



EmpowerMed

National policy  
recommendations  
*Spain*





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# 1 National context

Energy poverty is on the rise in Spain. The COVID-19 pandemic saw an increase of official statistics established by National Energy Poverty Strategy 2019-2024 as a result of the lockdowns and mobility restrictions imposed during the years 2020 and 2021, which were then further exacerbated by the global energy price crisis and the Ukraine war. Specifically, the latest available results of the Spanish Survey on Income and Living Conditions (*Encuesta de Condiciones de Vida*) indicate that as of 2021, 14.3% of the Spanish population was unable to keep their home adequately warm during winter – a figure that nearly doubled the value for this indicator in 2019 (7.6%) and represents the highest percentage in the whole time series 2004-2021. Regarding arrears in utility bills, as of 2021 9.5% of the Spanish population was unable to pay household bills on time (compared to 6.6% in 2019), which represents a 30% increase in the incidence within two years. Other indicators produced under the mandate of the National Energy Poverty Strategy indicate a significant proportion of households reporting disproportionately high (indicator 2M: 16.8%) or inadequately low (indicator HEP: 10.3%) energy expenses in the year 2020 according to Household Budget Survey data.

The increase in global energy prices, especially for natural gas, recorded in international markets since autumn 2021 – a trend further exacerbated by the invasion of Ukraine by Russian armed forces since February 2022 – has significantly worsened overall conditions for vulnerable households and probably will continue to do so until the end of the EmpowerMed project in August 2023. In response to changing conditions, the Spanish government has passed a series of policy packages aimed at lessening the impact of quickly rising energy prices on inflation rates and on vulnerable households. Earmarked funds for energy efficiency allocated to Spain through the EU's Resilience and Recovery Facility (RRF) in 2021 include the delivery of 20,000 new energy efficient social housing units and grants for retrofitting residential buildings that subsidize up to 100% of eligible costs in the case of financially vulnerable property owners or tenants. These add to temporary direct support measures put in place through the years 2020-2022 in response to the pandemic and the global energy price crisis – see Table 1 below. Despite these efforts, it is deemed that vulnerable households in Spain are under additional strain as compared to pre-2020 conditions. Yet the widespread recognition of energy poverty as a distinct societal issue and differentiated area for policy action (as evidenced by, e.g., a National Energy Poverty Strategy in place since 2019 at the national level, or a dedicated network of Energy Advisory Offices at the local level in the municipality of Barcelona since 2017) offers a favorable basis for the emergency policy responses put in place since 2020. However, significant additional efforts would be needed to address both the short-term impact of the post-2021 energy price crisis and the structural, long-term drivers of energy poverty. All in all, the national energy poverty landscape is going through significant changes at a quick pace thus making advocacy work both at the Spanish and Catalan levels more challenging than what was expected at the beginning of the EmpowerMed project.

**TABLE 1: Changes in the policy framework since March 2020**

### **'Social shield' (*escudo social*) in response to the COVID-19 pandemic (2020)**

- Temporary prohibition of cutting off electricity, oil, natural gas and water supplies and temporary suspension of foreclosures and evictions – for the main/primary place of residence of any household (in place at least until autumn 2022).
- Establishment of a national Guaranteed Minimum Income (*Ingreso Mínimo Vital*) and increase of the minimum wage to 1,000€ per month
- Establishment of a specific COVID-19 job retention scheme (*Expediente de Regulación Temporal de Empleo, ERTE*) for workers in sectors and businesses impacted by lockdowns and mobility restrictions.

### **Global energy price crisis and contingency measures in response to the Ukraine war (2021-2022)**

- Lowering of electricity taxes (e.g., VAT for electricity reduced to 10%)
- Limited quarterly increase of the regulated tariff price for natural gas.
- Increase of the discount the social electricity bonus from 25-40% to 65-80% (depending on vulnerability level of beneficiary household).
- 15% increase in maximum amount of annual electricity consumption (in kWh) subsidized with the social electricity bonus.
- Increase in the social thermal bonus from 25-124 to 35-350 €/year per household.
- Lowering of income thresholds to access the social electricity/thermal bonus.
- Increased coverage of social bonus with a new beneficiary category of low-income working households.
- Goal to increase the number of social electricity/thermal bonus beneficiary households by 600,000 households plus raising the income thresholds for eligibility
- 15% increase in the amount of the Guaranteed Minimum Income (*Ingreso Mínimo Vital*).
- Agreement with the European Commission for a capped price of natural gas-based electricity in the Iberian electricity (Portugal and Spain) of a maximum of 40 - 50 €/MWh, which is expected to bring down the regulated price of electricity for household consumers by 30%.
- Establishment of a regulated tariff for natural gas central heating in condominiums.

