Republic of Bulgaria
ECONOMIC
AND SOCIAL COUNCIL

OPINION

on

"MEASURES TO OVERCOME ENERGY POVERTY IN BULGARIA"

(own-initiative opinion)

Sofia, December 2015

The Economic and Social Council of the Republic of Bulgaria included in its Action Plan for 2015 the elaboration of an opinion on "Measures to overcome energy poverty in Bulgaria."

The elaboration of the opinion was assigned to the Labour, Incomes, Living Standard and Industrial Relations Commission (leading) and the Social Policy Commission.

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The draft opinion was discussed and adopted by the two commissions in a joint meeting of 4 December 2015.

At the Plenary Session held on 11 December 2015 the Economic and Social Council adopted this opinion[1].

[1]**The following sources were used to prepare this opinion:**

- Energy Strategy of Bulgaria by 2020 "For reliable, efficient and clean energy," June 2011
- Third Energy Package, the EU Official Journal, August 14, 2009
- Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. Roadmap for moving to a competitive economy, low carbon economy by 2050. Brussels, 8 March 2011, COM (2011).
- European Parliament resolution of 14 March 2013 on Energy Roadmap for the period until 2050 - The future of energy (2012/2013 (INI)).
- EESC opinion on 'Energy poverty in the context of liberalization and the economic crisis. "Brussels, 14 July 2010 TEN/ 420.
- EESC opinion on the "Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - Energy Roadmap 2050" Brussels, 23 May 2012, TEN/ 481.
- EESC opinion "Towards a coordinated European action to prevent and combat energy poverty". Brussels, 18 September 2013, TEN / 516.

ABBREVIATIONS USED

GMI	Guaranteed minimum income
VAT	Value added tax
EESC	European Economic and Social Committee
EC	European Commission
EU	European Union
EP	European Parliament
CPI	Consumer Price Index
ESC	Economic and Social Council
CEWR	Commission for Energy and Water Regulation
ILO	International Labour Organization
MRDPW	Ministry of Regional Development and Public Works
MLSP	Ministry of Labour and Social Policy
NSI	National Statistical Institute
WB	The World Bank
WHO	World Health Organization

1. CONCLUSIONS

1.1. ESC expresses its concern, emphasised in many analyses and assessments, that energy poverty is a growing problem in Europe and Bulgaria and threatens to become even greater in the future. A study of the state of energy poverty in the EU indicates that over 54 million people in Europe can be defined as energy poor - almost 11% of the EU population is in a situation where households are unable to adequately heat their homes at an affordable price.

1.2. We note with satisfaction the efforts of the EU and of various institutions and organizations to strengthen their attention to the problems of "energy poverty" and "vulnerable consumers". The EP resolution on the Energy Roadmap 2050 for the first time included a social dimension and supported the need for social dialogue involving all stakeholders; called for the protection of consumers through price transparency and information and asked the Member States to report regularly on actions taken to protect households from increasing energy bills and energy poverty.

1.3. Based on the EP recommendations on joint activities the European Economic and Social Committee adopted in 2013 an opinion by which it called for the promotion of coordinated European action to prevent and combat energy poverty, strengthening solidarity in this area and better protection of vulnerable citizens (EU and third countries). We support the proposal of the EESC to establish a European fund for energy solidarity, to support initiatives of Member States or local communities for financial support for: paying bills (social tariffs for electricity vouchers etc.), centres for the training of advisers on energy efficiency, rehabilitation of residential districts, technical assistance for activities related to energy efficiency.

1.4. ESC focuses on three main factors that undoubtedly determine the forefront placement of Bulgaria in terms of energy poverty - outdated and energy inefficient residential buildings, very low in absolute and real terms incomes and dynamically increasing energy prices. With the elaboration of this opinion the ESC aims to contribute to the intensification of the public dialogue and to step up the adoption of appropriate policy actions.

1.5. The low purchasing power of the incomes of Bulgarian households raises the question of disproportionate energy prices. Although the price of electricity in Bulgaria is the lowest in the EU, it is proportionally higher relative to income.

1.6. The consequences of this situation are that Bulgaria is experiencing very serious difficulties in securing affordable and sustainable energy services, particularly with regard to low-income households. Therefore, (the acute imbalance between income and electricity prices and in conjunction with the forthcoming liberalization of prices) is a very serious risk for the country's impoverishment and backwardness compared to other Member States to continue and increase in the coming years.

1.7. The European Commission has expressed serious criticism on the energy policy of Bulgaria in its first annual report on the state of the European Union energy and progress over the last nine months of 2015. Bulgaria is listed as the most vulnerable country in terms of

energy poverty. The report notes that according to unofficial data, the share of households whose energy costs exceed 10% of their budget exceeds 30%. This means that much of the population is at risk of poverty and cannot keep their homes sufficiently warm[2].

1.8. Therefore, ESC agrees that regardless of the experience in the energy support current policy that does not differentiate and target the different groups of users, is not able to solve the serious problems of energy poverty and access to energy of vulnerable consumers. Measures to reduce energy poverty and social protection schemes in support of vulnerable consumers must be improved, upgraded and expanded according to the needs of a flexible approach and new tools.

1.9. Considering that the process of liberalization of energy prices is an urgent commitment of the government, ESC is concerned that it is unclear what will be the specific dimensions of liberalization and the consequences of it and insisted on organizing an information campaign to combat energy poverty to develop solidarity, to promote awareness of energy efficiency, conversion of citizens into active energy consumers, responsible behaviour and commitment of industry, etc.

1.10. It is imperative to develop and adopt a Bulgarian national definition of "energy poverty" which the maximum extent reflect the real state of the problem at the three main factors - energy prices, incomes and the state of housing.

1.11. ESC insists that in order to ensure adequate protection of vulnerable citizens at risk of energy poverty, it is necessary to undertake and improve policies and measures in the following areas:

1.11.1. Constant monitoring of "vulnerability" and energy poverty, information assurance, with a focus on developing local and international projects, exchange and adoption of best practices, social impact assessment of specific measures and policies, the training of citizens and carrying out information campaigns.

1.11.2. Using a mix of instruments and mechanisms to prevent and combat energy poverty, including increasing the scope and extent of energy assistance, targeted government policies, diversification of the supplies, negotiation of preferential rates with regional suppliers, reduction excise duties and VAT rates for certain energy, subsidized prices for supply and installation of "smart meters" for vulnerable consumers, creating energy fund to ensure continuity of energy supply in case of difficulty in paying bills during the heating months, especially for vulnerable customers .

1.11.3. Improving residential buildings, increasing energy efficiency and introducing new standards in key priorities - the use of Structural Funds determining the standard threshold of thermal insulation for rental housing, introducing tax incentives to owners investing in energy efficiency and saving energy based on issued certificates for the energy performance of buildings.

[2] State of the Energy Union {COM(2015) 572},18.11.2015.

1.11.4. Initiatives aimed at institutional and legislative changes, incl. strengthening of the energy regulator by empowering it with a clear mandate in the context of liberalization of energy prices, considering the need for energy ombudsman, stimulating the formation and functioning of energy cooperatives within the social economy.

2. INTRODUCTION

2.1. The problems of energy poverty in Bulgaria have not been the subject of specialized opinions of the Economic and Social Council. Expressing understanding that the primary function and care of the state is improving the quality of life of every Bulgarian citizen and ensuring adequate social protection for vulnerable groups, ESC believes that the forthcoming liberalization of energy prices is associated with serious challenges to public policies.

