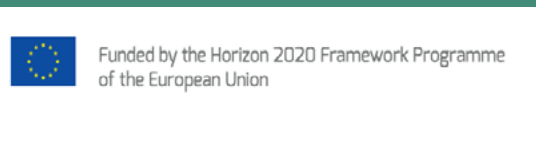


A toolkit for a just transition *with the people*



*Agenda Co-Creation and Knowledge
Innovation (ENGAGER 2017-2021)*





The drivers of energy poverty are deeply structural - they span, at least, across our current economic, social, employment, energy, climate, taxation, welfare, housing and health policies. Energy poverty causes go far beyond the triad of “low income - poor energy efficiency - high expenditure”, which is traditionally considered to set the context to addressing energy poverty.

European and national strategies for tackling energy poverty still fail to recognise this. Actors need to acknowledge the full picture to become allies. **To build a just transition not FOR but WITH the people, an inclusive, just transition that leaves no one behind and where citizens are true agents of change**, we need to look deeper into the structural injustices that no renovation or broad employment policies will solve taken alone.

Hence, **this toolkit provides key inputs for EU, Member States and all relevant actors to set up comprehensive and out-of-the-box responses to energy poverty.** This toolkit is ENGAGER’s contribution to a just transition with the people.

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Building renovation won't solve energy injustices: intersectional policies will

The Renovation Wave needs to adopt the perspective of vulnerable people, acknowledging externalities caused by housing market mechanisms.

Diagnosis: Vulnerable people don't come first in renovation policies

EU policies have long been promoting energy efficiency and housing renovation as a one-size-fits-all solution to overcome energy poverty and consumer vulnerability. Indeed, people living in inadequate housing are disproportionately affected by energy poverty. Low energy performance remains one of the leading causes of the inability to secure adequate comfort levels in the home. However, energy efficiency corrections hide structural injustices behind housing, urban planning and territorial development, and energy policies rarely address their distributional impact. Currently, addressing energy poverty appears to be just a positive side-effect of energy efficiency policies.

Injustice goes beyond the housing and energy markets:

- 1 Access to finance for energy efficiency measures for the low-income groups is fundamental, but it is not the only issue. Renovations don't happen in silos. Lower-income households and tenants often lack the capital for high upfront costs or the decision-making ability, including the coordination of neighbours and local administration, to invest in building renovations. The coherence of the distribution of support measures must go beyond short-term market measures and investors' direct financial interests.
- 2 The private sector and landlords remain disengaged in energy-efficient renovations. Many believe their role is not to alleviate energy poverty and fix systemic injustices. Some only see the financial return on investment of the price premium. "Carrot and stick policies" haven't worked so far: public policies have yet to find a way to engage them in the long term for the good of the most in need.
- 3 The multidimensional aspect of energy poverty and social exclusion remains absent from the public discourse. Racialised, marginalised and disabled people are particularly at risk of suffering from housing discrimination. Upgrading the building stock can lead to unaffordable housing, gentrification and segregation. As a result, inhabitants may have to move to cheaper places that might be energy-inefficient again. The dynamics of solidarity and local development, particularly at the neighbourhood level, remain absent in public discourse.

Therefore, renovation policies and strategies must go beyond immediate financial impacts and outcomes, acknowledge housing market mechanisms and externalities, and focus on improving the lived experience of people.

Solution: Energy renovation to strengthen social cohesion

- 1 The issue of fair funding for renovation is not just about the availability of financing options. Of course, politicians must develop alternative financing renovation measures and free-renovation programmes to enable the largest possible number of people to benefit from them, including renters and low-income homeowners. Meanwhile, when doing cost-benefit analyses, long-term improvement in households' welfare, health, social integration, and well-being shall be regarded as assets for society. It requires the assessment of the improvements in the surrounding environment and air quality for the inhabitants. In this regard, public authorities should act as guarantors. This should lower the credit risk for investors and stimulate long-term investment plans to finance low carbon strategies.

In Ireland, medical practitioners can refer patients affected by chronic respiratory conditions to the [Warmth and Wellbeing Scheme](#). This programme offers free extensive energy efficiency measures for qualified dwellings.

2 The social and solidarity economy is an important part of the housing renovation sector. This can mean, for example, motivating private investment toward quality affordable housing, developing public rent-affordability guarantees among private owners, or even boosting alternative housing ownership models such as cooperatives. This requires action at the level of neighbourhoods and multi-family dwellings, not only at the level of individual units. Giving priority to these kinds of non-for-profit housing should counter speculation, particularly over empty housing, contain rent increases and avoid evictions due to gentrification and housing partitioning. Owners should get supported to get into these forms of solidarity housing. They should have priority access to public one-stop-shops to support energy renovation in homes occupied by vulnerable people, ease red tape and guarantee that renovation reaches those who need it most.

