

Energy poverty and the vulnerable energy consumer in Romania: A curious case of policy schizophrenia

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Abstract. *The article explores the concepts of energy poverty and vulnerable consumers in the Romanian policy context. It uses text analysis of policy documents and shows how policies increasingly prioritized addressing these intertwined, yet distinct, phenomena. In parallel however, the main support system available for vulnerable consumers – heating benefits – evolved in a reverse direction. Between 2011 and 2020 the allocated benefits decreased ten times in terms of budget expenditure, and the coverage (the number of beneficiaries) seven times. In other words, seemingly contradictory, the more policymakers prioritize a certain policy area, the less citizens enjoy concrete, tangible benefits in that area.*

Keywords: energy policy, energy poverty, vulnerable energy consumer, social policy, policy prioritization.

JEL Classification: H11, H20, H31, H53, Q48.

Introduction

The topic of energy poverty and its corollary – the vulnerable energy consumer – has gained in the past years not only traction in the academic world, but increasingly so at policy level and in discourses promoted by relevant market players. Evidence of this momentum can be found in multiple directions, not least of which the launch at EU level of the Energy Poverty Observatory and the launch of a similar entity (The Romanian Energy Poverty Observatory/Observatorul Român de Sărăcie Energetică) at national level. In this paper aims I investigate whether policy prioritization of energy poverty/the vulnerable energy consumer in Romania leads actually to quantifiable, increased support for vulnerable energy consumers.

Being able to ascertain such a correlation would serve as evidence for the effectiveness of policy-making. If decision-makers prioritize a certain topic and the actions they take on the matter lead to measurable results for the citizens, then one can talk about high-impact policies. If, on the contrary, despite increased policy focus on the topic, concrete results for citizens are not achieved, then one can talk about policy failure, policy implementation flaws and, ultimately, poor service delivery. Lack of such correlation or a very long lag between prioritization and effective results are also interesting aspects to examine, for both practitioners and public policy analysts, and a point in case for incremental policy adjustments and for an iterative application of the eight-steps policy cycle (Bardach, 2011) and especially for evidence building.

In the context of the current energy crisis which has unfolded across the European Union, with energy prices reaching skyrocketing levels, the conversation on effective policy tools for protecting vulnerable consumers is even more important, since universal energy price caps for the end users have been almost universally deemed as unsustainable from a public finance perspective.

1. Literature review

The concept “energy poverty”

There is no unitary approach as far as the concept of energy poverty, neither at the level of relevant literature (including from a definitional standpoint), nor at the level of public institutions (national or European), although it is an important concern for all modern states. This diversified approach mainly proves that the phenomenon is complex and multidimensional. Furthermore, this generates an entire diversity of indicators and public policies. The insufficiency and inadequacy of the available statistical data and the differences in approach among the Member states – which vary from mere recognition of the phenomenon to concept definitions and the designs of measures – have allowed for the general acceptance that the most efficient way to intervene is at the national level.

The most widely accepted definition of energy poverty refers to the impossibility of a household to provide energy services for itself, at affordable prices (Liddell et al., 2012, pp. 27-28) (Brennan et al., 2011, p. 203), while the latest definition put forward by European institutions in the formal setting of the Energy Poverty Advisory Hub (EPAH)

refers more generally to the “inability of households to ensure their energy needs” (EPAH, 2022, p. 6). The concept of energy poverty is theoretically placed where the income and the energy expenses of a household meet, but the latest European definitions and approaches tend to focus on broader aspects, coined as “a combination of contextual and personal factors” (EPAH, 2022, p. 6) – the former being about climate, the geographical location, dwelling type, etc. while the later concern age, health status or household composition. Muşătescu adds three complementary conditions: the technical under-performance of the home, the lack of access to cheap services within the context of a competitive market, the lack of an efficient/adequate heating system (Househam and Muşătescu, 2012).

