



**Association for the
Conservation of Energy**

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**H.M. TREASURY AND DEFRA CONSULTATION:
“ECONOMIC INSTRUMENTS TO IMPROVE HOUSEHOLD ENERGY
EFFICIENCY”**

Response by the Association for the Conservation of Energy

Introduction

The Association for the Conservation of Energy is a lobbying, campaigning and policy research organisation, and has worked in the field of energy efficiency since 1981. Our lobbying and campaigning work represents the interests of our membership: major manufacturers and distributors of energy saving equipment in the United Kingdom. Our policy research is funded independently, and is focused on four key themes: policies and programmes to encourage increased energy efficiency; the environmental benefits of increased energy efficiency; the social impacts of energy use and of investment in energy efficiency measures; and organisational roles in the process of implementing energy efficiency policy.

We very much welcome the opportunity to submit this response to the consultation. It is supported by, inter alia, 108 local authorities, 47 Energy Efficiency Advice Centres, 77 Members of Parliament and many other organisations. These supporting organisations and individuals have, we believe, a unique breadth of relevant experience – and they have provided a wealth of expert opinion and evidence, to which we shall refer in detail below. A full list of supporting organisations and individuals is attached as Annex 1.

General Comments

In response to the first consultation on this issue (16 July-8 October 2002), the Association for the Conservation of Energy compiled a list of the 12 economic instruments and other measures – the “*Clean Dozen*” – that we considered would be most effective in improving household energy efficiency [attached as Annex 2]. The “*Clean Dozen*” was supported by over 200 organisations and individuals – including Members of Parliament, local authorities, NGOs, energy efficiency practitioners and relevant trade associations.

We were pleased that the Summary of Responses to the first consultation referred in considerable detail to the “*Clean Dozen*.” It was appended to the Summary document as Annex C.

We hoped that the Treasury would act swiftly to implement in Budget 2003 some of the measures listed in the “*Clean Dozen*”, and we were most disappointed when this did not happen. We were also disappointed that it took until this August for the current consultation – first announced in the Budget 2003 report “*Building a Britain of Economic Strength and Social Justice*” – to come to fruition. Nevertheless, we were pleased that all of the three measures shortlisted in the current consultation as being “*the most viable*” were derived from the “*Clean Dozen*”. These were:

- a reduced rate of VAT to 5% for the supply and installation of energy efficient products or materials in non-grant schemes when householders employ contractors;
- capital allowances and 100% first year enhanced capital allowances for companies, e.g. Energy Service Providers, who invest in energy-saving equipment to lease to social landlords and households;
- a “domestic business tax allowance”, allowing private landlords to claim investment in energy-saving materials against profits.

We shall discuss below each of these measures in turn, citing expert opinion and evidence as to their potential effectiveness. In addition, we believe that two further measures – included in the “*Clean Dozen*,” but prematurely rejected in the current consultation – should be given serious further consideration by the Government. Again, we shall discuss these measures in more detail below. They are:

- a stamp duty rebate for house purchasers who make energy efficiency improvements to their home within, say, six months to a year;
- a tax allowance for companies training installers of energy-saving equipment.

1. *Reduced rate of VAT to 5% for the supply and installation of energy efficient products or materials in non-grant schemes when householders employ contractors*

There is already, of course, a limited VAT reduction on certain energy-saving materials (insulation materials, draught stripping, hot water and central heating controls) used in non-grant schemes installed by contractors. The case for reducing VAT on energy-saving materials is therefore well made, and we do not believe that it is necessary to make that case again.

However, we believe that there is no good or logical reason for not extending the limited existing reduction to include energy efficient central heating and hot water systems. In the past the Treasury has justified limiting the reduction on the basis that its policy is to provide VAT relief on the installation of materials whose “*primary purpose is to save energy*”. However, there is a glaring inconsistency in the existing reduction, in that *solar* water heating is already covered. We believe that it is therefore now imperative to extend the current reduction to include *all* energy efficient central heating and hot water systems.