In France, the [Réseau Eco-Habitat](#) is set up as a non-profit association. It helps homeowners in energy poverty access finance and grants and mobilises service providers to carry out thorough energy renovations in an environment-friendly manner. The Network works alongside Caritas volunteers to provide moral support to households as well.

3 There is no one-size-fits-all solution: policies need to consider people's multidimensionality and all their circumstances, not only the ones linked to energy. It means that regarding housing improvement, governments and municipalities; policies and funding should give priority to the most vulnerable people (e.g. older people, marginalised people, people with health issues and disabilities and people from ethnic minorities), who would enormously benefit from renovation measures. The impacts of these actions should not only focus on comfort and energy cost savings, but also on social integration. Earmarking public funds for the renovation of buildings allows them to be regarded in the wider context of common property and as a tool for mitigating social conflict.

The Renovation Wave needs an approach centred around Human Rights, inclusivity, non-discrimination and intersectionality, placing the right to energy services, housing, health and water at its core and valuing diversity. We need accurate and up-to-date data on housing renovation and long-term monitoring for vulnerable people. Only then can we genuinely secure accessibility, affordability and inclusion.

The [residents' association of the Guetaria neighbourhood](#), in the deprived Orcasitas district of Madrid, lobbied the city council for support for energy renovation and asbestos removal. They have renovated a large number of buildings, reducing the energy vulnerability of the whole community. The whole area, mainly composed of low-income owners, will eventually benefit from these interventions.

Driven by the social enterprise Bankers without Boundaries, the [Green Neighbourhoods as a Service \(GNaaS\)](#) project will enable many European cities to renovate entire communities. It will offer long-term deep energy renovation and better quality of life for homeowners and residents. In return, small maintenance fees will be attached to the property for 30 years.



Enabling the enabler

Diagnosis: Frontline workers need support too

7

An increasing number of stakeholders are involved in energy poverty mitigation strategies, but many lack the expertise and access to human, material and financial resources to understand and treat the phenomenon's complexity. Most institutions dealing with energy poverty have broader social remits (such as social exclusion, housing, poverty, inequalities, etc.) or lack the mandate to deal with the multidimensionality of the issues (for instance, energy regulators, consumers' associations or Ombudspersons). The work of frontline workers is limited to their remit, without the possibility of dealing with all the problems. As a result, they don't succeed in making lasting improvements to the situation of those in need.

This need for further skills and competencies is reflected in the following phenomena:

- 1** The lack of broader knowledge and skills creates mistrust between the organisations that might help and vulnerable people. For instance, misleading narratives around energy poverty, such as homeownership and energy poverty, mean that many potential intermediaries miss out on the households' situation. Many vulnerable people remain stigmatised as (un)deserving poor even among the public, private and charity actors.
- 2** Frontline workers must deal with limited human, material or financial resources. They often prove insufficient to meet the diverse needs of the population. For instance, there is a growing gap between the services provided in urban and rural areas; many services are fully digitalised to optimise the costs - at the expense of local populations. Regarding financial resources, for instance, available funding may be limited in time and volume, and some countries apply the "first come, first served" principle.

3

The lack of cooperation between the institutions prevents a good delivery of the services for all people, whether they live in urban or rural areas. People have difficulties understanding the different stakeholder's remits and support schemes.

Solution: Upskilling those who can help

To improve the services provided to vulnerable households, dealing with energy poverty should be a priority for the entities in contact with them. To achieve this, various development areas are needed:

1

There is an urgent need to build more skills within the entities potentially in contact with people in energy poverty. For example, frontline staff of energy suppliers need a broader knowledge of the dimensions of energy poverty to go beyond the traditional silo approach. They also need social and behavioural skills, i.e. how to deal with people in need and signpost them to support measures or funding sources. Finally, they need access to training on people's rights, energy poverty measures, housing and social assistance, energy tariffs, change suppliers, etc. One way forward is the "energy social worker" figure within the social services, who treats energy poverty as a priority task, considering the multidimensional dimensions of energy poverty.

[Aeioluz](#), in Valencia, Spain, is a cooperative that provides training to trainers in the whole energy sector. Their work empowers municipalities, companies, schools, training centres, communities, public and private entities and the third sector.

Operating on the whole Spanish territory, [Ecodes](#) provides advice on contract optimisation, efficient consumption, information workshops to social workers, on-site analysis of the situation of households at risk of energy poverty and implementation of energy efficiency measures in vulnerable homes.