2.2. The Economic and Social Council of Bulgaria recognizes that the process of liberalization of the Bulgarian energy market is an inevitable consequence of the Third Energy Package of the EU (Regulation containing 3 and 2 Directives[3]) and of the commitment of our country, albeit belatedly, to finish its implementation by the end of 2015

2.3. The philosophy of the regulatory package is based on the idea that the secure supply of electricity and natural gas is essential for the development of the European society, the implementation of a sustainable policy on climate change and the promotion of competitiveness within the internal market. The main objective is to develop competition in energy markets, creating a competitive European energy market that is able to guarantee to European citizens - consumer choice, fairer prices, cleaner energy and security of supply.

2.4. Directives on energy markets establish common rules for the production, transmission, distribution and supply of electricity and natural gas, as well as provisions on consumer protection, the goal is improving and integrating competitive electricity markets in the Community. The Directive lay down rules relating to the organization and functioning of the energy sector, open access to the market, the criteria and procedures applicable to calls for tenders, the granting of authorizations and exercising control over systems. They also settle obligations to provide universal service and users' rights in electricity and natural gas, and clarify the requirements regarding competition.

2.5.In order to ensure the transposition of the package into Bulgarian legislation, changes were made to the Energy Act (Art. 30, paragraph 1), according to which energy prices, natural

[3] Regulation (EC) № 713/2009 of the European Parliament and of the Council of 13 July 2009 establishing an Agency for the Cooperation of Energy Regulators;
Regulation (EC) № 714/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the network for cross-border exchanges in electricity and repealing Regulation (EC) № 1228/2003;
Regulation (EC) № 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to gas transmission networks for natural gas and repealing Regulation (EC) № 1775/2005;
Directive 2009/72 / EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in electricity and repealing Directive 2003/54 / EC;
Directive 2009/73 / EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in natural gas and repealing Directive 2003/55 / EC.

gas and energy services businesses will not be subject to regulation by CEWR, so long as there is competition, i.e. each user has a choice of energy supplier in an environment of fair competition.

2.6. Regardless of the preparatory work done, ESC is concerned that it is unclear what will be the specific dimensions of liberalization and the consequences of it. There is no impact assessment, and some energy experts claim that that initially prices will rise by 15-20%. The lack of an information campaign at the same time is an additional precondition for serious concern and anxious expectations.

2.7. In this regard, we consider very important the recommendation of EESC regarding the need to organize a European information campaign to combat energy poverty and to develop solidarity in this area which is to be specified at national and local level to promote awareness of energy efficiency of conversion of citizens into active energy consumers, responsible behaviour and commitment of the industry and others.

2.8. ESC focuses on three main factors that undoubtedly determine the forefront placement of Bulgaria in terms of energy poverty - outdated and energy inefficient residential buildings, very low in absolute and real terms incomes and dynamically increasing energy prices. The impact of the latter factor will become more and more visible in the increasingly high preferential prices for purchasing electricity from Hydroelectric Power Stations - Thermal Power Stations - previously "Maritsa East" 1 and 3, and combined energy production. The envisioned preferential prices, in some cases, exceeding more than twenty times the price of the Nuclear Power Plants, constitute unacceptable distortions in the Community market and incompatible state aid according to the requirements of the EU and will lead to massive job losses and worsen significantly the general purchasing power and standard of living.

3. THE EUROPEAN CONTEXT OF ENERGY POVERTY

3.1. There is no EU-wide definition of energy poverty, nor uniform measurement criteria, although many organizations and institutions (including EESC) has urged the European Commission to develop a single definition. Some Member States have different approaches in determining the energy poverty.

3.2. At the same time, there are many European documents outlining the requirements for states to formulate a definition of "energy poverty". The provisions of Art. 3, item 3 of Directive 73/2009 concerning common rules for the internal market in natural gas, Member States are expected to define the concept of "vulnerable customers", namely: *"Each Member State shall define the concept of" vulnerable customers "which may refer to energy poverty and, inter alia, to the prohibition of disconnection of gas to such customers in critical times.*

3.3. In this regard, in a working paper from 2010 EC recommends to the Member States to formulate a definition of "vulnerable customers" based on their specific national characteristics, ensuring a high level of protection. ESC believes that in order to create a definition of "energy poverty" suitable to the Bulgarian conditions, it is necessary to consider

existing definitions used in Europe. In its opinion, EESC[4] offers its definition as *"social status, determined by external (price of energy, energy efficiency of housing, etc.) and internal factors (aging, income, etc.)."* It is manifested as *"difficulty or inability to maintain an adequate temperature in the house and enjoy other essential energy services at a reasonable price"*. EP resolution of 22 May 2012 emphasizing the temporary nature of fuel poverty households, namely "*temporary helplessness resulting from the difference between their individual state and characteristics and surroundings*".

3.4. When considering the few existing national definitions, what stands out is the one used in the UK which defined energy poverty as *a situation where a household has to allocate over 10% of their income in order to achieve a satisfactory level of heating in your home*. The French definition (the law "Grenelle II") defines energy poverty as a situation in which "*a person ... feels serious difficulties to receive in their home energy supplies needed to meet its basic needs due to insufficient funds available or unfit housing conditions*".

3.5. ESC expresses its concern, emphasised in many analyses and assessments, that energy poverty is a growing problem in Europe and Bulgaria and threatens to become even greater in the future.

3.5.1. Examining the state of energy poverty in the EU commissioned by the European Commission (data for 2012) indicate that over 54 million people in Europe can be defined as energy-poor - almost 11% of European households are unable to adequately heat their homes at an affordable price.

3.5.2. Against the background of high levels of groups at risk of poverty and social exclusion domestic consumers everywhere are facing serious problems in terms of unaffordable energy costs.

3.5.3. Data show that since 2004 fuel prices in the EU have risen by over 70% in real terms, a rate higher than that can be offered by any program for energy efficiency[5].

3.5.4. The forecasts are not optimistic. Fuel prices will most likely continue to increase, while troubling change to regressive tax based policies that apply levies to utility bills of households. The general expectation is that the number of disadvantaged users will probably continue to increase, if adequate measures are not taken.

3.5.5. Although the problem can be traced anywhere in the EU, the situation with energy poverty is the most severe in Central, Eastern and Southern Europe. Numerous international studies over the years repeatedly warned that "increasing energy prices will inevitably become a serious social problem for the region from Eastern Germany to the new member states, especially those with very low disposable income, such as Bulgaria, Romania, Hungary and Poland[6]."

[4] TEN/420

[5] Tackling Fuel Poverty in Europe: Recommendations Guide for Policy Makers, September, 2009

[6] Regions at Risk of Energy Poverty (ESPON & Innobasque, 2010); Boardman, B. (2010b) Liberalisation and fuel poverty. In: Rutledge, I. and Wright, P., ed. 2010; UK Energy Policy and the End of Market Fundamentalism. Oxford: Oxford University Press. Chapter 9.; Fuel Poverty; 1991 – 2012

3.6. At the same time, ESC notes with satisfaction the efforts of the EU and of various institutions and organizations to strengthen their attention to the problems of energy poverty and vulnerable consumers:

3.6.1. The European Parliament resolution of 14 March 2013 on Energy Roadmap 2050 for the first time included a social dimension and supported the need for social dialogue involving all stakeholders; called for the protection of consumers through price transparency and information and asked Member States to report regularly on actions taken to protect households from rising energy bills and energy poverty.