Expert opinion and evidence as to potential effectiveness

- **Kirklees, Calderdale & Wakefield EEAC:** “*As an Energy Efficiency Advice Centre/Save II Agency, we offered to customers a cash-back as an incentive to install energy efficient boilers, bringing the cost in line with that of a standard (not so energy efficient) boiler. The scheme was extremely successful, realising a CO2 reduction of approximately 6,720 tonnes (over*

the lifetime of the boilers) in the 2 years that the scheme was able to offer this discount. Since then the cash-back has been reduced and measures have dropped significantly. This I see as evidence that a reduction of VAT on energy efficient products (especially where it brings them down to the cost of a not so energy efficient product) would have a positive effect on improving household energy efficiency.”

- **Northumbria EEAC:** “In our experience as an Energy Efficiency Advice Centre of ten years’ standing, any measures that make energy efficiency measures more financially attractive will be of benefit.”
- **Solent EEAC:** “We get complaints from the public that the reduced VAT does not currently apply to energy efficient boilers.”
- **Thames Valley EEAC:** “We manage the Big Green Boiler Scheme and supply over 10,000 A-rated boilers per annum. However, householders are often surprised that there is no reduced rate of VAT on such installations to reward their endeavours.”
- **West Sussex EEAC:** “A major barrier which stops people investing in energy efficient heating systems is cost. A reduction in VAT would significantly encourage the purchase of these systems by significantly reducing their cost.”
- **Eastleigh Borough Council:** “We have a Green Energy Fund set up this year to pump-prime community energy projects. These projects would be particularly helped by a reduced rate of VAT for the supply and installation of energy efficient products.”
- **Glasgow City Council:** “We have for some time noted the reluctance of some to invest in certain energy-saving products on the basis of cost. In particular there has been a reluctance by householders to install the most efficient boilers on the basis of cost. A reduction in VAT on the most energy-efficient boilers would help reduce cost differentials and make these products more attractive to install.”
- **Leicester City Council:** “Reducing VAT on energy efficient goods and materials has been shown to increase take-up.”
- **London Borough of Lewisham:** “An incentive encouraging consumers to purchase only those products that are the most efficient could help remove inefficient appliances from the market. A reduction in the price differential between efficient and inefficient appliances should induce customers to buy the most efficient products. The introduction of an incentive such as a reduced rate of VAT on an efficient boiler/micro-CHP could help to close the price gap between these products. A smaller price differential could give the potential incentive required for consumers or installers to opt for a more efficient product.”
- **Northampton Borough Council:** “The current limited VAT reduction on certain materials should be extended, particularly to energy efficient central heating and hot water heating. Our experience is that the higher initial cost of condensing boilers is still preventing many households from purchasing them. In addition the most efficient appliances should have a reduced rate to encourage purchase of these over less efficient products and may encourage manufacturers to further develop high efficiency goods.”
- **North Shropshire District Council:** “Many elderly residents in North Shropshire and other householders are on low income, making energy efficiency improvements unaffordable or barely affordable. The reduction in VAT would help them achieve essential energy efficiency improvements, thereby improving their quality of life and reducing the incidence of ill-health through damp and poorly heated property.”

- **Wakefield Metropolitan District Council:** *“We particularly welcome the reduction in VAT on energy efficiency products in non-grant situations, as this will help to stimulate the fuel-rich sectors to install measures.”*
- **Beat the Cold, Stoke-on-Trent:** *“A VAT reduction would make the funds in our SRB project go further and encourage warmer, healthier homes for vulnerable clients.”*
- **Glass and Glazing Federation:** *“Note the example of a retailer that promoted thermal insulation glass products as VAT free (i.e. with a 17.5% price reduction). This led to a 120% increase in sales. There should be VAT and tax relief and stamp duty rebate on all energy efficient products.”*
- **The Lighting Federation:** *“We have been involved in energy efficiency schemes for 10 years. Experience shows that the closer we can get the cost of efficient products to the cost of standard products, the more successful the scheme. The VAT reduction would help achieve this.”*
- **National Housing Federation:** *“Consumers make purchase decisions based on the cost and style of the appliance first, so there is potential for a VAT reduction to have an influence on consumer behavioural change.”*
- **Early Day Motion 79, 13 November 2002:** This EDM has been signed by 249 MPs. It calls for a reduction in VAT to 5% for the supply and installation of energy-saving materials.