2

Local communities need supportive frameworks and sufficient resources. Organisations assisting vulnerable people need to devote more time, human and financial resources. It will result in more straightforward procedures, less red tape, greater trust and better understanding and support for the most vulnerable. But this cannot be done without increasing the financial resources available to the institutions to recruit and train new staff.

Local help desks and one-stop-shops can provide broader resources for the staff and facilitate access to available support for the people in need. These help desks must be distributed equally between rural and urban areas, including socially disadvantaged neighbourhoods, to ensure an even level of services. They must use plain language and offline communication tools, such as face to face meetings, to overcome literacy barriers.

In France, [PIMMS](#) are multi-sectoral information centres set up in rural areas or sensitive urban zones. People can receive tailored support related to social benefits, energy, and any other public services.

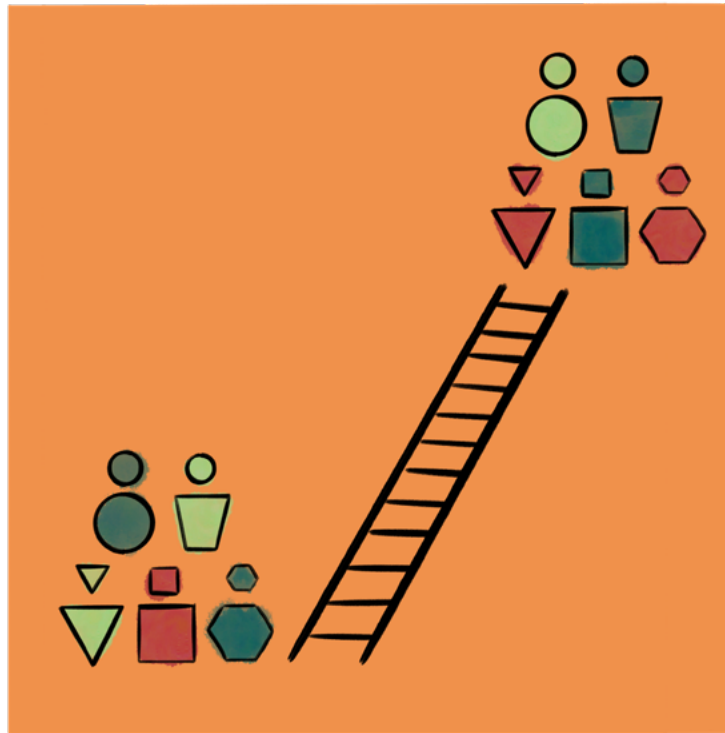
In Barcelona, the [Punt d'Assessorament Energètic](#) offers free and open consultation on household energy issues (bill optimisation, supplier switching). This service helps detect households affected by energy poverty and provides them with additional assistance.

3

The cooperation of actors is essential to learn from each other and share good practices between institutions that can tackle energy poverty. This cooperation should take place between private and public initiatives to tackle energy poverty (social services, NGOs, social enterprises, energy companies, health professionals, housing companies, etc.). This cooperation will encourage the development of a more transparent ecosystem, the dissemination of comprehensive approaches, and the pooling of resources. A map of initiatives and actors addressing energy poverty could be created and used to set up permanent dialogues at national, regional, and local levels. National governments should encourage, fund, and give visibility to local social innovations that start from the grassroots and promote their cooperation on a broader scale. This will enable them to be scaled up through open innovation programmes and platforms.

The [energy poverty platform in Grenoble](#) (France) is located within the social service department of the city. The platform coordinates a network of actors working together to provide social assistance, budget management, legal advice (for mediation, energy bills, rent etc.) and technical support based on energy audits, housing improvements and energy advice. This cooperation permits a referral system offering a single contact point for people seeking assistance with their social, housing and energy issues.

The [Scottish Federation of Housing Associations](#) and two charities have set up regular energy forums for staff interested in energy and energy poverty issues. They share experiences, good practices and get informed on the latest energy developments.



An energy transition *with* - not for - the people

Diagnosis:
People are more than consumers:
they are citizens with rights

Energy markets have long forgotten the fundamental role of the citizen beyond being only consumers, and this is still felt today. Although everyone has a role to play in the energy transition, few manage to exercise their power; while others remain bystanders. People have more to offer than being passive users.

This situation has various origins:

1

Regulation and the initial design of the market, which was, and continues to be insufficiently transparent, exclusive and not oriented towards the needs of citizens;

2

The disproportionate market share of companies applying a business model that is not people-oriented and that favours their shareholders;

3

The lack of resources and support for forums for exchange and discussion open to all, regardless of people's ability and willingness to engage. Citizens' access to information about their rights or opportunities remains limited. Associations and services oriented towards people's needs or direct democracy are often underfunded.