### **Post-COVID resilience and recovery funds (autumn 2021)**

- 3.4 billion allocated to Spain through the EU's Recovery and Resilience Facility for a housing retrofits and urban regeneration plan with some socio-economic vulnerability allocation criteria.

## 2 Key results from the Barcelona pilot site

The EmpowerMed pilot site in Barcelona revolved around collective advisory assemblies. These assemblies consist of bi-monthly gatherings aimed at empowering people to face the multiple problems that come from life in energy poverty, especially in relation to the payment of utility bills, understanding and managing supply contracts, dealing with indebtedness and disconnections, and the enforcement of consumer rights. During periods of COVID-related mobility restrictions in 2020-2021, collective assemblies consisted of hybrid in-person and virtual gatherings.

Overall results from the Barcelona site indicate that through the 56 collective assemblies held between the 23rd of October of 2019 and the 20th of April of 2022 resulted in a total of 1,335 people participants. Advice and support delivered through assemblies resulted in €31,075 of total estimated cost savings for participant households (with an average of €555 saving achieved per assembly). In addition, 25 post-assembly 'accompaniments' to selected participants were conducted to the commercial offices of utility companies with the aim of regularizing the connection to supply networks, which resulted in an agreement with the suppliers for the signature of supply contract in 15 cases (63% success rate). Thanks to accompanying and advocacy actions carried out in parallel to collective assemblies, 21 people had their debt with utility providers cancelled, which resulted in an additional €18,301 of domestic energy cost savings.

EmpowerMed carried out Do-it-yourself (DIY) workshops and organized health workshops in the Barcelona pilot site also through to collective assemblies. Health workshops took place in the form of mutual self-support meetings, of a smaller size than collective assemblies, in which participants shared their experiences and feelings among their peers in a safe space and under the guidance of a certified therapist. In the 21 mutual self-support sessions held from October 2021 to July 2022, a total of 152 people signed as attendees, of which 66% were women. In parallel, DIY workshops based on the assessment of detailed electricity consumption data obtained from smart meters resulted in cost savings in 19 out of the 29 participant households, with energy bills advice provided to all 29 households. Complementary to those efforts, a thermal comfort campaign monitored indoor air temperatures, humidity and CO2 concentrations monitored through sensors in 27 households (14 of which were affected by energy poverty).

**TABLE 2: Overall results for Barcelona pilot site**

KPI	CA	DIY	SFS	HW	Total
Number of participants (women)	1,335 (777)	29 (22)	34 (23)	179 (123)	1,582 (825)
Electricity savings [kWh/year]	-	-	-	-	0
Heat energy savings [kWh/year]	-	-	-	-	0
Energy savings* [kWh/year] (%women)	-	-	-	-	0
Water savings [m3/year]	-	-	-	-	0
Primary energy savings [kWh/year]	-	-	-	-	0
Cost savings [€/year] (% women)	49,376 (60%)	546 (76%) )	9,560 (68%) )	-	59,482 (61%)
People free of debt (women)	21 (15)	-	15 (10)	-	36 (25)
CO2 savings [kgCO2/year]	-	-	-	-	0

CA: Community approaches, DIY: Do-It-Yourself workshops, SFS: Support for financial schemes, HW: Health workshops. \*Includes heat and electricity

No energy or emissions savings were accomplished through EmpowerMed community support actions in Barcelona since they were not intended to reduce the energy use of

affected household but rather to lower their energy bills through supply contract optimization and improve their overall comfort levels. To do so, participants were offered support in the access to the social bonus (*bono social*) – a means-tested discount applied to the domestic energy bill of ‘vulnerable consumers’ that represents 21% of the total savings reached through collective assemblies – and were advised to lower their contracted capacity to reduce these fixed charges that make up a substantial percentage of their electricity bill.

All in all, women represented 58% of all participants in EmpowerMed project activities in Barcelona. Women also made up 61% of the persons speaking during collective assemblies and 72% of utility contract holders (for households with gender-disaggregated data on this aspect).