2. Capital allowances and 100% first year enhanced capital allowances for companies, e.g. Energy Service Providers, who invest in energy-saving equipment to lease to social landlords and households

The consultation quite rightly identified that one of the barriers preventing the take-up of new, innovative high efficiency equipment is the high initial capital costs involved. Capital allowances are currently available for the Affordable Warmth Programme and for non-domestic Energy Service Providers, so the precedent already exists for extending the capital allowances system.

Expert opinion and evidence as to potential effectiveness

- **Leicester City Council:** *“Social landlords should gain assistance from companies who can lease energy efficient products and claim back capital allowances.”*
- **London Borough of Tower Hamlets:** *“This scheme is useful for social landlords, particularly where an Energy Services Company may be contracted to provide the facility.”*
- **Beat the Cold, Stoke-on-Trent:** *“We see regular demand for such a scheme in North Staffordshire, where a pilot project will run better with allowances like these.”*
- **Energy Conservation & Solar Centre:** *“We particularly welcome the 100% capital allowances to encourage social landlords.”*
- **Energy Systems Trade Association:** *“The availability of 100% capital allowances has had a significant effect on energy service companies (increasingly using approved equipment) and on the efforts of equipment providers to develop and promote equipment that meets the higher energy efficiency standards required to be approved for the energy technology list.”*
- **Early Day Motion 367, 12 December 2002:** This EDM has been signed by 213 MPs. It calls for the existing capital allowances system to be extended to include all domestic sector Energy Service Providers supplying suitably accredited energy-saving measures for lease.

3. A “domestic business tax allowance”, allowing private landlords to claim investment in energy-saving materials against profits

Again, the consultation rightly highlighted the fact that there is currently little incentive in the private rented sector for either landlord or tenant to improve energy efficiency. Landlords can already claim a tax allowance when replacing household materials (not just energy-saving materials). On the other hand, the installation of materials that improve the property is not tax allowable – as it is defined as “betterment”. However, the definition of “replacement” has recently been revised, so that double glazing can now be classed as “replacement” and is therefore tax allowable. This means that the precedent now exists for extending the definition of “replacement” to include the installation of all energy-saving materials. There is no doubt that a “domestic business tax allowance” would give landlords a big incentive to improve the energy efficiency of their housing stock.

Expert opinion and evidence as to potential effectiveness

- **Northumbria EEAC:** *“A domestic business tax allowance will be of great help with private landlords – a large stumbling-block to energy efficiency improvements.”*
- **Brighton and Hove City Council:** *“Our experience has shown that, in the private rented sector, landlords do not have any real incentives to improve the energy efficiency of their properties. The proposed tax allowances for landlords should provide enough incentive for some landlords to take positive action.”*
- **Carrick District Council:** *“Any incentive to encourage private sector landlords to improve their property must be applauded. The landlord’s tax allowance linked to a VAT reduction is a positive move.”*
- **Ceredigion County Council:** *“The private rented sector of housing is generally recognised as one of the sectors with the least energy efficient housing stocks. Therefore any incentives for both landlords and tenants to improve this situation would be greatly welcomed, as at present there is little or no incentive to improve this situation – and, as an authority who is involved with improvement and enforcement, the more “carrots” that are available the better, as there are no “sticks” relevant to this area.”*
- **East Devon District Council:** *“We particularly support the domestic business tax allowance. This is because our experience in East Devon would indicate that private landlords in particular need some incentive to improve properties to even the minimum standards that many Council tenants enjoy, and to move the private housing stock towards the Home Energy Conservation Act target of a 30% improvement in energy efficiency.”*
- **East Hampshire District Council:** *“We particularly support this measure, as it is aimed at private landlords. Recent stock condition surveys have shown that the private rented sector is the most energy inefficient.”*
- **Kerrier District Council:** *“The landlord’s tax allowance is very important as a much-needed incentive to landlords.”*
- **John Davis, Manager of an EEAC:** *“This allowance would target the very difficult private rented market. From personal experience – and recent market research undertaken for an emerging project, I know that this market is entirely motivated by financial considerations. There is no incentive whatever at present for a private landlord to invest in energy efficiency nor to facilitate the adoption of Warm Front measures for qualifying tenants. A financial incentive is the only way to get any movement in this market*