Being a multidimensional concept, energy poverty is hard to capture with a single indicator. Therefore, European institutions are recommending to Member State to use no less than 21 indicators (revised from 28 previously recommended, between 2017 and 2020), which nowadays form an online, comparable digital database hosted by EPAH. As academic research evolves, it is also expected that these indicators are iteratively reformulated and improved. Out of the 28 indicators monitored by EPAH, four are primary (arrear on utility bills, low absolute energy expenditure $M/2^{(1)}$, high share of energy expenditure in income $2M^{(2)}$ and inability to keep home adequately warm), while the rest are secondary and refer to fuel prices, energy expenses based in income quintiles, dwellings equipped with modern heating or cooling, number of rooms per person by ownership status, as well as presence of leak, damp or rot. Perception indicators, such as the inability to keep homes adequately warm, despite academic criticisms, which point out that it should be combined with objective indicators (Bouzarovski, 2014, pp. 276-278), or with variables that discern the problem in a more aggregated fashion (Castano-Rosa et al., 2020), or even that the EU-SILC surveying was not designed to measure energy poverty (Thomson and Snell, 2013, p. 565), are considered, nonetheless, very important in measuring the full picture of the phenomenon.

The concept “vulnerable consumer”

Academic literature and European institutions identify different sets of so-called “vulnerability factors” of households and individuals vis-à-vis energy poverty. EPAH (2022) categorizes them in five classes: sociodemographic factors, household composition, health, energy literacy and cultural factors (EPAH, 2022, pp. 10-11). Academic literature points out how the concept of consumer vulnerability is even broader and touches on issues of participation in decision-making processes and addressing “multiple injustices that prevent them (the vulnerable consumers) to fairly participate in the energy transition”, as all these aspects tie into the concept of “energy citizenship” (Della Valle and Czako, 2022, pp. 1-2). The connection between energy poverty and vulnerability resides both in the fact that, from a vulnerability perspective, one needs to monitor the risks that make certain groups more likely to become energy poor (Bouzarovski, 2014) and in a temporal aspect: while energy poverty measures a condition clearly delineated in time, energy vulnerability is “a fluid state in which a household might enter or exit due to a change in housing, social, political or economic circumstances” (Simcock et al., 2017).

Finally, vulnerability also relates to a “lack of recognition and procedural justices” (Walker and Ray, 2012).

From a temporal policy development perspective, the concept of “vulnerable consumers predates that of “energy poverty” insofar as the application of European legislation is concerned. Thus, it was as early as 2009 that the Third Energy Package obliged Member States to adopt vulnerable consumer definitions and protective measures, while it was only in 2019 that the European Commission demanded that Member States quantify the energy poverty situation in their Integrated National Energy and Climate Plans. Some others (Pye, 2015) point out that the protection of vulnerable consumers and the energy poverty challenge are “linked yet distinct issues”, because vulnerable consumers refer strictly to gas and electricity consumers that may not have access to competitive tariffs or need additional protection measures, while energy poverty goes beyond gas and electricity and moves into areas related to energy services, energy efficiency, energy costs and disposable income, etc.

The concept “policy prioritization”

Literature defines policies in various shapes and formats, but one of the most popular ones is “what government (any public official who influences or determines public policy, including school officials, city council members, county supervisors, etc.) does or does not do about a problem that comes before them for consideration and possible action” (Martinez, 2022). For the purpose of this paper, I operationalize the concept of “policy prioritization” by considering as relevant policies the Government Programmes (which are mandatory documents for the parliamentary approval of all governments, published in the Official Gazette), the National Energy Strategies and relevant pieces of primary legislation. I consider the following to be relevant national legislation: the Electrical Energy and Natural Gas Law 123/2012 (with its various subsequent changes) and the Law for the Establishment of Social Protection Measures for the Vulnerable Energy Consumer 226/2021. To assess the degree of policy prioritization I looked primarily and coded the number of times either the concept of “vulnerable consumer” or “energy poverty” appeared in the aforementioned public policy documents, and I also described the evolution of the policy instruments applied at national level for the protection of vulnerable energy consumers and for addressing energy poverty.

2. Methodology

The hypothesis I am testing in this article is that “the higher the policy prioritization of energy poverty in Romania, the more increased support for vulnerable energy consumers”.

To test the hypothesis, I am employing on the one hand qualitative methods, such as discourse analysis (of Prime Ministers and Ministers of Energy) and document analysis (examination of national energy strategies and government programmes in the past ten years, as well as of energy laws and/or other pieces of primary legislation addressing energy poverty and the vulnerable energy consumers). On the other hand, I am using descriptive statistics, by analyzing public budget spending with social transfers to vulnerable consumers – analyzing the datasets made publicly available by the Ministry of Labour and Social Solidarity. I then do a correlation between the occurrence of references to energy poverty and vulnerable energy consumers in policy and legal documents and in public officials’ discourse with the level and coverage of actual state support for vulnerable consumers.