### 3 Key recommendations

#### **1. Consolidate progress and enhance coverage of direct support mechanisms on the way to a truly social energy tariff.**

Changes introduced in the Spanish social electricity/thermal bonus gas (*bono social de electricidad* and *bono social térmico*) in response to the COVID-19 pandemic and the 2021-2022 global energy price crisis have increased the percentage of discounts in the energy bill of vulnerable consumers, the amount of subsidised annual electricity consumption and the number of potential beneficiaries. Still, many of these have been approved as temporary improvements subject to periodic revision by the national government and therefore risk being withdrawn if deteriorating macroeconomic conditions result in state budget cuts. In addition, many of the potentially eligible beneficiaries of the social bonus still do not have access this form of support (the main energy poverty alleviation instrument available at the Spanish national level) because they do not know of its existence or due to the administrative hurdles in application procedures. Specifically, it is known that the currently supported 1.2 million beneficiary households (equivalent to some 3 million people) of the social bonus<sup>1</sup> represent a fraction of the 5 to 10 million people living in energy poverty according to the four official headline indicators of the Spanish National Energy Poverty Strategy 2019-2024<sup>2</sup>. Based on the experience of the EmpowerMed project, which confirms the need for direct financial support instruments such as the social bonus, we recommend introducing changes in the social electricity/thermal bonus for an automatic allocation of the benefit in such way that all eligible households have the discount included in their energy bill without having to apply for it – as is the case of the social bonus in Portugal since 2016<sup>3</sup>. We also advocate for consolidating the temporary improvements in the level of financial support (i.e., higher energy bill discounts, increased amount of subsidised electricity consumption, etc.) achieved in the years 2020 – 2022 through changes in social bonus conditions. In the long run, it is advised that

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<sup>1</sup> URL: <https://www.cnmec.es/sites/default/files/4357591.pdf>

<sup>2</sup> URL: [https://www.miteco.gob.es/es/ministerio/planes-estrategias/estrategia-pobreza-energetica/actualizacionindicadorespobrezaenergetica2021\\_tcm30-534743.pdf](https://www.miteco.gob.es/es/ministerio/planes-estrategias/estrategia-pobreza-energetica/actualizacionindicadorespobrezaenergetica2021_tcm30-534743.pdf)

<sup>3</sup> URL: <https://publicadministration.un.org/unpsa/en/Home/Case-Details-Public?PreScreeningGUID=6681792d-c839-4e02-a3c6-74671ce9babe&ReadOnly=Yes>



domestic energy prices follow a social tariff rationale designed as an increasing block tariff (in which high energy consumption is charged at higher price) sensitive to household income.

## **2. Address disconnections and lack of access to the supply as urgent energy poverty challenges.**

Energy poverty action in Spain remains centred around indoor thermal comfort and the affordability of domestic energy. While these are significant concerns for most of the affected population, other more acute forms of energy poverty are often downplayed. Consequently, issues such as the indebtedness to utility providers, disconnections, and informal/irregular access to the supply, especially among households in informal housing or irregularly occupying the properties where they live (e.g., without a property deed or lease contract) remain largely absent in energy poverty debates and policies. These are connected to broader housing access and affordability difficulties experienced by poorer households, especially in cities with tense real estate markets such as Barcelona and Madrid, as highlighted by the 684,000 evictions and foreclosures reported by the General Council of the Judiciary for the period 2008-2019<sup>4</sup>. While the current policy framework forbids disconnecting certain categories of 'vulnerable consumers' from the electricity supply, an enhanced policy framework should ensure that all households have a sufficient level of access to basic utility services (electricity, gas and water) for a dignified life regardless of their ability to pay and their housing tenure arrangements. Specific advice in this direction would be permanently extending the temporary ban on utility supply disconnections approved in 2020 as part of the COVID-19 'social shield' policy package<sup>5</sup>, for which the experience of the implementation of Law 24/2015 of the Parliament of Catalonia, which has likely prevented over 200,000 disconnections of water, natural gas and electricity supply among household at risk of housing-related exclusion in Catalonia alone<sup>6</sup>, represents a valuable policy experience. Urgent action is also needed to address the dire living conditions in informal settlements such as Cañada Real (Madrid)– a unprecedented case of collective disconnection from the electricity supply in which a whole community of 4,000 people (including over 1,000 children) are without access to the electricity since October 2020, which has motivated an inquiry by the UN's Special Rapporteur on extreme poverty and human rights<sup>7</sup>. The same applies for households living in occupied dwellings, often their own property of which they have been dispossessed through foreclosure by financial institutions while they negotiate a social tenancy lease. These families are not given the possibility of legal supply contract to securely access the energy or water supply. In this regard, the experience of the so-called 'social meters' or 'social emergency meters' (i.e., special supply contracts for households living in such conditions) in Catalonia, which was made possible through to the agreement between the electricity provider Endesa and local water utility companies with the Catalan government in accordance to the mandate of Law 24/2015, offers a precedent that can be extended at