- **Kent Local Authority Support Programme:** *“The domestic business tax allowance will be of great use in the hard-to-reach sector – private rented housing. All Kent local authorities have requested solutions to privately rented housing inefficiencies.”*
- The **National Federation of Residential Landlords** represents the very people whose behaviour and product choices this measure is designed to affect. Their view is unequivocal – that all the shortlisted measures, in particular the VAT reduction and landlord’s tax allowance, are just the kind of fiscal levers that will encourage their members to improve their properties and so provide the better accommodation that they all wish to see.
- **National Housing Federation:** *“This could have the benefit of targeting the private rented sector – one of the most difficult parts of the housing sector to influence.”*
- **Severn Wye Energy Agency:** *“Incentives for landlords such as this tax allowance are desperately needed.”*
- **South West HECA Forum:** *“The limited success in many areas to target private landlords and the energy efficiency of their properties highlights the need for a more robust method of persuading the property owners to improve energy efficiency. This will benefit the tenants a great deal and target a neglected area of private housing for energy efficiency improvements.”*

4. A stamp duty rebate for house purchasers who make energy efficiency improvements to their home within, say, six months to a year

This measure was proposed in the “Clean Dozen” last year – at the specific request of a large number of energy efficiency practitioners and representatives of industry. We were therefore very disappointed when it was dismissed, rather summarily, in the current consultation in terms that it “*would be administratively complex and would also give weak signals*”. It is a moot point as to how complex such a measure would be to administer, but it is surely quite wrong to say that it would give a “weak signal”. We believe that it would, on the contrary, send a very strong signal to house purchasers at the time when they are most likely to make improvements to their home. A PhD thesis by Rosie Parnell under Professor Smith of Sheffield University (“*Evaluating the Effectiveness of the Home Energy Report*,” September 2001) concluded overwhelmingly, on the evidence of the Bristol experiment by Ekins Surveyors in providing home energy reports with homebuyer surveys, that the time of purchase is the time when home owners are most likely to make energy efficiency improvements to their property.

Expert opinion and evidence as to potential effectiveness

- **Northumbria EEAC:** *“A stamp duty rebate will help with the problems of the owner-occupied sector.”*
- **Solent EEAC:** *“A stamp duty rebate will fit in well with the energy rating certificates required when houses are sold, due in legislation next year.”*
- **Thames Valley EEAC:** *“Stamp duty rebates would align extremely well with proposed house-buying reforms.”*
- **Carrick District Council:** *“A reduction in stamp duty or rebate after the sale must be a huge incentive for occupiers to consider larger capital expenditure improvements, as the amount would have been budgeted for.”*

