

Scottish Government response to the Scottish Fuel Poverty Advisory Panel periodic report 2021-24 commission – August 2025

Please find a coordinated Scottish Government response to the Advisory Panel's commission received by the Fuel Poverty team on 1 July. It is acknowledged that the Panel may draw upon this evidence in their statutory report to Ministers.

Q1. How are WHS savings set out in page 10 calculated and who owns this methodology? How have SAP increases contributed to the reduction of FP

Within Warmer Homes Scotland, the fuel bill savings calculation is conducted by Warmworks who use the difference between the estimated annual energy costs figures in the pre and post Energy Performance Certificate (EPC) for each property. The EPC software uses the Reduced Data Standard Assessment Procedure (RdSAP) methodology to calculate these figures which includes assumed energy savings figures for measures installed and unit cost assumptions for any source of energy used in the home.

So far, in 25/26, there is an 8.2 SAP point improvement per installation and total carbon saving of 1,995 tonnes. Warmworks use Elmhurst to calculate carbon savings [Elmhurst Energy is the UK's largest independent provider of energy assessment, retrofit & property professional training, software and accreditation]. Their tool assigns a carbon saving figure to each measure, which is then used to calculate the total approximate carbon generated by the property in the initial PreEPC (before installation). Warmworks then compare this with total approximate carbon after installation using the PostEPC which generates a carbon saved for the individual property.

The table below shows average SAP Point improvements from WHS2 from scheme launch from October 2023 to April 2025

<u>Financial Year (For WHS2 only)</u>	<u>No. of Households Supported</u>	<u>No. of Heating, Insulation and Renewables Measures Installed</u>	<u>Total Carbon Saving</u>	<u>Total Average Fuel Bill Saving</u>	<u>Total Average SAP Point Improvement</u>
23/24	1,173	5,193	780.0	£580	5.6

24/25	7,334	14,778	5938.8	£466	6.3
-------	-------	--------	--------	------	-----

Q2. Please can you advise on the data you receive or expect to receive from the SFPAP as set out “Progress on the M&E Framework”.

The reference to obtaining data from the panel in the report refers to receiving the panel’s input on the draft Theory of Change (ToC) to further refine it and ensure it reflects the panel’s collective expertise.

The high-level Theory of Change, produced following consultation with relevant internal policy and analytical teams in the manner described in the report, is currently (as at 25 July) with those internal teams for review and feedback. After this stage, once the ToC is near finalised and any necessary revisions made, we plan to share it with the Panel for discussion. This will allow the Panel to share any further feedback that they may have – following their earlier session with Fuel Poverty policy and analysts - based on their own understanding and experience related to the actions and outcomes, that could inform its further development.

Q3. EPC A-C rates have moved from 45% in 2019 to 56% in 2023 (SHCS, as referred to on pages 6 and 11). Can you provide data (annual numbers & percentages) for the following categories:

- a) New builds (additions)
- b) Improvements (supported by SG intervention)
- c) Improvements (funded elsewhere – e.g. ECO)
- d) Improvements (other)
- e) Removed properties

a) The Scottish Government publishes quarterly update on Housing statistics. These include figures on total new housing supply, new housebuilding by public, private and social sectors, and the Affordable Housing Supply Programme. The latest available publication from June is available [here](#).

b) Since the WHS scheme re-launched in October 2023, Warmer Homes Scotland has helped 10,276 households, and installed 23,981 heating, insulation and renewable measures. As of July 2025, Warmer Homes Scotland has supported 1,769 households with 4,058 heating, insulation and renewable measures installed, creating an 8.2 SAP point improvement per installation in 25/26.

For Warmer Homes Scotland 1 - the total average SAP point improvement was: 2019/20 – 9.1; 2020/21 – 7.7; 2021/22 – 7.1 and 2022/23 – 6.4.