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<sup>4</sup> URL: <http://observatoridesc.org/ca/nou-informe-sobre-l-evolucio-dels-desnonaments-2008-2019-que-evidencia-que-vulneracio-del-dret-l>

<sup>5</sup> URL: [https://www.lamoncloa.gob.es/consejodeministros/Paginas/enlaces/261021-enlace\\_escudo\\_social.aspx](https://www.lamoncloa.gob.es/consejodeministros/Paginas/enlaces/261021-enlace_escudo_social.aspx)

<sup>6</sup> URL: <https://esf-cat.org/wp-content/uploads/2021/09/La-lluita-contra-la-pobresa-energetica-al-mon-municipal-web.pdf>

<sup>7</sup> URL: <https://spcommreports.ohchr.org/TMResultsBase/DownloadFile?gId=36158>



the Spanish level.

### **3. Avoid the accumulation of household debt with utility providers and stop harassment by debt collectors.**

Measures aimed at avoiding or preventing supply disconnections can lead to the indebtedness of protected households towards suppliers for the accumulated unpaid consumption, which then becomes a significant burden for people's finances and may restrict their overall access to credit. Consequently, debt prevention mechanisms need to be in place for affected households neither run into nor accumulate debt with utility providers. This can be achieved by having 'vulnerable consumers' pay reduced energy bills with discounts proportionate to their income and personal circumstances – or even nothing at all as it is the case of 'households in severe vulnerability at risk social exclusion' within the Spanish social bonus framework. For debts accumulated by vulnerable consumers in the past, agreements can be struck with utility providers for their write-off. The question of who bears the financial burden of the unpaid bills can be solved through a negotiation between utility companies and the public administration. The experience of the EmpowerMed project is valuable in this regard. In March 2021, the Generalitat de Catalunya and other Catalan Administrations signed an agreement with Endesa – the largest electricity provider in this autonomous region – for writing off the 28 million Euro of debt accumulated by 35,000 vulnerable families between 2015 to 2020. The agreement also foresees a Solidarity Care Fund, to which Endesa and the Catalan administrations each contribute on a 50-50% basis, that will prevent the accumulation of further debt through substantial discounts on energy bills<sup>8</sup>. On this basis, we recommend extending current debt write-off schemes to other utility providers and Spanish regions following the Endesa agreement example in Catalonia.

At the same time, the project also advocates for the decriminalization of domestic energy debts, especially for people that have been brought to court because of this reason. The *Síndic de Greuges de Catalunya*<sup>9</sup> (the Ombudsperson of Catalonia) has requested debt collector to stop harassing people in situation of vulnerability, as it constitutes an unethical business practice that causes emotional and mental damage to the health of those affected by energy poverty, beyond other physical health impacts. Harassment calls reported by EmpowerMed project participants in Barcelona have been used as evidence in a court case brought by the Alliance against Energy Poverty (APE) against debt collectors of the electricity provider Endesa. Employees of this company supposedly called affected participants as if they were public court officers, which allegedly constitutes a violation of the Spanish law and human rights legislation. If the court case is won by APE and the women that received these calls, it would represent a precedent of the illegal business practices of utility companies in collecting domestic energy debts that would show the potential of lived experiences of this sort to stop harassment behaviour of utility companies.

### **4. A systematic review of the energy poverty framework from an intersectional**

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<sup>8</sup> URL: <https://www.empowermed.eu/agreement-with-endesa-will-free-more-than-35000-vulnerable-families-from-their-debts-on-electricity-bills/>

<sup>9</sup> URL:

[https://seu.sindic.cat/Resolucions/ISAPI/Resol\\_ISAPI\\_FitxaResol/x64/Debug/Resol\\_ISAPI\\_FitxaResol.dII?CodiQueixa=0865718&TipusIntervencio=1](https://seu.sindic.cat/Resolucions/ISAPI/Resol_ISAPI_FitxaResol/x64/Debug/Resol_ISAPI_FitxaResol.dII?CodiQueixa=0865718&TipusIntervencio=1)