- **Doncaster Metropolitan Borough Council:** *“A stamp duty rebate could form part of the “sellers pack”. It would improve SAP ratings and help achieve carbon savings.”*
- **Leicester City Council:** *“In the domestic sector, house buyers should gain a benefit if they improve the energy efficiency of their new property. This could be done by linking it to the energy rating of the property and by stamp duty rebate.”*
- **London Borough of Lewisham:** *“The stamp duty rebate would be a very effective method of introducing energy efficiency. It would need to be linked to specific measures, such as condensing boiler installation, controls, cavity wall insulation, loft insulation, draughtproofing, solar water heating. It could be operated as a rebate against bills submitted, up to standard costs for each type of measure, with a maximum claim of the value of the stamp duty paid, installed within 6 months of moving house.”*
- **London Borough of Tower Hamlets:** *“The primary take-up of such a scheme is likely to be in larger 1930s-1950s properties with unfilled cavity walls and households with some spare cash for home improvements after moving. It would be worth linking the promotion of this scheme with the proposed “sellers pack” and energy labelling of properties, so that consumers also see an enhancement of their property value.”*
- **Northampton Borough Council:** *“Our experience shows that many new homeowners contact the Council for advice concerning their new homes (for grants, etc.), as they often have a number of improvements to make. Energy efficiency improvements are not always their priority and they would be encouraged to install such measures with this type of incentive.”*
- **Swale Borough Council:** *“This measure would assist first-time buyers.”*
- **John Davis, Manager of an EEAC:** *“Householders are far more willing to make improvements to a house just after moving in. It is a critical time for encouraging the adoption of energy efficiency measures before shortcomings become accepted and the drive to stamp the new owner’s identity on the property has waned. A rebate on stamp duty would encourage householders to look at the opportunities to improve energy efficiency and give a time-limited opportunity for action.”*
- **Early Day Motion 49, 28 June 2001:** This EDM has been signed by 243 MPs. It calls, inter alia, for a scheme to give home buyers a rebate on stamp duty if they carry out certain works to improve the energy efficiency of their home.

5. A tax allowance for companies training installers of energy-saving equipment

Once again, this measure was proposed in the “Clean Dozen” last year. Installers, programme managers and fuel poverty campaigners such as National Energy Action had all identified the particular problems with capacity and training suffered by the energy efficiency industry. They were also unanimous in their view that the market is installer-led – in other words, that householders tend to heed the advice of installers when making product choices. Where installers are not trained to install condensing boilers, for example, they recommend less energy efficient products. We were therefore most surprised that the current consultation made no reference at all to this measure.

Expert opinion and evidence as to potential effectiveness

- **Solent EEAC:** *“There are chronic delays in fitting insulation and central heating equipment due to the lack of trained fitters, which the tax allowance for training will help overcome.”*

- **Doncaster Metropolitan Borough Council:** *“This measure would help, as heating installers need better training on installation to overcome capacity problems and cut delivery times.”*
- **Eastleigh Borough Council:** *“These measures would enable us to be much more effective in pursuing energy efficient policies.”*
- **Leicester City Council:** *“There is a real skills shortage of well-trained engineers that would benefit from a tax allowance for companies in the energy efficiency market.”*
- **Northampton Borough Council:** *“This could reduce the costs passed on to the final consumer, as well as encouraging the training of personnel in the energy efficiency industry.”*
- **National Housing Federation:** *“This proposal would very much complement the Energy Saving Trust’s recently launched Code of Practice in energy advice. There is a shortage of suitably qualified installers and this would provide a targeted incentive to the sector.”*

General support

A number of the organisations and individuals supporting this response did not comment on the individual measures outlined above. However, many of them commented on the whole package of measures. Their views are quoted here:

- **Dorset and Wiltshire EEAC:** *“We support all of these measures, especially the stamp duty rebate for energy efficiency improvements.”*
- **Bradford City Council:** *“All of the proposed measures would be effective tools to ensure the country’s housing stock is improved in terms of its energy efficiency performance. The measures are well thought through and, in my experience working in the field of environmental policy, would send out powerful signals, support job creation and boost our efforts to reduce carbon dioxide emissions.”*
- **Derby City Council:** *“These proposals will further help to encourage Derby residents to be energy efficient in their homes. The measures are also likely to help the Council to meet its statutory obligation of a 30% improvement in domestic energy efficiency, based on 1996 levels, by 2011. Further, as domestic energy efficiency improves, there is a strong likelihood that less people in Derby will be fuel poor; this will help the Council in its attempts to tackle fuel poverty.”*
- **Gloucester City Council:** *“We support all of these measures – and would also recommend further measures to drive the take-up of solar water heaters and photovoltaic panels, as these are still beyond the range of most householders.”*
- **Gwynedd Council:** *“In Gwynedd we have difficulty in encouraging owner-occupiers and private landlords to install energy efficiency measures. We believe that the VAT reduction, landlord’s tax allowance and stamp duty rebate would be a positive step and would act as attractive incentives for both owner-occupiers and private landlords.”*
- **Wakefield Metropolitan District Council:** *“We support all of these measures, which will assist local authorities to make further progress towards HECA and tackling fuel poverty.”*
- **National Energy Foundation:** *“The current rate of progress in improving domestic energy efficiency is not sufficient to achieve targets set for the sector in the Climate Change Programme. Nor is it likely to be if energy prices remain low. Positive incentives are needed, and this package of measures is well-targeted at those who could help bridge the current gap between aspiration and performance.”*

- **TAROE (Tenants and Residents Organisations of England)** says that many tenants are still facing the choice between eating and heating. As a result, they believe that the VAT reduction will help their members to afford improvements and that the enhanced capital allowances on leasing equipment will enable local authorities and RSLs to invest in the most efficient heating systems.
- **West Midlands HECA Forum:** *“Our members’ experience is that persuasion is frequently the only tool available to encourage private landlords, cash-rich owner-occupiers or businesses of the necessity for energy conservation. These fiscal measures will change that situation in favour of the installation of energy-saving measures.”*

Council Tax reduction for householders installing energy-saving measures

This measure was proposed in last year’s “Clean Dozen” and attracted widespread support – including from many local authorities. We recognise that this is a policy area of some complexity, and that the measure cannot therefore be introduced without further detailed work and consultation – but we would nevertheless urge the Government to embark on such work without delay. We believe that there is merit in considering a variety of Council Tax mechanisms – a rebate or discount on the Council Tax bill for householders installing energy-saving measures; a system of Council Tax “low emission” bands; and/or a Council Tax surcharge on dwellings in, say, the G and H bands where householders do not sign up for a package of energy efficiency measures.

Conclusion

As is overwhelmingly clear from the foregoing, there is a wealth of expert opinion and evidence to the effect that the five measures outlined above would make a significant contribution to improving household energy efficiency and to helping the Government achieve its targets for eradicating fuel poverty and reducing carbon dioxide emissions. The organisations and individuals whose views we have quoted have a unique breadth of experience and expertise. We trust that their views – and ours – will be too powerful to ignore, and we therefore hope that the Government will proceed to implement the five measures in Budget 2004, as a means of delivering its environmental and social objectives and sending the appropriate and much-desired signals to industry to plan for a long-term energy efficient and low carbon future.

Association for the Conservation of Energy 24 October 2003

Annexes:

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| Annex 1 | List of supporting organisations and individuals |
| Annex 2 | “The Clean Dozen” |

Annex 1

List of supporting organisations and individuals

Local authorities

Aberdeen City Council
Allerdale Borough Council
Ards Borough Council
Argyll & Bute Council
Ashford Borough Council
Basingstoke and Deane Borough Council
Bedfordshire County Council
Bradford City Council
Brent London Borough Council
Broadland District Council
Brighton & Hove Council
Broxtowe Borough Council
Bury Metropolitan Council
Caerphilly Council
Cambridgeshire County Council
Caradon Council
Carrick District Council
Chester City Council
Chester-le-Street District Council
Conwy County Borough
Cornwall County Council
Denbighshire County Council
Derby City Council
Doncaster Council
Durham County Council
Easington District Council
East Ayrshire Council
East Cambridgeshire District Council
East Devon District Council
East Hampshire District Council
East Hertfordshire District Council
East Lindsey District Council
East Staffordshire Borough Council
Eastleigh Borough Council
Essex County Council
Falkirk Council
Fareham Borough Council
Fife Borough Council
Flintshire County Council
Glasgow City Council
Gloucester City Council
Gosport Borough Council
Greenwich London Borough Council
Guildford Borough Council
Gwynedd Council
Harrogate Borough Council
Hart District Council
Havant Borough Council