3.6.2. With time, energy poverty is gradually entering the mainstream of European policies as it passes from indirect to direct action policies. As early as in 2008, the European Parliament called on Member States to "establish national plans for energy action aimed at energy poverty" and "to invest as a priority in comprehensive energy efficiency measures for low income households, thereby addressing strategic simultaneously problem energy poverty and energy efficiency target in 2020".

3.7. In this regard, ESC supports the active position of the EESC regarding the necessary measures and actions to tackle energy poverty.

3.7.1. In its special 2010 opinion on the subject EESC emphasizes the need to protect vulnerable consumers, in order to avoid deepening energy poverty[7]. Its recommendation to the EC is that the fight against energy poverty should be a social priority and to develop common guidelines for Member States.

3.7.2. ESC suggests that the EC should adopt a common general definition of energy poverty, understood as the difficulty or inability to maintain an adequate temperature in the house and enjoy other essential energy services at a reasonable price. For the determination of what is understood as sufficient temperature in the house used the WHO definition of a suitable temperature in the living room of 21ºC, and in other areas - 18ºC.

3.7.3. EESC notes that there is not enough standardized information and considers it appropriate to establish a European Observatory of Energy Poverty, which includes all economic and social actors that are directly or indirectly related to the problem of energy poverty.

3.7.4. EESC also believes that for finding a solution to the problem of energy poverty it is essential to develop policies aimed at low-income social groups, but also at improving energy efficiency in construction.

3.7.5. Based on the recommendations of the EP on joint activities, EESC adopted in 2013 a new opinion[8] which calls for the promotion of coordinated European action to prevent and combat energy poverty, strengthening solidarity in this area and better protection of

Commemorating 21 years of action, policy and research (Ryan Walker, Harriet Thomson & Christine Liddell (University of Ulster, University of York).

[7] EESC/14/6/2010, p. 2 Energy poverty in the context of liberalization and the economic crisis.

[8] EESC/18/09/2013, p. 2 "Towards coordinated European action to prevent and combat energy poverty ".

vulnerable citizens (EU and third countries). The opinion calls for European energy security commitments aimed at:
- protecting citizens from energy poverty and preventing social exclusion;
- taking action to reduce the structural factors leading to vulnerability (ensuring basic access to energy at reasonable and stable prices);
- encouraging everyone to assume their responsibilities in relation to the use of energy from renewable and sustainable sources (thus providing a transition to low-carbon society).

3.7.6. EESC proposes establishing a European fund for energy solidarity, to support initiatives of Member States or local communities for financial aid to pay bills (social tariffs for electricity vouchers etc.), training centres for advisers in energy efficiency, rehabilitation of neighbourhoods, technical assistance for activities related to energy efficiency. It stresses the need for the Structural Funds in the 2014-2020 programming period to provide more resources in this direction.

3.8. ESC also believes that existing Directives and EU legislation relating to three areas can stimulate national action in the field of energy poverty. In particular they are:

- energy (directives and legislation related to the internal market in electricity and gas, incl. requirement for appropriate measures to protect end-users, improvements in energy efficiency standards for new construction work and repairs);

- protection and rights of energy consumers (directives and legislation related to the transparency of prices, contracts and information);

- health and energy poverty (some legislation on the importance to poor housing conditions, quality requirements, availability and affordability of housing).

3.9. Along with identified achievements, however, ESC believes that progress is slow and active measures are needed at the national level, in particular, and especially in countries like Bulgaria, which are affected by the problem under consideration.

4. ENERGY POVERTY IN BULGARIA

4.1. The reasons for and the current state of energy poverty in Bulgaria

4.1.1. Annual final electricity consumption per capita in households in Bulgaria has increased by about 20% since 1990, reaching 124 kg of oil equivalent (kg o.e.)in 2013 By this indicator Bulgaria does not differ significantly from the EU-28 average of 141 kg o.e. /2013/ However, the total final energy consumption per capita in households in Bulgaria is approximately two times lower than the average in the EU-28, respectively 308 kg o.e. and 586 kg o.e. in 2013.[9] It should be emphasized that Bulgaria has no in-depth, targeted and consistent research to provide objective analysis of the structure of energy poverty. However, different emphases in national and international research outline a too alarming picture.

[9] See: Energy, transport and environment indicators, 2014 edition. Eurostat pocketbooks. p. 86, 88.

4.1.1.1. A new European Commission Communication indicated once again that "Bulgaria is considered the most vulnerable country in the EU in terms of energy poverty." In particular, within the population at risk of poverty, the majority is not able to maintain adequate temperatures in their homes. The other two indicators (unpaid utility bills, homes with leaks and damp walls) also show alarming figures[10].

4.1.1.2. According to a survey of energy poverty in the EU made in 2010,[11] Bulgaria is the country with the highest levels, and quite far ahead than other Member States, in terms of the combined indicators (inability to keep the home warm, disproportionately high costs for housing, improperly isolated homes, unpaid utility bills). Research from 2012[12] restates the fact that 70% of households in the country cannot afford to keep their homes warm.

4.1.1.3. Research from 2010 of the Institute of Sociology[13]focused on the financial crisis and indebtedness in Bulgaria, found that the country's debt is often the result of a growing gap between incomes and prices for services of general interest (electricity, water and heating). The survey found that the reasons for borrowing money are most often associated with the need to pay "utility bills and living costs". It stresses that, unlike Bulgaria, where the share of total household expenditure on utility services in 2008 was 13.6 percent, in the 8 post-socialist countries that became EU Member States in 2004, it was 9.1%.

4.1.1.4. According to Eurostat data, in 2014 over 35.3% of Bulgarian citizens have overdue payments (mortgage or rent, utility bills or leasing payments) 32.9% of the total population have overdue utility bills, 52.9% of those with income below 60% of the median equivalent income[14]. According to the same data, those who cannot keep their home warm enough are 40.5% and the corresponding share among people with income below 60% of median equivalent income is 66%. This share is too high compared to the EU average and far above other European countries.

4.1.1.5. Data from Eurostat Survey of Income and Living Conditions(SILC) show that 40.1% of our population is at "risk of poverty and social exclusion", compared to an average of 24.4% for EU-28. In Bulgaria 33.1% of the population lives in conditions of severe material deprivation and the country occupies a leading position in this indicator compared to other EU-28 countries. After Bulgaria rank: Romania (26.3%), Hungary (23.9%) and Greece (21.5%), while the average for the EU-28 is 8.9%.

4.1.1.6.Compared to 2009 the share of persons who limit the heating of their homes due to the lack of funds is increasing - if in 2009 the share of such persons was 33.5% of the entire population comprising 2,532,251 persons, in 2014 it reached 2,931,557 persons**[15]**or 40.4% of the population. The relative share of expenditure on housing, water, electricity and fuel for

[10] State of the Energy Union {COM(2015) 572},18.11.2015.
[11] Bouzarovski, St., Energy Poverty in the EU: a review of the evidence, University of Birmingham, 2011.
[12] Consortium INSIGHT_E.
[13] The financial crisis and indebtedness of Bulgarians, Ed. D. Dimitrov, Sofia, 2010.
[14] Equivalent income is determined based on an equivalent scale to Eurostat, as follows: 1 for the first adult member of the household; 0. 5 - for the following members; 0.3 - for children below 14 years of age.
[15] NSI, "Statistics on Income and Living Conditions" (EU-SILC).

domestic use among groups with monthly income per person up to BGN 270 is 16.5-17%; and among those with monthly income per person between BGN 271 and 390, is between 15.9% and 15.2%. Particularly affected are the poorest four deciles of the population, the families of pensioners, those unemployed and the economically inactive.