4

The research landscape and scope for engaging citizens who are hard to reach remains too limited due to barriers such as the lack of information, resources, interest, time...

Solution Time for democratising energy

1

For people to embrace their whole potential as agents of change, the work must be done in three different directions: at the level of regulation, at the level of corporate culture and business models, and finally by levelling the playing field and listening to the stakeholders such as consumer organisations, NGOs and market participants.

Policies and regulations need to listen to and embrace people's needs. It would boost engagement and respect the different opinions expressed. The following actions could have positive impacts:

- Direct democracy, open dialogue and transparent consultations would boost trust, avoid greenwashing and encourage participation. For instance, regulators could organise tripartite roundtables and regular meetings between citizens, ombudspersons and energy companies;
- To put all citizens on an equal playing field with corporate interests, policy and decision-making processes should give priority to social value rather than shareholders' interests.

In Germany, more than 70 municipalities have decided to remunicipalise the distribution grid. It gives them the opportunity to implement independent energy policies and implement sustainable and transparent energy systems. For example, during a referendum conducted in [Hamburg in 2013](#), citizens voted in favour of a full remunicipalisation of the distribution grid. This included the formation of an Energy Advisory Board, which opens the participation to the public at the bi-annual meetings.

2

When energy companies, such as suppliers and DSOs, consider consumers as citizens, they start to treat them fairly. The following actions could have a positive impact on companies' clients:

- A customer-oriented corporate culture should be valued in terms of social, environmental and governance (ESG) performance criteria;
- The redistribution of earnings should not only be for the benefit of the shareholders: a part should systematically be redistributed to the most vulnerable users via a support fund and the profits should be used to improve the service and the network for all;
- Companies should adhere to sectoral Code of Conducts and strictly enforce them;
- Products and services should be co-designed with citizens, be better tailored to their needs, and eventually be fairer and more inclusive;
- Dedicated corporate departments dealing with vulnerable people and with people in different circumstances should be strengthened;
- Diversity in the recruitment process should be encouraged;
- Loyal consumers should be rewarded, not penalized, by staying with the same supplier.

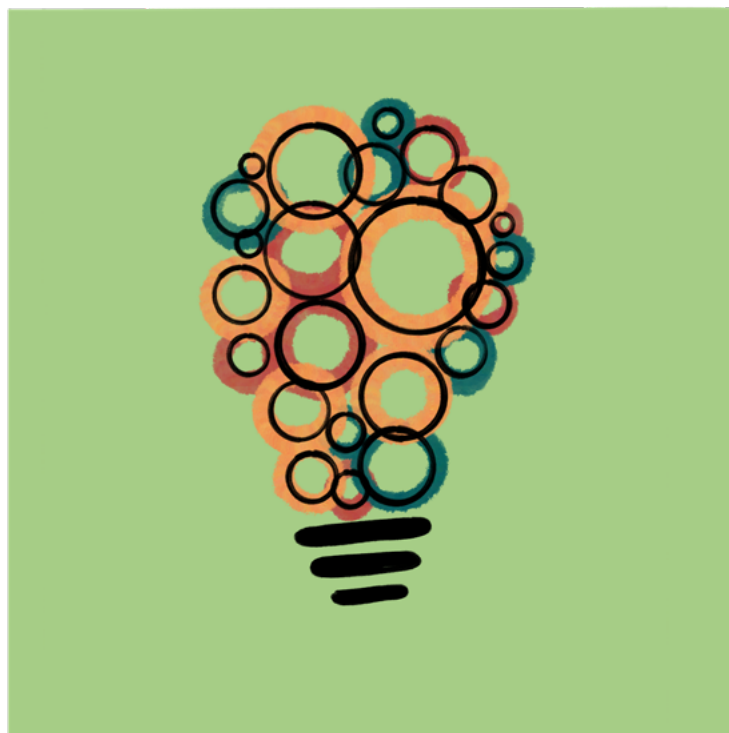
In the UK, [Bristol Energy](#) has set up some “living labs” with volunteering households to test their new low-carbon “heat as a service” product, with the help of Energy Systems Catapult. This experiment has led to the co-design of an alternative service that is tailored to their individual home and lifestyle and that replies exactly to the people’s needs, while also being commercially viable.