Isle of Anglesey County Council
Isle of Wight Council
Isles of Scilly Council
Kennet District Council
Kerrier District Council
Lancaster City Council
Leicester City Council
Lewisham London Borough Council
Lincoln City Council
Maldon District Council
New Forest District Council
Newark & Sherwood District Council
Newport Borough Council
North Dorset District Council
North Hertfordshire District Council
North Kesteven District Council
North Lincolnshire District Council
North Norfolk District Council
North Shropshire District Council
North Somerset Council
Northampton Borough Council
Northern Ireland Housing Executive**
Norwich City Council
Nottinghamshire County Council
Oadby & Wigston Borough Council
Oxford City Council
Penwith District Council
Portsmouth City Council
Purbeck District Council
Renfrewshire Borough Council
Restormel Borough Council
Rother District Council
Rushmoor Borough Council
Scottish Borders Council
Sedgefield District Council
Shrewsbury & Atcham Borough Council
South Ayrshire Council
South Bedfordshire District Council
South Derbyshire District Council
South Holland District Council
South Lakeland District Council
South Somerset
Southampton City Council
Southwark London Borough Council
Strabane District Council
Sunderland Borough Council
Swale Borough Council
Swindon Council
Tamworth Borough Council
Teignbridge District Council
Test Valley Borough Council
Torbay Borough Council
Tower Hamlets London Borough Council
Wakefield City Council
Weymouth and Portland Borough Council

Wiltshire County Council
Winchester City Council
Wokingham District Council
Wrexham County Borough Council
Wycombe District Council

** Responsible for housing provision in Northern Ireland

Energy Efficiency Advice Centres

Aberdeen and North East
Anglia East
Bedfordshire & Hertfordshire
Black Country
Bristol and Somerset
Carlisle & County
Central Midlands
Cheshire
Cornwall
Devon
Dorset and Wiltshire
Essex
Gloucestershire
Greater Manchester North
Greater Manchester South
Kent
Kirklees, Calderdale & Wakefield
Lancashire
Leicestershire and Northamptonshire
Lincolnshire
Lothian and Edinburgh
Merseyside
Mid and South West Wales
Milton Keynes, Bucks and East Berks
North East London
North Wales
North West London
Northern and Western Isles
Northumbria
Nottinghamshire and Derbyshire
Shropshire, Herefordshire and Stoke
Solent
South East London
South East Wales
South Yorkshire
South West London
South West Scotland
Strathclyde and Central East
Strathclyde and Central West
Surrey and East Sussex
Tayside
Tees and Durham
Thames and Central London
Thames Valley

Warwickshire, Worcestershire and Coventry
West Sussex
York, North Yorkshire & East Riding

Other energy advice/delivery bodies

Beat The Cold (Stoke-on-Trent)
Centre for Sustainable Energy
Creative Environmental Networks
EAGA Partnership Ltd
Energy 21
Energy Action Scotland
Energy Conservation and Solar Centre
Energy Projects Plus
Midlands Energy Efficiency Consortium
National Energy Foundation
National Energy Services Ltd
Newark & District Energy Agency
SCARF (Aberdeen)
Severn Wye Energy Agency
Sustainable Energy Action
Warm Hearted Homes Advice Centre (Devizes)
West Wales Eco Centre