4.1.2. The low purchasing power of the incomes of Bulgarian households raises the question of disproportionate energy prices. Although the price of electricity in Bulgaria is the lowest in the EU, it is proportionally higher relative to income.

4.1.2.1. The dynamics of energy prices outpaced the dynamics of basic earnings and is widely recognized that the reforms during the period of transition led to a significant increase in energy prices for domestic users. As Buzarovski points out: "Electricity prices have increased since 1998 ; since 2001 there is a 10% increase in prices of daily electricity; since 2001 rates increased almost every year as part of the agreement between the World Bank and the Government of the Republic of Bulgaria; by 2005 electricity prices for households for day consumption have doubled compared with their levels in 2002; there are limited reforms in the natural gas sector; the prices of natural gas and heat have been subjected to significant increases in recent years."

4.1.2.2. For the period 2007-2014 the general price level (CPI) increased by 26.1%, with a significant contribution to this growth with rates of price increase of five energy groups, and some of them significantly outpacing the general price level. The group of fossil fuels for example increased by 38.3%; gaseous fuels - by 39.1%; liquid fuels for household purposes - by 35.6%; heating - by 29.4%; electricity - by 20.7%.

4.1.2.3. In comparison with EU countries, the price of electricity for household consumers in Bulgaria is the lowest, however, the growth rate for the period 2007-2015 [16] has reached 34.5% and significantly exceeds that in many countries such as Hungary (4.9%), Cyprus and the United Kingdom (respectively 5.2% and 8.0%) and almost two times higher than levels in Denmark (19.3%) and Germany (19.0%). The result is that the comparison between Bulgaria and the United Kingdom proved that "people living in the poorest region in Bulgaria and one of the poorest in Europe (North-western Bulgaria) earn less than 12% of the median income in London - measured in purchasing power standard which takes into account different price levels - but the ratio for 100 kWh is 17.07 for Bulgarians and 15.37 for Londoners[17].

4.1.2.4. The increase in the prices of the energy group of utilities is the most important cost item for the Bulgarian low-income households. Due to the low degree of elasticity of this expenditure, it is practically impossible to direct more funds towards health, education, leisure, transport, etc.

4.1.3. Surprisingly, NSI data on electricity prices for households for the period January-June 2015 confirm a trend for households with low consumption to pay a higher price: households whose annual consumption is very small (up to 1000 kWh) and small (between 1000 and 2500 kWh) pay more for 1 kWh compared to households with very big year consumption

[16] NSI, energy prices by type of customer, average household size in Euros for kWh.
[17] Regions at Risk of Energy Poverty (ESPON & Innobasque, 2010).

(over 15 000 kWh) - respectively BGN 0.190 for the former and BGN 0182 for the latter, including all taxes, fees and VAT.

4.1.4. The low amount of income definitely has a major influence on the choice of a source of heating. In 2011 the share of heating electricity makes up 40% for the total energy consumption, 32% of biomass (firewood), 9% of coal, 16% central heating and 1-2% of gas[18]. There is a tendency low-income households to switch to heating with wood and coal, which is a clear measure of energy degradation.

4.1.5. As regards the quality of the buildings there are also problems with outdated buildings, the presence of a large share of prefabricated housing and poor living conditions of certain population groups. Experts of the International Association for Energy Economics[19] stated that according to the National Programme for Renovation of Housing in Bulgaria, adopted in 2005, over 20% of the buildings are prefabricated, most of them need renovation. In Bulgaria there are about 18 900 prefabricated blocks of flats with 707,096 flats in which live about 1.7 million people. The life expectancy of multifamily blocks of flats is about 50 years, a significant portion of these buildings no longer meet the required technical standards. According to the assessment of the Ministry of Regional Development and Public Works, 10% of such panel buildings need urgent repair[20]. Based on data of the NSI other organizations[21] found that about 50% of housing in Bulgaria was built before 1970, and 83.6% - before 1990. "All these buildings are extremely energy inefficient and enhance energy poverty."

4.1.6. Based on these data ESC considers that Bulgaria has alarming problems with the three key factors that are the main generators of energy poverty: low household income, poor condition of the housing stock and disproportionately high energy prices.

4.1.7. The consequences of this situation are that Bulgaria is experiencing very serious difficulties in securing affordable and sustainable energy services, particularly with regard to low-income households. Therefore, (the acute imbalance between income and electricity prices and in conjunction with the forthcoming liberalization of prices) is a very serious risk for the country's impoverishment and backwardness compared to other Member States to continue and increase in the coming years.

4.2. Condition of policy measures against energy poverty in the country

4.2.1. With a view to reducing energy poverty from the beginning of the transition period in Bulgaria, the Ministry of Labour and Social Policy, within the provisions of the *Social Assistance Act,* has been developing a programme to support vulnerable households through the provision of social assistance for heating for the months from November to March.

4.2.1.1. This programme is an instrument to soften the shock from rising energy prices, but it involves short-term effects and does not change the status quo, neither does it deal with the

[18] REACHReport on the situation in Bulgaria in terms of energy poverty, Kisyov, P.,p. 17.
[19] Peneva, T., Energy Poverty: The Bulgarian Case, International Association for Energy Economics.
[20] National Housing Strategy, Ministry of Regional Development and Public Works.
[21] Kicev, P., REACH.

causes that led to this condition. The programme's budget is directly dependent on the capabilities of the state budget. The existing system for energy aid is woefully inadequate to cover all those in need of targeted support for the heating of poor households. The process of liberalization of energy prices will exacerbate the problems of energy poverty if adequate measures are not taken to assist households in energy poverty.

4.2.1.2. The effect on the financial situation of households due to the allocation of funds under the program is too small due to the relatively small amount of the offered aid. For the past five years the amount of social benefits has increased by 30.7% (from BGN 276.15 in 2009/2010 to BGN 361 in 2014/2015) but remains too small as a share of consumption to maintain adequate thermal comfort. On the other hand, during this period the number of disbursements decreased by 1.7%, and this shows that the increase in size at the expense of limiting the number of households. Ultimately, the targeting of the programme fails to lead to a real reduction of the effects of energy poverty.

4.2.1.3. A key indicator for calculating the volume of social payments is still the guaranteed minimum income (GMI), as compared to its calculated level of differentiated minimum income, which depends on the amount of social payments. The size of the GMI is 65 lev and has not been changed since 2009. To achieve greater efficiency and protection of energy poor households it is necessary to increase GMI, which will increase the amount of funds disbursed for social assistance to the poorest citizens in the country.