3

For (vulnerable) populations to be really heard, several instruments should be promoted:

- Energy communities and cooperatives should be easy to join, for instance through simplified membership rules;
- Information and activities to promote citizens’ engagement should be encouraged;
- Trusted intermediaries should have broader mandates and be better financed;
- More research should be performed on understanding the limitations of people’s engagement and finding creative ways to overcome them.

Projects to provide information and boost engagement are being implemented in Spain. For instance, [Socaire](#) has dedicated workshops that provide information on energy contracts, energy bills, energy due diligence and energy efficiency. The [Asociacion Ciencias Ambientales](#) in Madrid has set up energy information points.



Tackling energy poverty through integrated policies

Energy poverty is a structural problem beyond the simplified combination of drivers of “low income - high expenditure - low energy efficiency”. The EU and its Member States must implement more comprehensive responses.

**Diagnosis:
Sectoral mitigation policies
are insufficient**

Europe and its Member States are at a crossroads in the fight against energy poverty. Despite the efforts of the public and private sectors, energy poverty is not decreasing - it has even increased with the COVID-19 health crisis, lockdowns and their impact on the economy. The European and national strategies fail to recognise that drivers of energy poverty are more structural - they span, at least, across social, employment, energy, climate, taxation, welfare, housing and health policies.

The lack of an integrated strategy shows its limits at several levels:

- 1** Many of the above policies may impact household resources and well-being and, therefore, energy poverty levels. For example, carbon taxes applied indiscriminately to energy bills or consumer goods can severely affect household incomes and increase energy poverty.
- 2** Siloed approach, unclear mandates and budget lines, the lack of consultation between the parties involved lead to a dispersion of resources and, therefore, to inadequate results. Often, no one knows who is doing what or who has a complete view on the matter. For example, social workers are usually not consulted by the building, transport or urban planning sectors.
- 3** Today, Member States have many uncoordinated strategies. The answers often do not provide a lasting and comprehensive solution to the problem. On the contrary, they might maintain the status quo or worsen the situation. For example, many poorly designed “social bonuses”, bill support schemes for electricity or gas and energy efficiency measures may fail to address underlying issues.

To truly leave no one behind, the European Union must be bolder on social issues and tackle the negative side-effects of economic policies. By leaving it up to the Member States to decide what measures to put in place to combat energy poverty, Europe is foregoing the opportunity to demonstrate real leadership.

Solution: Fighting energy poverty needs comprehensive approaches

A pan-European cross-sectoral strategy against energy poverty, adapted to national and local contexts, will enable the Member States to acknowledge that energy poverty goes beyond economic parameters only. The following actions need to be set up to allow for an integrated EU strategy against energy poverty:

- 1** All policies should include energy poverty impact indicators. This will enable the inclusion of more dimensions and more precise targets for energy poverty reduction and help grasp, understand, and counteract possible negative externalities on vulnerable households.

EU funded projects and strategies include gender or environmental impact assessment. The European Union should add the social and energy poverty impacts too.

- 2** The EU should call on the Member States to develop an integrated approach to tackling energy poverty in line with a common EU strategy framework. It should lead the Member States to analyse and recognise that the drivers of energy poverty are broader than poverty alone or the limiting combination of “low income - high expenditure - low energy efficiency” drivers. This will help to overcome sectoral perspectives, feedback loops and unintended side effects.

The European Commission's latest Guidance on energy poverty (2020) and the Just Transition Mechanism do not go far enough. If the EU really has the ambition to leave no one behind, they should have a bolder pan-European strategy. It should cover more aspects, such as taxation issues, mitigation and structural measures, and engage the stakeholders better.

3 Member States should designate a body responsible for framing and harmonising the efforts at all levels (including political strategies, targets, budgets and mandates) to define bold, comprehensive solutions and ensure that all policies consider social and energy poverty impacts.

For example, national intersectoral energy poverty task forces could coordinate the actions of each government department and ministry on the programmes that fall within their remit and the measures they should implement.