### **lens that consider gender along with other discrimination axes.**

Gender as a driving factor of energy vulnerability is partially recognised in the Spanish energy poverty policy framework. Gender is mentioned in the National Energy Poverty Strategy 2019-2024<sup>10</sup> as a criterion required for disaggregating energy poverty statistics (measures 1 and 2) and for the allocation of financial resources for 'express' retrofits (measure 7). However, official energy poverty statistics published by the Ministry for the Ecological Transition do not offer any gender-disaggregated results for the four indicators included in annual update reports<sup>11</sup>. Regarding support measures, single-parent households and women victims of gender-based violence are also prioritised in the social energy bonus eligibility criteria through higher income thresholds – but then gender is largely missing in other measures within the framework of the National Energy Poverty Strategy. We therefore recommend a systematic review of the relevant policy framework from an intersectional perspective to incorporate gender together with other discrimination axes related to, e.g., ethnicity, place of birth, disability, age, etc. Suggested concrete steps in this direction include: i) the review of the official energy poverty statistics framework so that gender-disaggregated indicators are provided in annual updates, ideally together with other relevant intersectional dimensions such as a place of birth, age, disability, etc.; and ii) ensuring that to-be-implemented measures of the National Energy Poverty Strategy are designed with an gender/intersectional lens when, for instance, establishing eligibility criteria that give access to support mechanisms. As indicated in the EmpowerMed review of previous EU experiences (deliverable D1.3)<sup>12</sup>, these changes in the policy framework should acknowledge the gendered nature of domestic energy use and address gender-specific drivers of energy poverty without reinforcing gender stereotypes and heteronormative household models.

### **5. Energy poverty needs to be addressed as a socio-economic determinant of poor mental health.**

Mental health is rising its profile as an issue of societal concern in post-COVID Europe, yet it needs to be acknowledged not everyone is affected the same way. As expressed by the advocacy platform Mental Health Europe (MHE) in its the October 2021 statement<sup>13</sup>: “women and girls, children, ethnic minorities, people with disabilities, LGBTI, older persons, undocumented people, young people and those with difficult socio-economic realities, are [...] groups that are at risk of being disproportionately impacted by mental ill-health”. In Spain, where nearly 10% of the population takes anxiolytic and hypnotic drugs on a daily basis<sup>14</sup>, dedicated hearings and sessions held in the Congress of Deputies in recent years have discussed the status of mental healthcare provision and prevention. In this context, energy poverty needs to be identified as a socio-economic determinant of mental health – along with other forms of material deprivation and precariousness. An enhanced policy

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<sup>10</sup> URL: [https://www.miteco.gob.es/es/ministerio/planes-estrategias/estrategia-pobreza-energetica/estrategianacionalcontralapobrezaenergetica\\_tcm30-502982.pdf](https://www.miteco.gob.es/es/ministerio/planes-estrategias/estrategia-pobreza-energetica/estrategianacionalcontralapobrezaenergetica_tcm30-502982.pdf)

<sup>11</sup> URL: [https://www.miteco.gob.es/es/ministerio/planes-estrategias/estrategia-pobreza-energetica/actualizacionindicadorespobrezaenergetica2021\\_tcm30-534743.pdf](https://www.miteco.gob.es/es/ministerio/planes-estrategias/estrategia-pobreza-energetica/actualizacionindicadorespobrezaenergetica2021_tcm30-534743.pdf)

<sup>12</sup> URL: <https://www.empowermed.eu/wp-content/uploads/2020/07/D1.3-Report-on-previous-experiences-Final-for-Web.pdf>

<sup>13</sup> URL: <https://www.mhe.org/mental-health-advocacy-platform-statement/>

<sup>14</sup> URL: <https://elpais.com/sociedad/2022-02-27/mayores-enganchados-a-los-tranquilizantes-espana-es-el-pais-con-mas-consumo-de-benzodiacepinas-del-mundo.html>

framework needs to recognise that energy poverty does not only have to do with material living conditions: on the contrary, it is a matter of human dignity with significant emotional and psycho-social well-being implications. From this perspective, it should be recognised the importance of support policies for reducing the mental health burdens of domestic energy deprivation, and those suffering from poor mental health should be prioritised when designing and implementing energy poverty alleviation measures. In the case of households indebted to utility providers, targeted action is advisable against harassment phone calls and mail by debt collectors or utility companies as a factor contributing to emotional distress. Collective mutual support groups such as the ones launched in the EmpowerMed Barcelona pilot site could be established by local councils or non-profit organisations in other locations. Finally, further research is still needed to better understand the relationship between energy poverty and poor mental health.

