evaluation projects in selected households over a period of time.

Besides the Economic Social Research Institute's (ESRI) research programme into Energy Poverty, which generally covers measurement and targeting, what other areas do you think should be investigated/researched?

The approach being adopted by the ESRI is effective in identifying and contextualising the issue of energy poverty. As with all research, the indicators and measuring techniques used will need to be continuously reviewed and improved. In particular, research should continue to explore in depth the severity of energy poverty being experienced in addition to its existence, from a qualitative research perspective, in order that the effectiveness of policies can be assessed, and that additional supports can be targeted appropriately. It is critically important that supports should be informed and targeted based on actual evidence of energy poverty— this is not the case at present.

The ESRI will provide metrics to measure the number of people experiencing energy poverty and the impact of it on them. In your view, what specific indicators will be helpful in monitoring the success of the Energy Poverty Action Plan over time?

¹¹ <https://www.esri.ie/system/files/publications/RB202114.pdf>

Good quality data is already available (mainly through SILC) which identify the numbers experiencing either consistent poverty or relative poverty, the proportion of people not able to afford to keep their home adequately warm, the proportion with arrears on utility bills; the expenditure on energy as a proportion of total household expenditure; the proportions of households with share of energy expenditure in income more than twice the national median or below half the national median. CIB suggests that additional relevant metrics would be categories of housing carrying out energy-related improvements/upgrades/retrofits; performance by Local Authorities and other social housing providers in carrying out energy-related improvements to their housing stock. An overarching research theme, referred to above, is the intrinsic link between income and energy poverty. Monitoring energy poverty levels among low-income households is, therefore, crucial.

The success of the Energy Poverty Action Plan should also be measured by the geographic spread of improvements, reductions in demand for emergency-type and hardship fund financial supports; and by data relating to any linkages between energy poverty and poor health.

Communications and Governance

How can we better communicate our work in the area of Energy Poverty to all stakeholders?

Communications to and with the widest possible audience is essential. Evidence from MABS and CISs continues to show increases in queries and requests for assistance in sourcing energy costs supports despite various public information campaigns. For example, in 2023, there were over 24,000 callers to CISs with queries on the Fuel Allowance and these services responded to 5,461 queries related to home energy grants (SEAI). While there is a growing public awareness in general terms of SEAI schemes and of other relevant supports, there are also significant gaps in knowledge. There is, therefore, a continuing need for robust, innovative transfers of information and guidance to the public.

There is a need to recognise that public information campaigns – even those that are well planned and executed – regularly are unable to effectively reach certain groups of the population. Similarly, there is a need to acknowledge that some segments of the population may not have the resources, skills, knowledge, motivation, and ability to act on the information provided. Indeed, research¹² indicates a strong correlation between financial literacy and fuel poverty, and that the administrative burden associated with accessing energy efficiency retrofit grants represents a substantial barrier for some people.

It will be necessary, therefore, to actively engage multiple intermediary support and community-based organisations in both informing people about options and supporting them in taking appropriate action.

In addition to the role of MABS and CISs, on a practical level, there is a strong case for the extension/establishment of easily accessible and visible local energy advice provision that would support people who are experiencing energy poverty or are in arrears in energy bills or who are uncertain about making decisions about how to proceed with energy efficiency measures.

¹² Tovar Reaños, M., J. Curtis, A. Pillai, and D. Meier (2023). *Fuel poverty and financial literacy: Evidence from Irish home owners.*, ESRI Working Paper 751, Dublin: ESRI, <https://www.esri.ie/publications/fuel-poverty-and-financial-literacy-evidence-from-irish-home-owners>

What suggestions do you have for ensuring the inclusion and representation of diverse voices in the development and implementation of the Energy Poverty Action Plan?

As suggested above, the Energy Poverty Action Plan should continue to proactively engage the widest possible range of organisations and agencies working with population groups at risk (or potentially at risk) of energy poverty.

Both individual organisations and federations/networks of such organisations should be invited and facilitated to participate in developing and implementing the action plan. There are federations/networks at national, regional, county and more local levels that have huge potential for enabling wider participation in the energy debate. CIB believes that the considerable networks funded by and accessible to Pobal, local development partnerships, and other agencies funded by various Government departments have much potential in this regard.

Policy design

In your view, how can we integrate other policies (e.g. housing, energy market regulation, income tax and income support) in our Plan to tackle Energy Poverty?

Addressing energy poverty requires a robust and effective all-of-government approach. It is unlikely, for example, that issues of energy poverty in private rented accommodation will be adequately addressed by a stand-alone energy poverty policy. Equally, issues more directly connected to private rental property standards cannot be addressed without reference to an energy poverty policy.

Energy policy, therefore, must become an integral part of policies relating to housing, social care support, healthcare and, importantly, income (in relation to both social welfare and living wage policies).

The commitment and participation of all government departments and agencies in delivering on energy poverty is vital.

CIB accepts that many aspects of energy poverty, such as wholesale energy prices, will – in the short to medium term – be open to the vagaries of world events. However, energy market regulation should continue to be a national matter and should take account of the fact that energy is now accepted to be an essential service to which everyone has a basic right.¹³

Since energy poverty is almost certainly connected to general poverty and levels of deprivation, ensuring that those parts of the population who survive on minimal incomes are financially enabled and supported to keep their homes warm is essential for social inclusion and a basic citizenship right. Related to this is the need for realistic and targeted grant assistance for low-income households for retrofitting.

¹³ [Transforming our World: The 2030 Agenda for Sustainable Development.: Sustainable Development Knowledge Platform \(un.org\)](#)

Closing Question

Are there any other matters you wish to raise in relation to Energy Poverty?

CIB wishes to acknowledge that national and EU policies have, over recent years, begun to recognise and address energy poverty. Any dramatic rises in energy costs will continue to impact on the most vulnerable sections of the community as well as on sections of the population who were hitherto insulated from the effects of energy costs. However, we are of the view that there should be a particular focus in the new plan on targeted supports for low-income household in the area of retrofitting. Energy poor households have the lowest income levels and have issues with the quality of their housing.¹⁴ While income and fuel poverty are two distinctive problems that require different policy instruments, policies need to address income and energy efficiency inequalities simultaneously.

While a long-term view is important for the revised energy poverty policy, it will also be important that the Government has contingency plans for future possible sudden shocks to the supply and costs of energy.

The Revised Energy Poverty Action Plan must ensure that provision is made for continuing the three broad approaches for tackling energy poverty:

- 1) Reducing demand for energy by improving energy efficiency;
- 2) Income supports in the form of transfer payments (e.g., the Fuel Allowance) and subsidising energy bills – these should include provision for targeted immediate responses to any future price shocks;
- 3) Consumer protection measures including the development of codes of practice and the setting of enforceable customer rights by the independent regulator – the Commission for Regulation of Utilities (CRU)

Finally, CIB would like to reiterate and emphasise the need for a critical and focused approach to educating and informing the public about how they can support themselves about managing energy and how various energy-related policies can ease existing or potential problems. In the case of the latter, however, the Revised Energy Poverty Action Plan must take as its starting point the fact that a ‘one size fits all’ approach to retrofitting does not adequately address the particular needs of low- income families living in accommodation with a low BER rating.

¹⁴ Barrett, M., N. Farrell, and B. Roantree (2022). *Energy poverty and deprivation in Ireland*, ESRI Research Series 144, Dublin: ESRI, <https://doi.org/10.26504/rs144>