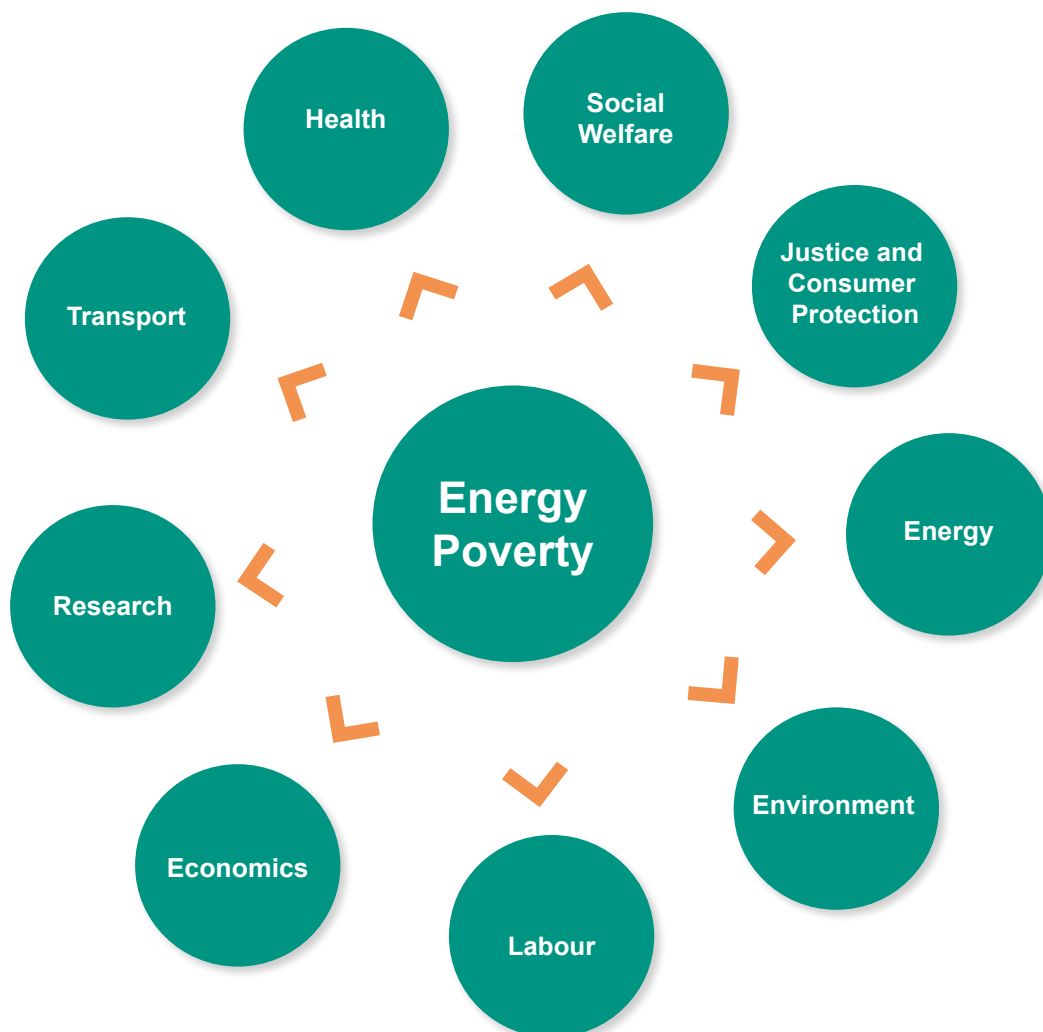
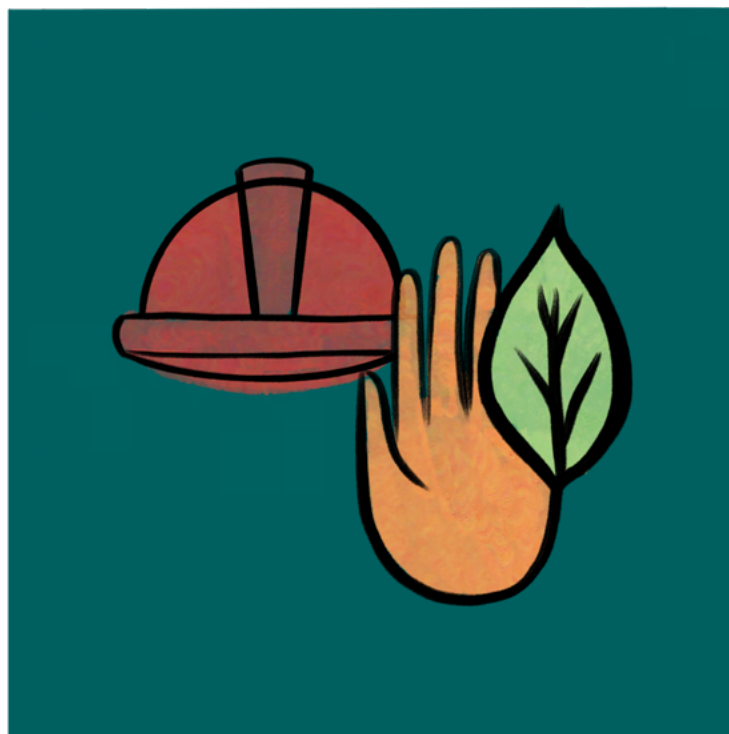


Figure 1.1 Energy Poverty task force



Better, fairer jobs with the energy transition

Green jobs, which positively affect energy transition and environmental preservation, could solve the three leading causes of energy poverty: low incomes, low energy efficiency, and high energy costs. But the effect will not be automatic: green job policies have to target the most vulnerable people and communities proactively.