## **6. Ensure a just implementation of post-COVID recovery refunds by allocating a fair share of energy efficiency investments to energy poverty alleviation.**

In regard to the implementation of strategic COVID-19 Recovery and Resilience Facility Fund and other long-term EU strategic climate and energy action plans, energy poverty is partially recognised as a priority, but most funds allocated still benefit non-vulnerable households thus increasing pre-existing energy-related inequalities. More specifically, the climate and energy chapter of Spain's post-COVID recovery and resilience plan (RRP) foresees investments of over €7.8 billion in the energy efficiency of public and private buildings, including new social housing. Out of this, it is expected that €3.4 billion will go into half a million retrofit actions in residential buildings until 2026 to deliver a primary energy demand reduction of at least 30% on average<sup>15</sup>. Within the Spanish RRP, component 2 (*Componente 2: Plan de rehabilitación de vivienda y regeneración urbana*) includes potentially energy poverty-relevant investment lines C02.I01 and C02.I02 aimed at building 20,000 new highly energy efficient social housing units and at retrofitting residential buildings<sup>16</sup>. For the latter, RRP subsidies will cover between 40% and 80% of the retrofit costs for an average household, which goes up to 100% of eligible costs in the case of financially vulnerable property owners or tenants<sup>17</sup>. There is not, however, an articulated strategy to ensure that RRP's component 2 funds will effectively contribute to energy poverty alleviation. Based on the collaboration of the EmpowerMed project with the civil society stakeholder Alliance for Housing Retrofits without Leaving No One Behind (*Alianza por la Rehabilitación de Viviendas sin dejar a nadie atrás*), our recommendations in this regard include:

- tracking the spending of RRP's funds effectively reaching low-income households, with data disaggregated by gender;
- earmarking 20% of the budget of RRP's residential energy efficiency programmes (1, 3 and 4) for the retrofitting of housing units whose owners or tenants are people in a situation of vulnerability, especially women;
- specific programmes and funding targeting rental housing inhabited by low-income

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<sup>15</sup> URL: [https://ec.europa.eu/info/business-economy-euro/recovery-coronavirus/recovery-and-resilience-facility/spains-recovery-and-resilience-plan\\_en](https://ec.europa.eu/info/business-economy-euro/recovery-coronavirus/recovery-and-resilience-facility/spains-recovery-and-resilience-plan_en)

<sup>16</sup> URL: <https://www.mitma.gob.es/ministerio/proyectos-singulares/prtr/participacion-mitma/c2>

<sup>17</sup> URL: <https://www.mitma.gob.es/ministerio/proyectos-singulares/prtr/vivienda-y-agenda-urbana/programa-de-ayuda-las-actuaciones-de-rehabilitacion-nivel-de-barrio>

households, persons affected by energy poverty and social housing tenants.

- renovation-proof rent caps for housing units where low-income tenants live when these dwellings are retrofitted with help of RRP's and other public funding;
- prioritisation of urban areas built between 1940 and 1980 (where buildings with poor energy performance and high energy poverty rates concentrate) for the energy efficiency investments foreseen in programme 2 targeting vulnerable neighbourhoods, i.e., *Entornos Residenciales de Rehabilitación Programada* (ERRP);
- channelling of RRP funding through non-profit entities (NGOs, social housing companies, local councils, etc.) that deliver turnkey retrofits that ensure fitness for the needs and circumstances of households affected by energy poverty;
- exempting low-income households from reaching mandated energy saving targets (e.g., 30% of primary energy in the case of RRP funding) in consideration of their reduced energy consumption levels, together with the consideration of indoor comfort improvement when assessing the impact of retrofits.

