

FUEL POVERTY ACTION

CONSULTATION ON INVOLUNTARY PREPAYMENT METER INSTALLATIONS

26 July 2023

We have already provided a comprehensive response to Ofgem's "PREPAYMENT RULES AND PROTECTIONS CONSULTATION". We detailed the serious risks of harm when prepayment meters are forced on people who cannot afford to feed the meters - leading to disconnection and dangerously underheated homes.

We realise Ofgem lacks the powers for a permanent ban, but are shocked that you appear to be rushing to restart forced installs before there is time to bring in legislation for a permanent ban. And the timing just ahead of winter means the greatest risk of harm.

You have asked for feedback on the proposed protections. These weak protections seem to be based on a false assumption that most people will not be harmed if they are unable to maintain supply. We believe this is false. **An unheated home in winter means dangerously low temperatures which can have serious consequences even for those without specific medical conditions. And Ofgem choosing 85+ as the age cut off for banning forced installs is an extreme choice that puts almost all pensioners at risk.**

There is no sign that the energy firms will behave better after being exposed in the prepayment meter scandal. British Gas promised to thoroughly investigate all installs but later admitted they had only investigated a small sample. And even now when warrants and installs are banned, firms continue to send letters to customers threatening warrants and forced installs. They have continued to harrass and mislead, even when told to back off.

Ofgem allowing forced installs again risks serious harm and continued abuse of power by energy firms.

Research for the [Warm This Winter campaign](#) suggests that as many as two-thirds of PPM customers could be classed as vulnerable with many of these spending winter 2022/23 in cold damp homes.

- Cold homes can cause and worsen respiratory conditions, cardiovascular diseases, poor mental health, dementia and hypothermia ([Institute of Health Equity](#)) as well as cause and slow recovery from injury ([PHE](#)).

- Fuel poverty impacts people's physical health by causing higher levels of inflammation, measured by fibrinogen, a blood-based biomarker. Elevated fibrinogen levels have been strongly linked to higher risk of coronary heart disease, heart attacks, stroke and an increased risk of death ([UEA](#)).
- Living in non-decent, cold or overcrowded housing and in unaffordable housing are further key drivers of increased stress and a reduction in a sense of empowerment and control over one's life, and in turn of depression and anxiety ([Gibson et al.](#)).
- In a study of young people aged 11-18, more than one in four who lived in cold damp homes were at risk of developing mental health problems, in comparison to 1 in 20 who had a history of living in warm housing ([Geddes et al.](#)).
- A report by the [Money and Mental Health Policy Institute](#) highlighted the impact of the cost of living crisis on the public's mental health. One expert by experience told researchers, "I can't sleep at night for worrying, I keep crying and wonder how I'll manage to keep going. I'm staying in bed a lot more, even though I'm not sleeping, as I'm scared to go out and spend money, and scared to heat the flat when it's cold."
- A [Public Health England report](#) found that cold homes and poor housing conditions have been linked with a range of health problems in children.
- A [Childhood Trust report](#) found that fuel poverty can also have a number of indirect impacts, such as lower rates of educational attainment in school, and a strain upon young people's mental health.
- The [British Medical Journal](#) reports that "children growing up in cold, damp, and mouldy homes with inadequate ventilation have higher than average rates of respiratory infections and asthma, chronic ill health, and disability. They are also more likely to experience depression, anxiety, and slower physical growth and cognitive development."
- A third of disabled adults saying their impairment or condition has a significant impact on their energy costs. The impact of this is severe, with half of disabled people are not planning to use heating, even when cold, and more than a third cutting back on food and skip meals. ([Scope](#)).

The proposals attempt to massively reduce the number of people considered to be vulnerable, which puts millions of people at potential risk of harm.

In addition to the widespread suffering that forced installs cause, the financial costs on the NHS and care system of illnesses, hospitalisation and ongoing care need to be included in any financial assessments. For example, illnesses linked to cold, damp and dangerous homes cost the NHS more than £2.5 billion a year ([IHE](#)).

For all these reasons, we strongly urge Ofgem to re-think this dangerous plan which will create a winter of misery, illness and deaths. Many lives depend on you.

Fuel Poverty Action

<https://www.fuelpovertyaction.org.uk/>