Diagnosis: In the energy transition, green jobs for whom?

Precarious employment and low-quality jobs keep people and communities poor and vulnerable. The energy transition represents an opportunity to respond to the climate emergency while creating more significant equity and social cohesion, mainly by creating jobs in sustainable sectors. While the EU Green Deal should ensure that “no one is left behind”, the impact on the labour market and job generation is not yet at the centre. Increasing post-COVID-19 investments are no guarantee that they will benefit the people who need them most. The risk is to see (yet another) form of “social washing”, not matching words with deeds.

The current work markets can hardly respond to social challenges:

- 1** The energy transition will generate jobs in sectors related to housing renovation, the development of smart grids, renewable energy capacity and energy communities, decarbonisation etc. These jobs are mainly held by healthy men, while most people in poverty and energy poverty are women, ethnic minorities and people facing the consequences of chronic diseases.
- 2** Lifelong learning is the neglected area of employment policies. Businesses often reward short-term economic performance at the expense of employee welfare and social impact. Employees might be limited to performing repetitive tasks and lack long-term empowerment prospects—the unemployed and underemployed sink into the vicious circle of undeclared, part-time or temporary jobs. Social injustices, such as poverty, perpetuate. Hence, the effects of the transition in the job markets may not reach vulnerable people, people with low education and skills, or people facing energy poverty.
- 3** Companies' business models often put profit before people. Costly and difficult to implement solutions are favoured over effective small-scale programmes. For example, in the construction sector, many companies have little to do with ESG (environmental, social and governance) criteria and monitoring, while the grey economy is widespread. Financial capital remains in the hands of the most powerful without trickling down to the rest of society. More participatory types of organisations exist, but they may face difficulties accessing funding from investors or management.

Solutions:

Green jobs for vulnerable people and communities

- 1** A just energy transition has gender equality and inclusivity at its heart. People, whatever their circumstances, skills and backgrounds, have to get fair opportunities and competitive salaries. For example, older and younger workers should not be excluded a priori from certain jobs. Companies need to set up mentoring programmes with workers with uncommon profiles to encourage exchanges and learning.

Municipalities could propose quotas for people out of work and suffering from energy poverty in local renovation works and energy communities. It would allow them to work and learn a profession while providing a valuable contribution to the community. Governments should offer tax incentives for this type of green jobs.

[In Barcelona](#) (Spain), unemployed women receive training to become energy community facilitators. Their work will empower the whole neighbourhood to deal with energy poverty and vulnerability.

- 2** Specialised training and coaching for workers, companies and trade unions to understand better the green transition's social challenges, such as the energy poverty risk and issues, are a matter of corporate social responsibility. Providing information on social issues, legal and technical support will enable people to have a broader understanding of the impact of the transition on their lives and wellbeing. Existing networks, such as local NGOs and associations, sustainable building professionals and social workers, are the natural intermediaries between private companies,

citizens and public services: they have built trust, soft skills and experience in dealing with vulnerable individuals over time.

The [Rural Social Entrepreneurship School](#) aims to boost social entrepreneurship for endogenous development and climate change mitigation. The town's inhabitants host boarding students to share their lived experiences. They learn to read a territory and build solutions that improve peoples' lives based on social and environmental entrepreneurship.

3 Putting social impact at the heart of businesses is essential to create quality jobs rooted in local realities and people's needs. They can take the form of social entrepreneurship or cooperatives owned by the inhabitants. Transparent governance is essential, and the management must be inclusive by design. The Renovation Wave should explicitly support the creation of small and medium-sized social impact businesses, in particular in deprived areas. In parallel, people and communities most affected by the energy transition need to receive vocational training by competent authorities, such as employment agencies, in partnership with local businesses. This way, they become part of the solution: they can maintain renovated buildings or renewable energy installations. This creates a virtuous circle: the energy transition meets communities' renewable energy needs while stimulating local business and job creation.

[Sapiens](#), in Valencia (Spain), is a social enterprise specialised in creating energy communities. It works both in the spaces for self-consumption and in the production lines to the market from the self-management of the rural environment.

The energy transition, shifting the economy to a sustainable energy mix, is an opportunity to reduce Europe's growing inequalities regarding labour and income distribution. "Green" jobs should be inclusive, and policymakers must prioritise vulnerable people and communities to benefit from the opportunities of the Green Deal. This means learning from them and seeing them as part of the solution.