4.2.1.4. The large proportion of rejected requests for heating benefits is an indicator of difficult access. For the last heating period 2014/2015 levels of 15% are reported, this proportion usually fluctuates between 16 and 18 percent, but in some cases (such as the heating season 2010/2011) it reaches up to 26% refused requests. The reasons for the refusals include slightly exceeding the required income due to the sale of land properties, other real properties, etc. For poor households these are incomes which cover certain needs for a certain period of time, but do not mean that they have changed their living conditions and improved their living standard. It is not uncommon for applications to be refused due to the lack of the required minimum of six-month regular registration at the employment office. The group of unemployed is one of the risk groups and in this respect the factor of unemployment has an increasing impact on the scale and level of poverty and this is mainly due to the consistent policy of the rights and the size of social benefits and unemployment benefits.

4.2.1.5. In Bulgaria in 2014 below the poverty line (BGN 323.75)[22] live 1,578,300 persons. For the surveyed period 254 998 households have received benefits, which means that only about 38.8 percent of the energy poor persons have received assistance for heating (at 2.4 members per household). Therefore, the approach used in the selection of households receiving heating subsidies is too restrictive. According to the World Bank report, in 2013 in Bulgaria only 7% of a total of 20% of the poorest households have received a guaranteed minimum income (GMI)and only 18% of them have received heating benefits (although the coverage of these programmes has improved slightly since 2010: 4.5% for GMI and 13% for

[22] NSI, "Statistics on Income and Living Conditions"(EU-SILC).

energy benefits). The World Bank stated that "although GMI and heating benefits are well targeted to the poor, the low coverage, combined with the modest size of these benefits, significantly reduce their impact on poverty and inequality."

4.2.2. Due to this situation, ESC shares the view of many international and national assessments, that the policy framework in the country is fragmented and focused on short-term measures to support many persons with low-incomes, rather than long-term measures for energy efficiency. This framework does not address adequately neither the causes of poverty, nor does it link with other social indicators, nor does it find interconnection with other areas, such as deforestation for example[23]. The measures are residual and remedial instead of long-term and preventive. Research on the topic is sparse, politically correct and inadequate, for example there is no adequate and meaningful definition, no evidence of health damage, no evidence of inequalities in the use of energy, etc.

4.2.3. Therefore, ESC shares the view that despite the achievements, the current policy is not able to solve the serious problems of energy poverty and energy access for vulnerable consumers. As recommended by the European Commission in relation to Bulgaria, "measures to reduce energy poverty and social protection schemes in support of vulnerable consumers should be improved"[24].

4.2.4. Expert evaluations suggest that in Bulgaria there are no targeted residential energy efficiency programmes for vulnerable households. Housing in the country is assessed as underdeveloped and poorly coordinated. State institutions that traditionally have a strong institutional role in setting social policy focus on ensuring minimum life support only for people with very low incomes, there is no interest in the long-term dimensions of energy efficiency. It also reported that the several credit programmes for energy efficiency in multifamily buildings, which were applied in the country in recent years, have not been successful. The process of refurbishing building by means of crediting is slow and is not applied if 5% of households in the building are poor[25]. This is seen as a major obstacle to the widespread use energy efficiency programmes funded by means of bank credits. Poor households cannot afford the additional costs and cannot invest in energy efficiency. This leads to a vicious circle: energy poverty itself becomes an obstacle to energy efficiency programmes. For the housing sector it is extremely important to develop sustainable and affordable financing programmes;

4.2.5. ESC share the opinion of the World Bank that Bulgaria urgently needs reforms, such as strengthening of the energy regulator to restore confidence and reinvigorate growth in the short term. On the basis of positive steps in this direction, indicated by the World Bank (as intensification of actions and ensuring more effective and informed regulation; increasing the independence of the regulator by having its members be elected by the National Assembly; improving transparency by making its meetings public and open), ESC believes that in the

[23] Fuel Poverty; 1991 – 2012, Commemorating 21 years of action, policy and research *(*Ryan Walker, Harriet. Thomson & Christine Liddell (University of Ulster, University of York).
[24] State of the Energy Union {COM(2015) 572},18.11.2015.
[25] Peneva, T., Energy Poverty: The Bulgarian Case, International Association for Energy Economics.

context of a liberalizing market it is necessary to ensure adequate strengthening of the regulator and its vesting with clear powers.

5. SURVEY OF FOREIGN PRACTICE – IMPLEMENTED MEASURES FOR COMBATING ENERGY POVERTY

5.1. Different EU Member States pay different attention to the problems of energy poverty and implement various measures to deal with it. ESC believes that Bulgaria can borrow useful lessons in this area from other EU Member States.

5.2. The greatest experience in this regard seems to be that of the UK, where there are established traditions in surveying and implementing political measures against fuel (energy) poverty:

- there is a long-established academic tradition in the field of systematic research on the issues;

- there is an officially accepted definition, according to which households live in fuel poverty if it is necessary to spend more than 10% of their income to maintain an adequate level of warmth in their homes. For this purpose, household needs for fuel are assessed in accordance with fuel prices. If the ratio of the so modelled fuel costs is greater than 10% of the income, the respective household is defined as the energy poor;

- there is a wide range of policy measures related or purposefully engaged with energy poverty. There are grants for various vulnerable groups (including unconditional and automatic ones for the elderly) during the winter and supplementary ones in case of very cold weather; counselling on the social tariffs is provided; there are flexible schemes for users with overdue payments; there is a hotline "warm home"; a safety net is built against the exclusion of vulnerable consumers, etc.[26] Along with this there are also a number of measures to improve energy efficiency, such as grants for free home insulation, unconditional for people above 70 years of age, support for all households who are entitled to aid, the initiative "Green Deal" aimed at wide range of households; there are mortgages with zero interest, etc.[27]

- there is also an extensive network of governmental and non-governmental organizations working in the field which have the opportunity to influence the decisions.

5.3. Other EU Member States use different definitions of energy poverty. A study of regulatory authorities found that a group of countries (France, Greece, Malta and Romania) use a certain threshold and if the household income is below the threshold, they are considered energy-poor. For France, this means that these households qualify for a special tariff; in Greece in this category fall users who consume little electricity; in Romania the income threshold equals the minimum wage. Another type of criteria used in some countries (Belgium, Romania, Slovenia and Spain) are based on health problems, old age or socio-

[26] Tackling Fuel Poverty in Europe: Recommendations Guide for Policy Makers, September, 2009.
[27] Fuel Poverty; 1991 – 2012: Commemorating 21 years of action, policy and research (Ryan Walker, Harriet Thomson & Christine Liddell (University of Ulster, University of York).

economic status. Estonia supports individual consumers that are beneficiaries to social assistance under the Social Assistance Act, or families whose monthly net income, after deduction of the fixed permanent expenditure, determined under the same Act, is below the subsistence minimum. The level of maintenance is determined based on the minimum expenses made on consumption of foodstuffs, clothing, footwear and other goods and services that meet basic needs.

5.4. Individual Member States undertake various measures to address energy poverty, for example:

- Social support and consumer protection (Belgium, France, Cyprus, etc.);

- Social tariffs or social bonus (Italy, Spain, etc.).

- lower VAT rate for prefabricated housing using central heating (Hungary - 5% compared with 25% for other goods and services);

- Special measures that prohibit the interruption of electricity supply (Finland and the Netherlands);

- Improvement of the existing heating system of the house owners with low incomes (France, national programme "HabiterMieux").

5.5. There are also other proposed measures:

5.5.1. Mortgages with zero interest to increase energy efficiency;

5.5.2. Approach to create lower-carbon zones focused on the worst housing and the poorest people. It is believed that such an approach can offer significant economies of scale and with the participation of community and neighbourhood networks will ensure that all households, even the hidden energy poor will be included[28].