3. Data analysis and findings

By examining the issues of the Official Gazette in the past ten years, I identify in Table 1 the occurrence of references to either of the concepts in the officially approved Government Programmes.

Table 1. Occurrence of references to “vulnerable consumer” and “energy poverty” in National Government Programmes

Adoption Date	Time horizon of Government Programme	Publication reference	No. of references to “Vulnerable energy consumer”	No. of references to “Energy poverty”
22.12.2008	2009-2012	MOF 9869/22.12.2008	0	0
23.12.2009	2009-2012	MOF 907/23.12.2009	1	0
09.02.2012	2012	MOF 907/23.12.2009	0	0
07.05.2012	2012	MOF 302/7.05.2012	1	0
21.12.2012	2013-2016	MOF 877/21.12.2012	5	0
14.03.2014	2014	MOF 185/14.03.2014	2	0
17.11.2015	2015-2017	MOF 853/17.11.2015	0	0
04.01.2017	2017-2020	MOF 5/4.01.2017	1	0
29.01.2018	2018-2020	MOF 84/29.01.2018	1	0
04.11.2019	2019	MOF 888/4.11.2019	5	1
14.03.2020	2020	MOF 208/14.03.2020	5	1
25.11.2021	2021-2024	MOF 1122/25.11.2021	11	4

Source: Author’ own research.

Data thus clearly demonstrate that the most politically significant policy document – the Government Programme – has started to address the two concepts, in an increasing fashion, over the past ten years. While references to vulnerable energy consumers also occurred during some social-democrat governments in 2012-2014, as an exception, in general it was only the past three Government Programmes that started to intensify the references to this population. Furthermore, the current government programmes bring references to vulnerable energy consumers no less than 11 times, compared to maximum 5 references in the previous years. Energy poverty, on the other hand, seems to have been a rather absent concept in Government Programmes from 2008 to 2019 and it became acknowledged and addressed as a phenomenon, politically prioritized as such in the Government Programmes from 2019 onwards.

The concrete policy and legislative measures which address energy poverty and the vulnerable energy consumers evolved as follows. Before 2020 the end-use price for natural gas was regulated for all households, irrespective of their vulnerability status. A similar regulation has been in place until 2021 for household electricity prices. Nonetheless, policy documents as early as 2010 (e.g.: The Energy Strategy Elements for 2011-2035) or 2011 (e.g.: The Energy Strategy of Romania for 2007-2020, reviewed for 2011-2020) were already stipulating that vulnerable energy consumers must be supported through direct mechanisms and even that the existing mechanisms in place at the time (e.g.: the social tariff for electricity, the local subsidies for district heating) must be replaced only by targeted support measures for vulnerable consumers. Despite this early awareness, consumer protection through end-user regulated prices no matter their vulnerability level remained the norm for many years in Romania. In the years 2016-2017, due to these market regulations, households were enjoying some of the lowest prices in the EU both for

electricity and for natural gas. However, as policy documents testify (National Energy Strategy 2016), in 2016 40% of Romanian citizens were in energy poverty (following the individual budget thresholds that qualify citizens for individual heating subsidies based on the definition in Law 196/2016 for the minimum income for inclusion), largely due to a GDP/capita below the EU average and the highest income distribution inequality in the EU.

In 2012 the Law on Electricity and Natural Gas was adopted, with a definition for the “vulnerable consumer”, which remained by and large valid ever since: “the final customer that belongs to a category of household customers that, due to age, health state or low income are in risk of social exclusion and who, in order to prevent that risk, benefit from social protection measures, including financial means”. The same law, however, was prescribing that the qualification criteria and the social protection measures be established by subsequent legislation. This did not happen for several years, at least until 2016, when an incomplete set of qualification criteria and support tools were established through Law 196/2016 on the minimum inclusion income. Basically, as per this law, the only set of protection instruments available for those under a certain income threshold per family were the so-called heating subsidies. Literature also confirms this (Şinea et al., 2018).

