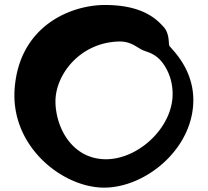


Our Ref: FOES/WHD

Warm Home Discount Team
Department of Energy and Climate Change
1st Floor Area C
3 Whitehall Place
London
SW1A 2AW



**Friends of
the Earth
Scotland**

14th January 2011

DECC Consultation on Warm Home Discount

Dear Sir / Madam

Friends of the Earth Scotland welcome the opportunity to comment on the consultation on the design of the Warm Home Discount scheme and the associated regulatory framework.

Friends of the Earth Scotland is an independent Scottish charity with a network of thousands of supporters and active local groups across Scotland. We are part of the largest grassroots environmental network in the world, uniting over 2 million supporters, 77 national member groups, and some 5,000 local activist groups - covering every continent.

Whilst we recognise that the proposals included in the consultation do not extend to Scotland, we still felt moved to comment. The latest statistics for fuel poverty indicate that nearly a third of all households in Scotland spend more than 10% of their household incomes on fuel bills. This is a higher percentage of the population than in England or Wales.

It is also the case that energy bills are, by nature of climate, higher in Scotland. Indeed, research shows that a household in the west of Scotland can expect to spend at least £130 more annually on fuel than a similar sized household in the west of England.

The proposals in the consultation to offer fixed rebate payments to those in receipt of pension credit **will not meet the needs of the fuel poor in Scotland.**

Social tariffs have been proven to save households money on a scale that a fixed rebate could not address. Additionally, as highlighted above, a fixed rebate would fail to address the difference in energy requirements in different climates through the UK.

We know that energy firms would not maintain a social tariff in Scotland whilst offering fixed rebates in England and Wales. We **strongly oppose** the phase out of social tariffs and the introduction of fixed rebates.

Therefore, in answer to questions 1 and 2, Friends of the Earth Scotland **do not** agree that Warm Home Discount policy should be implemented in line with the principles outlined. We also **do not** agree with the structure of the proposed Warm Home Discount scheme.

Yours faithfully

Juliet Swann, Head of Projects and Campaigns



**Scotland's champion
for our environment.**

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