5.5.3. Schemes to scrap old, inefficient appliances in low-income households and their replacement with new appliances;

5.5.4. Personal carbon quotas allowing the opportunity for poorest households to sell part of it to richer households. Wealthy consumers consume much more energy than is sustainable, while low-income consumers too often reduce their anyway modest energy use and live in cold homes. The idea is to build an energy market that rewards those who consume less energy, to ensure that energy is not wasted in energy inefficient homes to ensure equal access to energy services and to address barriers to equal access to faced by many users in a vulnerable situation.

5.5.5. The International Energy Agency conducted extensive research programme for "non-energy benefits of energy efficiency." Cambridge Econometrics has conducted a study that compares the investment in the basic energy efficiency programme focused on energy poverty in the United Kingdom with other potential fiscal stimulus packages, such as investment in infrastructure projects or tax reductions. The study found that the package on energy

[28] Op cit.

efficiency is the most cost effective method to drive the economy forward. This package reduces gas imports, releases available income to be used for other goods and services and creates jobs - mostly in local economies - in an industry that operates under capacity.

5.5.6. Alternative measures are linked with an approach based on minimum income standards that calculate the minimum income needed for different types of households, in order to ensure participation in society. According to this approach, a household will benefit from measures against energy poverty, if after covering all other minimum living expenses and housing costs, it lacks sufficient residual income to meet its expenses for necessary energy. This approach is consistent with the idea of a minimum level of social protection, promoted by the ILO.

5.5.7. Another policy that can alleviate the burden of high energy costs is the use of "smart meters". It is known, however, that product policies driven by the introduction of EU labels and minimum standards, although in time they provide significant energy efficiency improvements, do not benefit the energy poor because they cannot afford to buy such new equipment.

5.6. ESC believes that the extremely diverse foreign experience in policies, measures and instruments can be summarized in six directions and they should be used in developing national programmes to reduce and prevent energy poverty (see Appendix 1):

5.6.1. Energy efficiency in households: It is essential that housing be energy efficient. Some countries are making efforts to equip and train needy residents. So that they are able to achieve higher standards and easier regulation of buildings.

5.6.2. Financial support: financial support targeted by social policy may be needed for households that have a shortage of money. Grants range from subsidies to tax cuts, offering special rates or eliminating interest on late payments.

5.6.3. Customer protection: It is important that vulnerable customers are protected from the lack of competition, poorly functioning markets or lack of payment methods and to receive assistance in the reporting of irregularities.

5.6.4. Information and participation: A partial obligation of the electricity supplier is to provide necessary information to its customers, but there are many other sources of information and useful tips. The lack of access to useful information makes consumer choice more difficult and the risk of making wrong decisions greater.

5.6.5. Sharing information between stakeholders: This means that energy providers can share and compare information. Thus making black lists of problems that must be prevented. The countries where such information is shared between suppliers include Britain, France, the Netherlands and Portugal.

5.6.6. Physical measures: These measures apply to vulnerable customers, not to be excluded from the energy system at critical moments - such as during cold weather or natural disasters. Some customers with health problems do need a constant supply of electricity and need confidence that electricity will not be stopped.

6. GUIDELINES AND MEASURES FOR PREVENTION AND TACKLING ENERGY POVERTY IN BULGARIA

6.1. ESC believes that in the context of a liberalizing market it is necessary to update urgently the National Energy Strategy adopted in 2011. And the development of a targeted national strategy to protect vulnerable consumers against energy poverty.

6.2. It is imperative to develop and adopt a Bulgarian national definition of "energy poverty" which the maximum extent reflect the real state of the problem at the three main factors - energy prices, incomes and the state of housing.

6.2.1. The indicators used in the First report on the state of the Energy Union can be used as a good starting point for drafting a definition of energy poverty[29]. They are:

- Difficulties to cover energy bills (overdue energy bills);

- Inability to maintain normal temperature in the house;

- State of the housing (leaks, cracks and other defects in housing).

6.2.2. The process of developing a definition of energy poverty should also take into consideration long-term social factors facilitating the emergence of energy poverty, chronic disease and disability, retirement and long-term unemployment, as well as the number of household members.

6.2.3. ESC draws attention to the need for systematic monitoring of indicators characterizing vulnerable consumers, where the risk of energy poverty is greater because of the greater likelihood of making incorrect market decisions. A study of European Commission [30]identifies three main factors:

-difficulties in obtaining and assimilating information;

- failure or inability to purchase, choose or access appropriate products; - vulnerable to misleading marketing practices.

These indicators will gain importance with the full liberalization of the energy market in Bulgaria.

6.3. ESC insists that in order to ensure adequate protection of vulnerable citizens at risk of energy poverty, it is necessary to undertake and improve policies and measures in the following areas:

6.3.1. Constant monitoring of the "vulnerability" and energy poverty, provision of information:

- Establishing a monitoring body (committee, expert council, or another structure) As part of a European network of coordinated policies (European Energy Observatory).

[29]State of the Energy Union {COM(2015) 572}.
[30]Consumer vulnerability across key markets in the European Union (EACH/2013/CP/08.

- Defining energy poverty in Bulgaria adopting criteria and indicators used in good European practices and adapting them to national specificities.

- Maintaining a database, developing local and international projects, exchanging and transferring best practices, making impact assessments of specific measures and policies.

- Training citizens and conducting information campaigns to increase public awareness.

- Encouraging active user behaviour and providing accessible information on the opportunities for energy savings and actual costs in a transparent, non-misleading and easy to understand way.

- Creating local community centres for counselling, guidance and technical assistance on energy efficiency for vulnerable consumers.

- Encouraging the role of trusted information intermediaries - such as consumer associations, local authorities, public institutions as a source of advice for effective household energy strategy. These organizations should work more closely with users to focus on the problems of households with lower incomes.

6.3.2. Using a mix of instruments and mechanisms to prevent and combat energy poverty:

- Increasing the scope and content of energy assistance, with a view to gradually limiting the contingent of vulnerable citizens, expanding access to guaranteed universal services.

- Developing instruments by means of which to identify persons actually in need of financial support, the amount of targeted energy assistance is directly dependent on the number and age of children and older people in the household and the residential area that is to be heated.

- Implementing best European practices: implementing the status of "protected customers", using social tariffs, electricity meters with prepaid cards, guaranteed supply of electricity vouchers, etc.

- Targeted government policies: diversified supplies, negotiate preferential rates with regional suppliers, reduced excise duties and VAT rates for certain energy sources.

- Subsidized prices for supply and installation of "smart meters" to vulnerable users, with a view to maximizing the usefulness and transparency of reporting consumption.

- Developing a national plan to support the replacement of appliances with high energy efficiency - such as voucher schemes.

- Introducing obligations on suppliers of electricity, gas and heat supply of specialized services for customers in a state of energy poverty, for example: free replacement of the commercial metering devices.

- Establishment of an energy fund to ensure continuity of energy supply in case of difficulty in the payment of bills during the heating months, especially for vulnerable customers.

- Together with this, and above all it is necessary to review income policies in the country and their simultaneous orientation towards adequate quality of life and economic recovery and growth.

6.3.3. Improving housing, increasing energy efficiency and introducing new standards:

- Using structural funds targeted more on combating energy poverty and the need for more funding for energy efficiency and renewable energy.