At the same time as this law on the minimum income for inclusion was approved, the National Energy Strategy (2016) was describing energy poverty as a “structural problem”, not one related to high energy prices. The Strategy also offered a national definition of “energy poverty”, namely “the inability of households to heat their homes sufficiently and/or to cover the expenses with basic energy services”. It also used other definitions and clarifications of what energy poverty is, using definitions employed in academic literature. In 2016 the beginning of the policy prioritization of this matter as reducing energy poverty and protecting the vulnerable consumer was considered one of the five major strategic objectives of the National Energy Strategy. The concept of selective protection measures was introduced, and the action prescribed was the targeting of vulnerable consumers with support measures high enough to offer real protection. Financing the modernization of heating systems was considered a medium- to long-term priority for protecting the vulnerable consumer. Additionally, increasing the quality of the communication between suppliers and consumers was envisaged as a consumer protection measure. The strategy proposed the continuation of the social tariff for electricity or the identification of alternative measures with similar effects. The 2016 strategy is, to date, the only official policy document that offers a quantification of the phenomenon of energy poverty. The strategy identifies 100.000 households without electricity access and between 510.000 and 1.5 million households in energy poverty. Based on econometric modelling and using a relatively stringent notion of energy poverty, the strategy estimates that energy poverty will reduce to about 940.000 households in 2030 and 330.000 households in 2050.

In 2018 the new leadership of the Energy Ministry published a new energy strategy (National Energy Strategy 2019-2030), which continues the focus, albeit in less detail, on energy poverty and the vulnerable energy consumer. Out of the eight strategic objectives of the strategy, one is about energy poverty, while out of the 23 operational objectives two focus on this problem: thermal renovation programmes for energy poor collective buildings and

communities; protecting vulnerable consumers through adequate social support measures, such as heating benefits, the social tariff for electricity and public service obligations.

2019 brings again not only new leadership in the ministry, but also another revision of the national energy strategy (National Energy Strategy 2020-2030). Out of the eight objectives of the strategy one focuses on energy poverty, while the concrete measures are a repetition of the ones contained in the previous edition of the strategy, plus one addition, namely “the regulation of the legal statute and regime of the vulnerable consumer”.

Two milestones were reached in 2021, when Law 226/2021 on the social protection measures for the protection of the vulnerable energy consumer is passed. The law however does not bring substantial changes compared to the previous framework, in the sense that the heating benefits remain almost the only concrete protection measure for vulnerable consumers. Other types of financial benefits are defined (e.g.: the energy supplement, for covering energy needs during the whole year, not just during the cold season; support for purchasing energy efficient home appliances; support for purchasing products and services for energy efficiency), but not mandated, except for the energy supplement, where the law prescribes clear income thresholds that act as qualification criteria for obtaining the supplement. The definition for energy poverty and the vulnerable consumer is slightly changed, through the introduction of the concept of “minimal energy needs”, but to date this enriched definition has not been operationalized, in the sense the Ministry of Labour did not define, together with the National Energy Regulatory Authority and the National Statistics Institute, what are the concrete parameters of these needs, as stipulated in the law (Art. 3). The second milestone was the approval of the National Integrated Energy and Climate Plan (NECP), which clarifies that the main responsible for addressing the issue is the Ministry of Labour and Social Inclusion, in charge since 2012 of drafting the National Action Plan on Energy Poverty (not drafted to date). The plan was supposed to cover which clients cannot be disconnected from the grid and how operators will be compensated. Other measures for the protection of vulnerable energy consumers, according to NECP, are the legal definition and clarification of its statute, as well as financing mechanisms for the protection measures, the possibility for paying the electricity bill in installments, the application of the National Social Assistance IT system (which, according to NECP, once operational will help direct the universal subsidy paid by local authorities for all households connected to the district heating only to the vulnerable ones), heating subsidies for vulnerable consumers and the possibility (legal since 2012) to set up a solidarity fund for financing vulnerable energy consumers.

One year later, namely in 2022, another version of the national energy strategy was published (National Energy Strategy 2022-2030), which maintains the same focus as the previous versions. The novelties are the following: just energy transition measures in affected regions are included in the energy poverty policy area; the expansion of the gas and electricity grids, including electricity microgrids, are seen as priority actions for alleviating energy poverty. A different set of indicators for measuring energy poverty are introduced, namely the percentage of utility bills arrears for households (13.9% in Romania in 2020 vs. 6.2% in EU27) and the subjective indicator of the ability to keep the house warm, where Romania scores only slightly worse than the European Union (10% vs. 8.2%).

The table below bring evidence to the policy prioritization of these twin phenomena through a document analysis performed on the National Energy Strategies adopted or published for consultation in the past ten years. As the table shows, there has been an increased policy prioritization of vulnerable consumers and of energy poverty in the past ten years, with the highlight being achieved in 2016.