## **7. Include summertime energy poverty in relevant policy frameworks at all levels.**

Climate change is increasing the frequency, intensity and length of heatwaves as seen throughout Europe in the summer of 2022. The Mediterranean region is increasingly exposed to these events, especially in cities where the urban heat island effect exacerbates extreme temperatures in the summer. In Barcelona, the number of 'tropical nights' (in which the temperature does not fall under 20 °C) broke a new record with an unprecedented 132 of such nights registered in the year 2022<sup>18</sup>. Despite quickly mounting evidence of these trends, the Spanish policy framework is failing to recognize summertime energy poverty as an issue steadily increasing its relevance in parallel to rising global mean temperatures. Summertime energy poverty is recognized in the National Energy Poverty Strategy 2019-2024 but then not included in annual updates of the four headline indicators but then not specifically addressed in any of the Strategy's structural measures aimed at improving the energy efficiency and indoor thermal conditions of housing. Our recommendations in this regard include:


- considering summertime indoor thermal comfort and availability of air conditioning as relevant energy poverty indicator following the relevant items and research of the *ad hoc* modules 2007 and 2012 of the EU Survey on Income and Living Conditions (EU SILC) reported by EPOV and EPAH<sup>19</sup>;
- ensuring that measure 6 ('Consumer protection in extreme weather events') of the National Energy Poverty Strategy considers heatwaves when establishing temporary disconnection bans;
- include summertime indoor thermal comfort in energy efficiency interventions of the National Energy Poverty Strategy (measures 7 to 11 in Axis 3 'Creating structural change for the reduction of energy poverty energy poverty');
- ensure that energy poverty provisions are adopted in the implementation of the Spanish National Climate Change Adaptation Plan 2021-2030<sup>20</sup> in such a way that vulnerable

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<sup>18</sup> URL: <https://elpais.com/espana/catalunya/2022-11-02/barcelona-vuelve-a-batir-record-de-noches-tropicales-132-a-mas-de-20-grados.html>

<sup>19</sup> URL: [https://energy-poverty.ec.europa.eu/observing-energy-poverty/national-indicators\\_en](https://energy-poverty.ec.europa.eu/observing-energy-poverty/national-indicators_en)

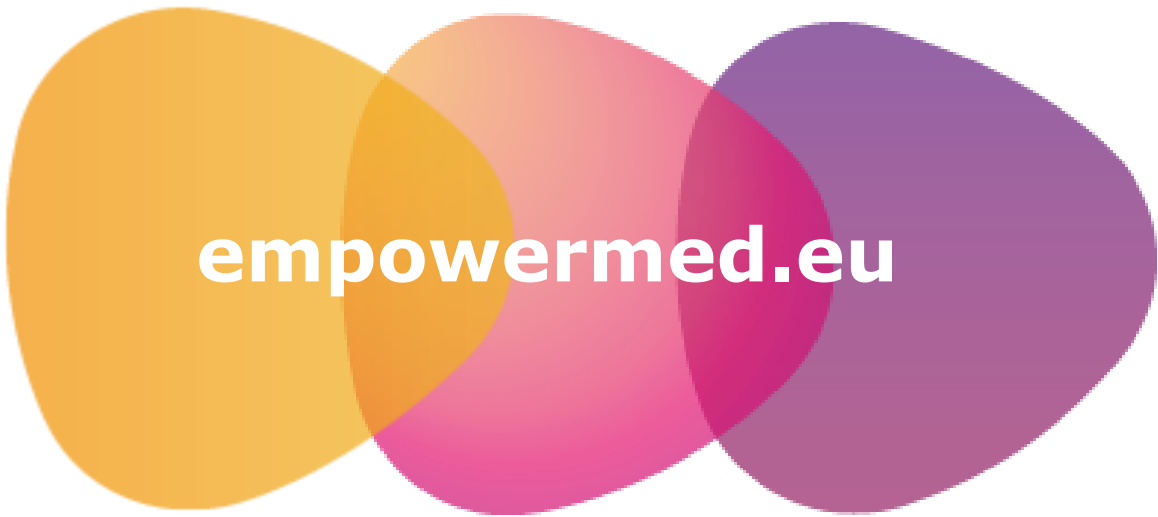
<sup>20</sup> URL: <https://www.miteco.gob.es/es/cambio-climatico/temas/impactos-vulnerabilidad-y->

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- population (e.g., low-income elderly living alone in dense urban areas) are specifically targeted by information campaigns and specific support measures;
- at the urban scale, considering the creation of climate shelter networks following the example of the Barcelona city council's<sup>21</sup>.

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[adaptacion/pnacc-2021-2030-en\\_tcm30-530300.pdf](#)

<sup>21</sup> URL: <https://www.barcelona.cat/barcelona-pel-clima/ca/barcelona-respon/accions-concretes/xarxa-de-refugis-climatic>



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