- Expansion of the government programme for the renovation of residential apartment blocks, to extend their lives, improve insulation and reduce energy costs for households.

- Defining the standard threshold of thermal insulation for rental housing and gradual withdrawal from circulation of rental premises not meeting this standard.

- Introducing tax incentives for owners investing in energy efficiency and energy savings based on issued certificates for the energy performance of buildings.

- A wide information campaign to explain the benefits of all stakeholders from Structural Funds programmes aimed at reducing the energy costs of residential buildings.

6.3.4. Initiatives related to changes in the legislation:

- Strengthening the energy regulator by empowering it with a clear mandate in the context of liberalization of energy prices.

- Considering the need for energy ombudsman in order to effectively protect the interests of consumers.

- Measures to strengthen regulatory oversight and establishing a mechanism for amicable settlement of disputes with energy suppliers and solving customer problems.

- Encouraging the formation and functioning of energy cooperatives in the social economy, a necessary complement to the deformed economic and social environment, which contributes to keeping the market elements in the economy of combining business profitability with the preservation of human capital, and complements the social safety nets[31].

(signed)

Professor Lalko Dulevski, Ph.D
PRESIDENT OF THE ECONOMIC AND SOCIAL COUNCIL

[31] See ESC Opinion on "Social Economy - Opportunities and Prospects for Development in Bulgaria", 2012

Appendix 1

Examples of instruments and practices implemented by EU Member States[32]

1. Energy efficiency of households.

Country	Measure	Website
Improving Housing Stock, Heating Systems and Household Appliances		
Energy efficiency subsidies	Austria	http://www.umweltfoerderung.at/kpc/de/home/allefoerderungen/#energiesparen
Subsidies for low-income home owners	France	http://www.anah.fr/habitermieux.html
Tax reductions for investments in energy saving	France	http://www.economie.gouv.fr/cedef/economie-energie-credit-dimpot
Supplier obligation to deliver energy efficiency improvements to domestic consumers	United Kingdom	https://www.gov.uk/energy-company-obligation
Energy efficiency subsidies	Greece	http://exoikonomisi.ypeka.gr/
Tax reductions for investments in energy saving	Italy	http://www.efficienzaenergetica.enea.it/edilizia/incentivi/
White certificates	Italy	http://www.gse.it/it/CertificatiBianchi/Pages/default.aspx
Energy efficiency measures for vulnerable consumers and social support NGOs	Portugal	http://www.edp.pt/pt/media/noticias/2013/Pages/EDPvaioferecertressistemasdemicrogeracaoaIPSSs.aspx
Home visits		
Free energy audits	Belgium/ Flanders	http://www.vlaanderen.be/nl/bouwen-wonen-enenergie/energie/energiefactuur/energiescan
Energy "tutors"	Belgium /Wallonie	http://gouvernement.wallonie.be/les-tuteurs-nergie
Social Housing and Incentives for Tenants and Landlords		
Mandatory energy performance certificate for each building	Austria	https://www.help.gv.at/Portal.Node/hlpd/public/content/21/Seite.210400.html
Landlords invest in energy efficiency measures	France	http://www.legifrance.gouv.fr/affichTexte.do;jsessionid=0A586CCEA18474FBCAC71A910767A1AE.tpdjo12v_3?cidTexte=JORFTEXT000021327445&dateTexte=20110920
Energy savings allowance for landlords	United Kingdom	https://www.gov.uk/landlords-energy-savingallowance
Prohibition to rent residential premises with energy performance rating lower than E on an Energy Performance Certificate	United Kingdom	http://www.scotland.gov.uk/Topics/Built-Environment/Housing/sustainable/standard
Covenant on Energy Saving in the Rental Housing Sector	The Netherlands	http://www.iut.nu/members/Europe/West/2012/WoonbondEnergyConvenant28_juni_2012.pdf

2. Financial support.

Country	Measure	Website
Electricity Assistance Fund	Austria	http://www.verbund.com/cc/en/responsibility/corporatecitizenship/electricity-assistance-fund
"Dare to compare" campaign to stimulate consumers to compare energy providers'	Belgium	http://economie.fgov.be/nl/consument/Energie/Facture_energie/durf_vergelijken/#.UkmK1eSy

[32] Citizens' Energy Forum – Vulnerable Consumer Working Group *Guidance Document on Vulnerable Consumers*, November 2013

contracts		HTo
Home maintenance support for families in need, ensured by local municipalities	Hungary	http://csaladitudakozo.kormany.hu/download/7/5c/60000/lakásfenntartási%20támogatás%202013.doc
Social support	The Netherlands	http://wetten.overheid.nl/BWBR0020031/geldigheidsdatum_11-10-2013
Winter and Cold Weather Payment		
Energy advice, replacement of old appliances and financial aid; the latest comprehensive policy instrument to cover energy needs and costs of low-income households and other eligible households	Austria	http://www.wien.gv.at/gesundheit/sozialabteilung/energieunterstuetzung.html
Warm home discount scheme	United Kingdom	https://www.gov.uk/the-warm-home-discount-scheme
Tariffs		
A limited amount of free electricity for each household	Belgium / Flanders	http://www.vreg.be/gratis-elektriciteit
social household tariffs	Greece	ttp://www.deddie.gr/default.aspx?id=31170&nt=19&lang=1
Discount for large families (3 or more children) on gas prices	Hungary	http://www.kormany.hu/hu/nemzeti-fejlesztesi-miniszterium/hirek/egyszerubben-juthatnakgazartamogatashoz-a-nagycsaladosok
Social tariffs for low-income families	Italy	http://www.autorita.energia.it/it/bonus_sociale.htm
Social tariffs	Portugal	http://www.edpsu.pt/pt/destaques/Pages/TarifaSocialeAsece.aspx
Social electricity tariffs	Spain	http://www.minetur.gob.es/energia/tur/bonosocial/paginas/bonosocial.aspx
Payment planning		
A licence requirement ensures that repayment plans reflect individual's ability to pay	United Kingdom	https://www.ofgem.gov.uk/about-us/how-we-work/working-consumers/supplier-performancesocial-obligations
Beneficial arrangements for paying electricity bills for vulnerable customers	Greece	http://www.deddie.gr/Default.aspx?id=61056&nt=19&lang=1
Deferred payment or payment in instalment for indigent consumers	Hungary	http://njt.hu/cgi_bin/njt_doc.cgi?docid=110829.245949
Law on debt management schemes by municipalities	The Netherlands	http://wetten.overheid.nl/BWBR0031331/geldigheidsdatum_16-10-2013

3. Protection

Country	Measure	Website
Electricityassistance fund	Austria	http://www.verbund.com/cc/en/responsibility/corporatecitizenship/electricity-assistance-fund
Independent energy Ombudsman	Belgium France, United Kingdom	BE: http://www.ombudsmanenergie.be/index.php?lang=fr; FR: http://www.energie-mediateur.fr/ GB: http://www.ombudsman-services.org/energy.html
Priority Services Register offers free services e.g. safety check of gas appliances	United Kingdom	http://www.adviceguide.org.uk/wales/consumer_w/consumer_energy_and_water_supply_e/consumer_energy_supply_e/consumer_help_if_youre_older_disabled_or_on_a_low_income_e/priority_services_register_for_older_and_disabled_people.htm
Procedures for resolving disputes between clients and suppliers through Hellenic	Greece	http://www.synigoroskatanaloti.gr/