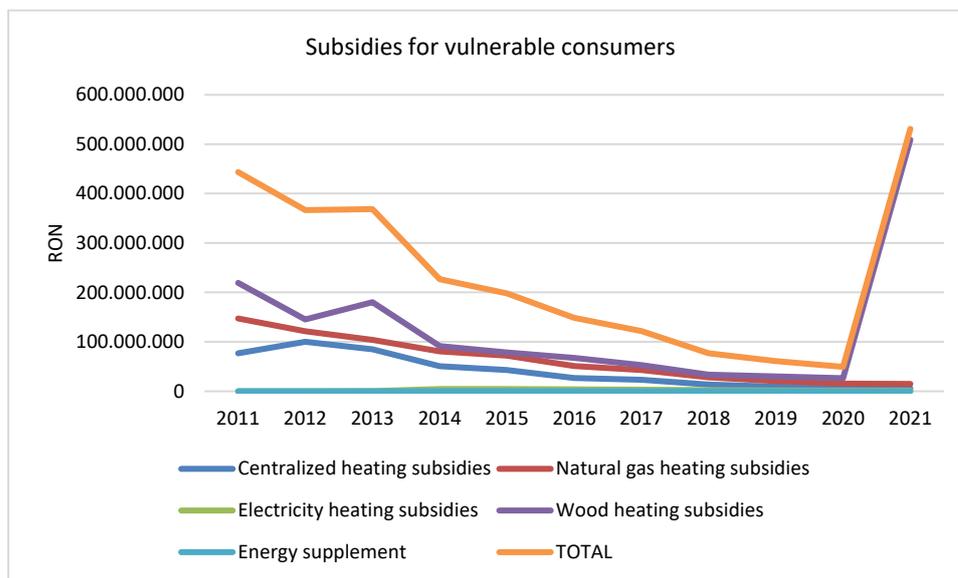
Table 2. Occurrence of references to “vulnerable consumer” and “energy poverty” in National Energy Strategies

Approximate draft publication date ⁽³⁾	Period covered	No. of references to “Vulnerable energy consumer”	No. of references to “Energy poverty”
21.04.2011	2011-2035	1	0
20.08.2011	2007-2020 (updated for 2011-2020)	6	0
19.12.2016	2016-2030	27	53
03.09.2019	2019-2030	7	10
01.11.2020	2020-2030	18	19
01.08.2022	2022-2030	11	21

Source: Authors’ own research.

Despite the increased policy prioritization of these two topics, the only means of support offered concretely have been the heating subsidies and the energy supplement (after 2021) – both disbursed by the Ministry of Labour, through the County Directorates for Social Benefits and Social Inspection. There have been other forms of support in the energy sector, such as end-user regulated prices or municipal-level subsidies for district heating, but these had a general applicability and did not address vulnerable consumers specifically. The graph below shows the evolution of the only instruments that have targeted vulnerable consumers in Romania in the past ten years.

Figure 1. The evolution of heating subsidies for vulnerable energy consumers

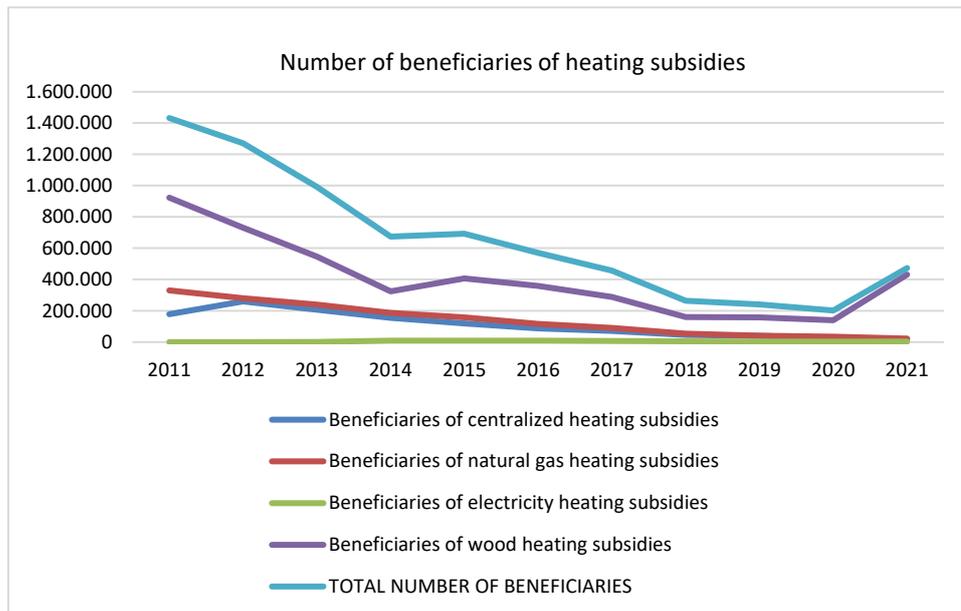


Source: Authors’ own research, based on data collected from the Ministry of Labour and Social Solidarity.