Building citizens' trust: Ombudspersons as intermediaries between citizens and public and private entities

Diagnosis: Citizens' energy rights need better enforcement

Energy consumers are citizens with Rights: accessing energy services is crucial for citizens' well-being, health, and social integration. But too often, energy rights remain unenforced, and energy users are denied justice. Energy citizens need a champion to echo their voice, inform and enforce their rights. Ombudspersons are independent statutory bodies whose job is to enforce citizens' rights related to energy services, provide redress and act as trusted intermediaries between the citizens and public and private entities.

However, although EU directives call for the creation of Ombudspersons, many countries haven't set them up. **The lack of an independent intermediary results in shallow trust in energy markets:**

- 1** Energy issues remain highly technical and complex. Tariffs and deals lack transparency. Many energy suppliers practice aggressive canvassing. The evolution of energy markets and networks, such as the systematic rollout of smart electricity meters, raises new problems: privacy, security, control over the data produced, and anxiety related to increased complexity.

2

Often when Ombudspersons exist, they lack visibility, power or independence.

3

People facing temporary or permanent difficulties are even less aware of their rights and access to justice. They seldom turn to Ombudspersons.

[Research conducted in Portugal in 2018](#) showed that energy suppliers' aggressive canvassing often leads to unfavourable contracts, distrust in the energy market and contract switching avoidance. Many households are not well informed about their tariffs, especially when prices vary along the day, and even less aware of who they can turn to enforce their energy rights.

Solution:

Creating and strengthening independent Ombudspersons

Citizens need an enforcing body of their rights and a reliable, independent and trusted source of information on these rights, market deals, energy regulations and good practices related to energy use. Ombudspersons bridge the gap between citizens and the market and level the playing field among the different stakeholders. **They build trust in the market.**

1

Ombudspersons inform decision-makers, regulators and energy companies and monitor the implementation of collective and individual rights. They improve the transparency of energy systems.

By handling all consumer complaints, Ombudspersons monitor the functioning of the market and act as whistleblowers when multiple occurrences of the same problem arise. They formulate recommendations towards decision-makers, therefore enabling the construction of collective energy rights. They provide data on the actual performance of energy systems, including how energy companies treat their customers.

[In its 2020 Activity report](#), the French Energy Ombudsperson reported an increase of 19% in the number of disputes submitted compared to 2019. The Ombudsperson asks suppliers to improve transparency in information, marketing, and contracts to gain citizens' trust. The Ombudsperson will monitor the particularly problematic complaint handling practices and number of disputes stemming from two energy companies.

2

Empowering Ombudspersons

National Parliaments should appoint Ombudspersons and give them the resources to perform their activities independently from governments, regulators and businesses. Ombudspersons should have the same statutory independence and recognition as the regulator and be invited to all relevant policy, regulatory and technical discussions. It would give them the power and legitimacy to represent the public interest and be the qualified entities for collective redress actions.

Ombudspersons are natural middle persons between citizens and energy entities. For instance, they can establish close collaborative links with all entities present in the sector (including other sectoral Ombudspersons, companies and social workers) and network internationally to build capacity. To go further, Ombudspersons could put in place systematic referral systems toward other institutions. Many energy disputes stem from energy suppliers' dubious practices, malfunctioning landlords-tenants relationships or social welfare institutions. In that case, Ombudspersons should be able to transfer and resolve the case with the relevant parties.

The Catalan Ombudsperson is an excellent example of an active protector of citizens and their energy rights. [In 2020](#), its service received over 11 000 complaints from citizens. Since 40% of the Catalan Ombudsperson's actions regarded social policies, it created a Social Emergency Board with eight social entities to resolve social and poverty challenges.

3

Broaden access to the Ombudsperson.

Ombudspersons need to use simple tools and language to enable all citizens to access information and justice, independent of their circumstances.

For instance, the Ombudspersons should be using radio and television spots to inform citizens of their services and available for free. Besides the internet, people should lodge their complaints and access the Ombudsperson's advisory team via a free phone line. All supplier bills and communications to the customer should refer to the existence, role and independence of the Ombudsperson. Alternative ways to register complaints should be offered to everyone, particularly people with literacy issues or limited internet access.

For example, the [Ombudsperson in North Macedonia](#) allows for a complaint submission via email, in writing (via email or in-person), by phone or fax, or even orally through Minutes taken at the Ombudsman's office. It can also be handwritten and submitted in Macedonian or Albanian language. The complaint submission is free of charge.

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For more information visit: <http://www.engager-energy.net>

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