Consumers' Ombudsman		
Additional services for people with disabilities	Hungary	http://njt.hu/cgi_bin/njt_doc.cgi?docid=110829.245949
Independent client ombudsman	Portugal	https://provedordocliente.edp.pt/
Selling methods		
Code of good conduct	Belgium	http://economie.fgov.be/fr/consommateurs/Energie/Facture_energie/Accord_protegeant_le_consommateur/#.UkmMEOSyHTo
Voluntary code of practice and sales agent register	United Kingdom	http://www.energyuk.org.uk/customers/energy-industry-codes/energysure-code.html
Voluntary code of good conduct against unfair practices	Italy	http://www.autorita.energia.it/it/schede/C/faq-contrattinr.htm
Voluntary code of conduct on providing information and fair selling	The Netherlands	http://www.energie-nederland.nl/gedragscode-consument-en-energieleverancier/
Energy supplier voluntary agreement with debt service organisations	The Netherlands	http://www.nvvk.eu/schuldhulpverlening/Convenanten
Consumer awareness		
Energy Best Deal Campaign	United Kingdom	https://www.ofgem.gov.uk/ofgem-publications/38138/energybestdealbookleteng2012.pdf

4. Information and engagement.

Country	Measure	Website
Hotline for energy consumers	United Kingdom	http://www.adviceguide.org.uk/england/consumer_e/consumer_energy_and_water_supply_e/consumer_energy_supply_e/consumer_choosing_and_switching_supplier_e.htm
Helpline for energy savings advice	United Kingdom	http://www.energysavingtrust.org.uk/Organisations/Government-and-localprogrammes/Programmes-we-deliver/Energy-Saving-Advice-Service
Suppliers have set up a Home Heat Helpline	United Kingdom	http://www.homeheathelpline.org.uk/
Consumer information and practical help on energy topics	The Netherlands	http://www.consuwijzer.nl/energie
Transparency		
Specimen bills	Austria	http://www.econtrol.at/de/konsumenten/strom/stromrechnung
Compulsory billing information (details for complaints, disputes, etc.)	France	http://www.legifrance.gouv.fr/jopdf/common/jo_pdf.jsp?numJO=0&dateJO=20120426&numTexte=31&pageDebut=07448&pageFin=07450
Voluntary code of practice to ensure accurate billing	United Kingdom	http://www.energyuk.org.uk/customers/energy-industry-codes/code-of-practice-for-accurate-bills.html
Priority Services Register offers free services e.g. large print and Braille bills	United Kingdom	http://www.adviceguide.org.uk/wales/consumer_w/consumer_energy_and_water_supply_e/consumer_energy_supply_e/consumer_help_if_youre_older_disabled_or_on_a_low_income_e/priority_services_register_for_older_and_disabled_people.htm
Compulsory billing information; bills include supplier/distributor contact details	Hungary	http://njt.hu/cgi_bin/njt_doc.cgi?docid=110829.245949;
Voluntary agreement with regulator to make energy bills understandable	The Netherlands	https://www.acm.nl/nl/publicaties/publicatie/5446/NMa-presenteert-richtlijn-voor-betereenergienotas/
Price comparison tools		
Tariff calculator	Austria	http://www.e-control.at/de/konsumenten/service-undberatung/toolbox/tarifkalkulator/tarifkalkulator-application?sav_ref=http://www.econtrol.at/en/consumers&js=1&sw=1600

Price comparison tools	Brussels Flanders Wallonie	http://www.brusim.be/ http://www.vreg.be/vergelijk-doe-de-v-test-en-vind-uw-ideale-leverancier http://www.cwape.be/?dir=2.1.02
Price comparison tool	Finland	www.sahkonhinta.fi
Free telephone information service and price comparison tool	France	http://www.energie-info.fr/
NRA Confidence Code for online price comparison sites	United Kingdom	http://www.goenergyshopping.co.uk/en-gb/help/comparison-sites
Price comparison and information related to electricity bills	Greece	http://www.rae.gr/site/categories_new/electricity/market/supply/invoice/info.csp?viewMode=normal
Examples of privately-owned price comparison websites	The Netherlands	http://www.DeEnergiegids.nl http://www.Energieleveranciers.nl http://www.Energieplaza.nl
Price comparison tools provided by consumer organisations	The Netherlands	https://www.consumentenbond.nl/energie/energie-ergelijken/?actioncode=EV_site_bespaar_vergelijker http://www.eigenhuis.nl/tools/Energie/energieprijzenvergelijker/
NRA price comparison tool	Sweden	http://www.ei.se/elpriskollen/
Collective switching		
Collective switching	Austria	https://www.energiekosten-stop.at/
Collective switching	The Netherlands	https://www.consumentenbond.nl/test/woninghuishouden/woning/energieleveranciers/energiecollectiefaanmelden/?actioncode=adwords&cid=sea_google_energie or http://www.eigenhuis.nl/webwinkel/energie/collectieve-inkoop-energie/
Single point of contact		
Single point of contact	Italy	http://www.autorita.energia.it/it/consumatori/reclami.htm
Free telephone information service and website including price comparison tool	Portugal	www.erse.pt

5. Transparency and information Sharing between stakeholders

Country	Measure	Website
Fuel Poverty Observatory	France	http://www2.ademe.fr/servlet/KBaseShow?sort=-1&cid=96&m=3&catid=25227
Government's Fuel Poverty Advisory Group	United Kingdom	https://www.gov.uk/government/organisations/the-fuel-poverty-advisory-group
The role of national regulatory authorities		
Consumer vulnerability strategy	United Kingdom	https://www.ofgem.gov.uk/about-us/how-we-work/working-consumers/protecting-vulnerableconsumers
NRA monitors suppliers' performance against social obligations	United Kingdom	https://www.ofgem.gov.uk/about-us/how-we-work/working-consumers/supplier-performancesocial-obligations
Gas and electricity supply market indicators	United Kingdom	https://www.ofgem.gov.uk/gas/retailmarket/monitoring-data-and-statistics/electricity-and-gas-supply-market-indicators
Information is shared with the NRA	Portugal	www.erse.pt

6. Physical measures.

Country	Measure	Website
Disconnection		
Minimum notice period before disconnection if bills are unpaid	France	http://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000019325694&fastPos=1&fastReqId=18114593

		39&categorieLien=cid&oldAction=rechTexte
Vulnerable consumers are protected from disconnection in winter months	United Kingdom	https://www.ofgem.gov.uk/about-us/how-we-work/working-consumers/supplier-performancesocial-obligations
Voluntary agreement to never knowingly disconnect vulnerable customers	United Kingdom	http://www.energy-uk.org.uk/publication/finish/30-disconnection/308-era-safety-net.html
Minimum notice period before disconnection if bills are unpaid	Hungary	http://njt.hu/cgi_bin/njt_doc.cgi?docid=110829.245949
Prevention of unexpected disconnections if bills are unpaid	Italy	http://www.autorita.energia.it/it/com_stampa/13/130222.htm
Regulation of disconnection during winter months	The Netherlands	http://wetten.overheid.nl/BWBR0030164/geldigheidsdatum_11-10-2013
Supplier of last resort		
Supplier of last resort	Portugal	www.edpsu.pt