As the figure below shows, between 2011 and 2020 the support offered to vulnerable consumers has decreased constantly, from approx. 440 million RON in total benefits in 2011 to 49 million RON in 2020 – in short, a tenfold decrease. This occurred despite the fact households which use electricity as their main source of heating started to be added as eligible beneficiaries in 2013. The downwards trend persisted also in 2021 for all fuels (district heating, gas, electricity), except wood, which encountered a dramatic increase, from 26 million RON in 2020 to over 500 million RON in 2021. What led to such a fantastic increase in 2021 was the change introduced through Law 226/2021, which introduced a significant difference in the way the heating benefit for wood was calculated. An explanation for this decision is the fact that the price of firewood doubled in 2021 in contrast to 2020, as media articles show. There is no official aggregated statistics on the evolution of the firewood prices, as this indicator is not reported to Eurostat.

In terms of the number of beneficiaries, as the Graph below shows, there has been a clear decrease over the past ten years for all types of heating. There decrease is six-fold in terms of total number of beneficiaries between 2011 and 2020 and even three-fold between 2011 and 2021, despite the impressive spike in the number of beneficiaries of subsidies that use wood for heating and receive benefits between 2020 and 2021.

Figure 2. *The evolution of the number of vulnerable consumers benefitting from heating benefits*