Members of Parliament

Mr David Amess
Ms Vera Baird
Mr Norman Baker
Mr Gregory Barker
Mr Harry Barnes
Mr John Battle
Mr Harold Best
Mr Tim Boswell
Mr Peter Bottomley
Mr Tom Brake
Mr Colin Burgon
Dr Vincent Cable
Ms Patsy Calton
Mr Colin Challen
Sir Sydney Chapman
Mr David Chaytor
Mr Michael Clapham
Ms Helen Clark
Mr Harry Cohen
Mr Frank Cook
Mr Jim Cousins
Mr David Crausby
Mrs Janet Dean
Mr Jim Dobbin
Mr Brian Donohoe
Ms Sue Doughty
Mr Jim Dowd

Mr David Drew
Ms Julia Drown
Mr Huw Edwards
Mr Clive Efford
Ms Barbara Follett
Mr Don Foster
Rt Hon Derek Foster
Dr Ian Gibson
Ms Jane Griffiths
Mr Win Griffiths
Mr Douglas Henderson
Mr Paul Holmes
Mr Kelvin Hopkins
Mr John Horam
Dr Brian Iddon
Mr Eric Illsley
Mr Jon Owen Jones
Dr Lynne Jones
Mr David Kidney
Mr Peter Kilfoyle
Mr Archy Kirkwood
Mr Mark Lazarowicz
Mr Elfyn Llwyd
Mrs Alice Mahon
Mr John McDonnell
Rt Hon Michael Meacher
Mr Chris Mole
Dr Doug Naysmith
Mr Martin O'Neill
Ms Diana Organ
Mr Adam Price
Mr John Pugh
Ms Joan Ruddock
Mr Bob Russell
Ms Debra Shipley
Mr Alan Simpson
Dr Bob Spink
Mr Andrew Stunell
Mr David Taylor
Mr Matthew Taylor
Mr Simon Thomas
Dr Jenny Tonge
Mr Paul Truswell
Mr Paul Tyler
Dr Rudi Vis
Mrs Angela Watkinson
Mr Brian White
Dr Alan Whitehead
Mrs Betty Williams
Mr Peter Wishart

HECA/Fuel Poverty Forums

East Midlands Fuel Poverty Forum
Eastern Region Fuel Poverty Forum
London Fuel Poverty Forum
London HECA Forum
Midlands Energy Efficiency Consortium (HECA)
Midlands Fuel Poverty Forum
North East HECA Forum
North Wales HECA Forum
North West Fuel Poverty Forum
North West HECA Forum
UK HECA Forum
South East Fuel Poverty Forum
South East HECA Forum
South West Fuel Poverty Forum
South West HECA Forum
Welsh HECA Forum
West Midlands HECA Forum
Yorks and Humberside HECA Forum

Trade Associations

Association for Environment Conscious Building
Association of Coal Mine Methane Operators
British Biogen
British Energy Efficiency Federation
British Hydro
British Rigid Urethane Foam Manufacturers Association
Builders Merchants Federation
Central Heating Information Council
Combined Heat and Power Association
Council for Energy Efficiency Development
Draught Proofing Advisory Association
Energy Systems Trade Association
Glass and Glazing Federation
Insulated Render & Cladding Association
Lighting Association
National Association of Loft Insulation Contractors
National Cavity Insulation Association
National Home Improvement Council
PV-UK
Renewable Power Association
Society of British Gas Industries

Other organisations

Age Concern England
Campaign for the Protection of Rural England
Cornwall Local Authority Support Programme
East London Communities Organisation
Faculty of Public Health Medicine
Friends of the Earth
Friends of the Earth Scotland
GLOBE UK All-Party Parliamentary Group
Green Liberal Democrats
Green Party
Greenpeace
Help the Aged
National Energy Action
National Federation of Residential Landlords
National Federation of Women's Institutes
National Housing Federation
National Right to Fuel Campaign
New Economics Foundation
Parliamentary Renewable and Sustainable Energy Group (PRASEG)
RSPB
SERA
Shelter
TAROE (Tenants and Residents Organisations of England)
Tory Green Initiative
TRANSCO
UNISON
Unit-[E]
UK Public Health Alliance
Women's Environmental Network
WWF-UK