The Scottish Government reports annually about delivery of the Heat in Buildings programme, including the reported outputs from all our delivery schemes. [Heat in Buildings: progress report 2024 - gov.scot](#)

Since 2013 the Area Based Schemes (ABS) programme has benefitted around 125,000 households across Scotland. Information about the number and type of improvements delivered as part of our ABS programme is also published annually on our website: [Energy efficiency: Area-Based Schemes - gov.scot](#)

c) Information about the number of outputs delivered as part of the UK Government's Energy Company Obligation scheme is published here: [Household Energy Efficiency Statistics - GOV.UK](#)

The UK Government also published information about delivery of the Great British Insulation Scheme which also benefits low income households in or at risk of fuel poverty: [Summary of the Great British Insulation Scheme: April 2024 - GOV.UK](#)

d) The Scottish Government does not collect or hold any further information in relation to energy efficiency improvements which are made independently at the choice and discretion of the householder.

e) The Scottish Government does not collect or hold this information.

Q4. SG modelling of high energy price impact, as set out in the discussion of high energy prices as a driver of fuel poverty (p.22), shows that the 2.4% impact of other factors has partly mitigated the 4.4% uplift in FP. What is the breakdown of the factors contributing to the -2.4% impact?

This is set out and described on page 22 & 23 of the report - applying income and household budget changes decreased the fuel poverty rate by 2.4 percentage points. The fact that income has had a smaller effect than fuel prices in 2023 is largely the effect of increases in the MIS household budgets (ranging from 12% to 23%) counteracting increases to income (8% on average).

Q5. Can you explain the status classifications for the 55 Actions and how these have been assessed. (i.e. in progress etc.)?

As part of a structured development process to inform the development of an outcomes-focused Theory of Change, internal teams identified whether any changes or developments had been made since the publication of the Fuel Poverty Strategy

in 2021. This data was used by the Fuel Poverty team in their engagement with the policy leads, to broadly categorise the status of existing actions, whilst recognising that each action will have unique nuances and may therefore be interpreted differently. Each action was categorised against one of four status updates:

Delivered broadly reflects a) actions that have been completed or b) actions - primarily those without a set completion date or milestone – that are being delivered at scale with appropriate governance and support mechanisms in place;

In progress broadly reflects a) where progress has been made or b) where progress has been made but the action has an outstanding completion date or milestone;

Early stages of development broadly reflects where some developments have been made, but progress has been limited;

Paused reflects where actions are unable to currently progress and may in some cases not be taken forward due to various and changing circumstances.

Q6. To what extent is the Scottish Government able to evidence the impact of each policy intervention on the attainment of the fuel poverty targets?

Sub-question (a): As a worked example, is the Scottish Government able to demonstrate using the Fuel Poverty definition the contribution of (1) free bus travel, (2) free school meals, and (3) Carbon neutral islands and Community and Renewable Energy Schemes on the attainment of the fuel poverty targets?

Given the multitude of variables which can influence fuel poverty rates, it is extremely challenging to directly correlate the impact of a single action on fuel poverty rates. However, as referenced above, we are continuing to progress the development of a high-level Theory of Change (ToC) which aims to articulate the long-term goals to be achieved as a result of the actions contained within the Fuel Poverty Strategy and the process that will lead to those goals.

The ToC will also seek to outline potential unintended consequences and factors that may influence the realisation of long-term goals.

Q7. Our understanding of the [Fuel Poverty \(Targets, Definition and Strategy\) \(Scotland\) Act 2019](#) is that Scottish Ministers must include progress in relation to each local authority area in their periodic reports. Is this accurate? (Paragraph 9, 2 (a)-(c))

The Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019 requires each periodic report to set out the steps and progress made during the reporting

period, and proposed next steps in the subsequent reporting period, for the purposes of meeting the 2040 fuel poverty target - which must be met in every local authority area in Scotland. The Act also sets a list of consultation requirements, which includes local authorities.

As outlined in the report, the Acting Minister for Climate Action invited all 32 local authorities to respond to a targeted engagement exercise. This included asks for information on local action taken to tackle the four fuel poverty drivers and views on the impact made. An analysis of responses is included in the periodic report with individual responses [separately published](#). This is supplemented by a summary of collective duties that the Scottish Government are supporting local authorities to progress, such as preparation of Local Housing Strategies and Local Heat and Energy Efficiency Strategies.

Due to the impact of Covid-19 restrictions on the 2020 and the 2021 Scottish Household Survey methodologies, it was not possible to produce local authority fuel poverty estimates within the 2021-2024 reporting period. We expect these estimates to be published in early 2026.