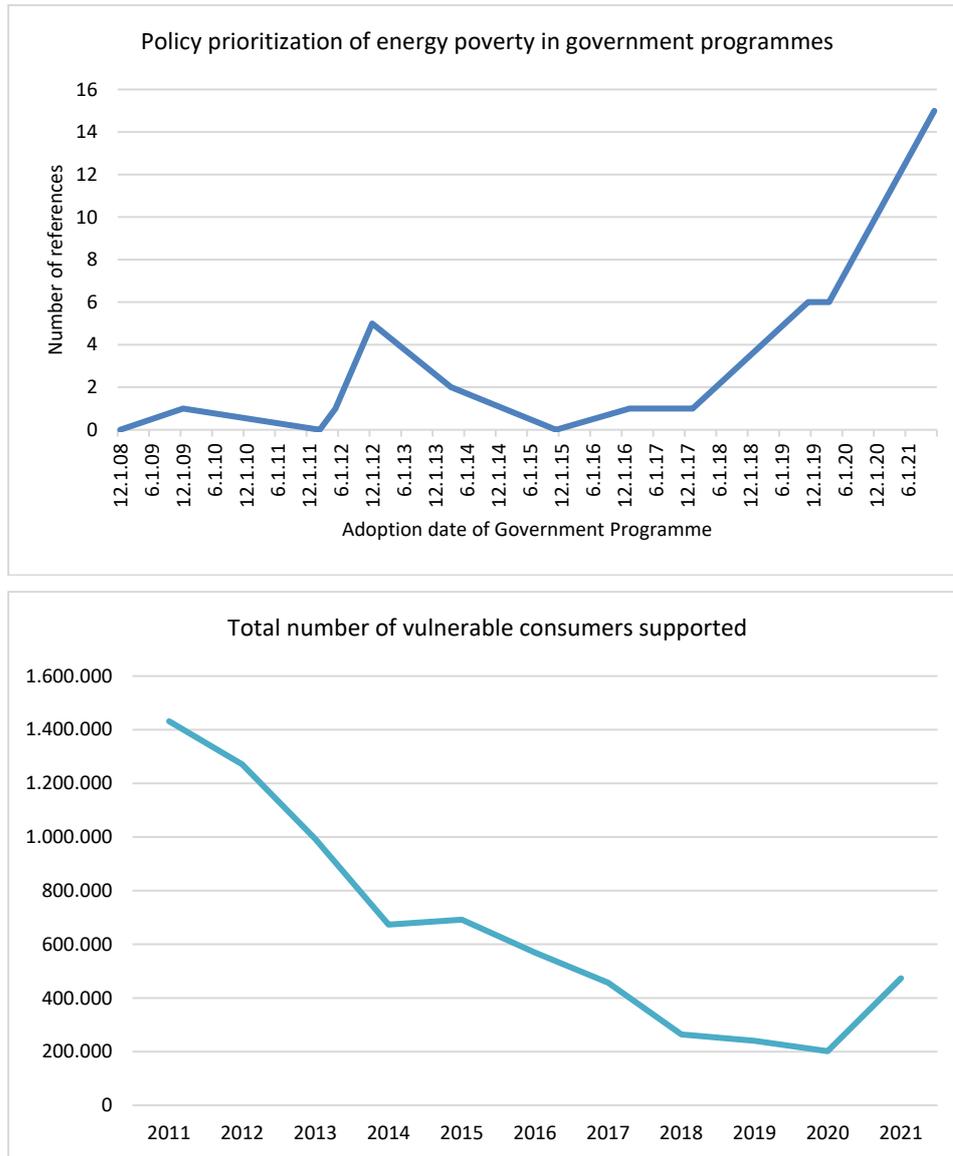


Source: Authors' own research, based on data collected from the Ministry of Labour and Social Solidarity.

When one interprets the two sets of data together, the conclusion is clear. The higher the policy prioritization of energy poverty and the vulnerable energy consumer, the lower the actual concrete benefits for these underprivileged categories – both in terms of coverage and amounts of benefits. On the other hand, this may signify the immense lag as well between the moment a certain topic gains traction on the public agenda and the moment

the policy-making apparatus drives tangible benefits for citizens. This is worrisome as it testifies to a lack of administrative capacity of translating political and public objectives in policies that impact citizens. The figure below indicates the strange case of policies addressed at the vulnerable consumers in Romania, where the more prominent an item is on the public agenda, the less it can translate to tangible impact for citizens.

Figure 3. *The inverse relationship between policy prioritization and actual support for vulnerable energy consumers in Romania*



Source: Authors' own research, based on data collected from the Ministry of Labour and Social Solidarity and on policy documents text analysis.

Conclusion

This article has investigated the policy issue of energy poverty and of the vulnerable energy consumer, presenting in detail the evolution of this topic in Romania and investigated whether policy-making and policy prioritization of these twin issues led to actual quantifiable results for vulnerable energy consumers. As method, I used document analysis, codifying and quantifying the references to these issues in the main policy documents at national level, namely the Government Programme and the National Energy Strategy. The results are surprising. Indeed, these two issues gained policy and political traction and their policy prioritization grew exponentially in the past ten years. Unfortunately, there is an opposite trend in terms of the actual support that vulnerable consumers have received, both in terms of the coverage of benefits and their general amount. Paradoxically, the more a policy topic is prioritized, the less the capacity of decision-makers and public administration to deliver tangible results for citizens in that policy area. This is what I metaphorically called “the curious case of schizophrenia in Romanian policy-making”. The implications of the finding are overarching, for policy-makers and business representatives equally, as it can signify several, equally worrisome, meanings: either that politicians are completely deceptive, in the sense that the more they claim to address a social and economic issue, the less they actually do it; or that public administration and the policy-making process doesn’t have capacity to follow political priorities genuinely, assuming they are genuinely decided upon by politicians. In any case, a lag of more than nine years between a moment an issue starts to feature as a priority on the policy agenda (both concepts started to gain public traction roughly in 2013) and the moment the achievement status of that policy priority stops its deterioration (it was in 2021 that the total amount of benefits started to reverse its downright spiral due to the increased support for vulnerable consumers that use wood for heating) is a serious threat for a competitive business and economic environment, with shared prosperity for all citizens.

Notes

- (1) The M/2 indicator represents the share of households whose absolute energy expenditure is below half the national median – i.e. abnormally low.
- (2) The 2M indicator represents the proportion of households whose share of energy expenditure in income is more than twice the national median, and has been inspired somehow by UK’s 10% threshold (Radamaekers et al., 2016).
- (3) Some of the versions of the National Energy Strategy were not adopted, but instead heavily publicized and opened for public consultation. For the purpose of the current conceptualization of policy prioritization, I focus on a document/discourse analysis, for which the difference between adoption and publication is not major. Due to poor digitalization of public administration, many of these versions are not public on the ministry’s website, but instead in third party publications.

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