

The Plymouth Energy Community (PEC) response to Ofgem's Consumer Standards Statutory Consultation

About us

Plymouth Energy Community is a charity with ten years' experience providing energy advice and support services in Plymouth, to enable people to heat and power their homes affordably, with a particular focus on support for fuel poor households in vulnerable situations. It has grown to deliver internationally recognised programmes in fuel poverty, community-owned renewable generation, housing, and energy efficiency. PEC has supported more than 30,000 residents most vulnerable to fuel poverty through:

1. One to one casework and crisis support in the home, the community and over the phone.
2. Increasing individuals' understanding and confidence to manage energy issues independently.
3. Promoting prevention of fuel poverty and its early identification through free training to frontline staff.
4. Supporting the local authority to target its energy funds more efficiently.
5. Improving homes by combining funding opportunities to supply simple and large-scale energy efficiency measures.

PEC's Energy Team is highly skilled in energy advice, and all staff have completed a Level 3 City and Guilds in Energy Awareness, along with a programme of training in community work that safeguards residents and the team.

PEC's Response

PEC is a member of the Southwest Devon Community Energy Partnership, and we participate in networks that work towards securing consistent help for Domestic Customers in Vulnerable Situations. We do this alongside organisations such as the Centre for Sustainable Energy (CSE), 361 Energy, Exeter Community Energy (ECoE) and National Energy Action (NEA). As such, we strongly endorse the points raised within the CSE response to this consultation, that ask for:

- *A consistent approach to gaining authority from energy companies.*
- *A clear place on energy company records for the advisor's name to be added.*

In addition, PEC urges Ofgem to:

- Include as a licence condition, the clear directive for all energy suppliers to publish a **Community Support Access Strategy** to improve relations between support and community organisations, and energy suppliers.

We also support CSE's more detailed actions on the consultation questions and provide evidence on the impact of current energy supplier practices for points 7 and 8.

Question 1: Do you have any comments or questions on our proposed licence changes to improve supplier contact ease?

Ease of Access – free enquiry services

1. *All suppliers should provide freephone numbers to minimise the cost burden on vulnerable customers.*
2. *General helpline service levels need to improve – with better training for staff, longer opening hours and ensuring all staff can access the systems for enquiries they need.*
3. *A recommendation to include the following markers of vulnerability:*
 - *Being a member of the Priority Service Register.*
 - *Being financially vulnerable i.e., their income being insufficient to meet their required energy costs to keep adequately warm.*
 - *Being digitally excluded and therefore unable to access other means of communication with their supplier e.g., email or webchat.*
4. *The call to add a license condition to make the provision of accessible language services a requirement.*
5. *A move to standardised energy bills to make it much easier for people to find the information they need.*

Question 2: Do you have any comments or views on our proposed contact ease guidance document? We would welcome evidence of ways in which suppliers are already delivering best practice.

6. *The Suggestion to widen the definition of customer representative, giving an example of DWP definitions:*
 - *advice or welfare rights organisations.*
 - *professionals such as social workers, community nurses or doctors.*
 - *family members or friends.*
7. *We share CSE's disappointment that several suppliers suggest or are implementing guidelines that limit a support role to Citizens Advice.*

Point 7 evidence - EDF case study:

PEC advisors have been facing increasing difficulty in accessing vulnerable customer teams. EDF is one organisation restricting access to Citizen's Advice workers. We were previously able to access the vulnerability team at the supplier.

We raised this with EDF who responded by email:

Thank you for taking the time to speak with me regarding your request to set up a more direct route into our call centre to help assist with the referrals you receive from external support groups such as local food banks.

Following our meeting I had met with the senior leadership team and unfortunately at this time we would be unable to accommodate this request. My team currently supports the Extra Help Unit, CAB Plymouth and the Citizens Advice Bureau and would struggle with any further volumes into the team considering the current energy crisis.

I appreciate that this news is disappointment (sic) and understand the frustrations met when trying to contact us however I would recommend referring these cases to CAB Plymouth who will be able to assist or if they require any further support they can reach out to the team.

Thank you again.
Team Manager
Extra Help & Vulnerable Customers

We asked Luke Pollard MP, Member of Parliament for Plymouth Sutton and Devonport to raise the issue with the supplier. EDF again declined. Luke provided the following update by email.

Thank you for getting in touch with me about the issues that PEC have with accessing EDF's vulnerable customer team. I know about the important work that you all do and so, firstly, want to thank you, and secondly, wanted to help as much as I can.

As you know, I contacted EDF's Executive Liaison team and asked them to review their decision and they have sent me the following reply:

We understand that PEC are frustrated with not having a direct route of contact for EDF and I'm sorry for any confusion, we complete onward referrals to Citizen Advice Bureau (CAB) to help support our customers but EDF should be the first contact for anybody with concerns about their bills or consumption. Our customer service advisors are on hand on a range of channels with a host of tools to be able to answer any complex queries that should arise.

Our Senior Leadership Team have made the decision that the PEC request is not something we can accommodate at this time. While appreciate (sic) the work that PEC does to assist customers with their energy concerns, we have a dedicated team of customer service agents who can deal with any query related to a customer's energy usage.

We offer advice and assistance to a host of agencies who are committed to assisting customers and providing a direct contact for PEC would essentially mean that we would be prioritising PEC concerns over others and with limited resourcing this is something we cannot accommodate at this time.

Taking resources away to provide a direct contact for PEC could in turn mean a longer wait for potentially vulnerable customers who we have a duty of care to assist. Please be assured that EDF are committed to assisting our most vulnerable customers in first instance.

I am really sorry that this is not the result either of us could have wanted, but if there is anything further that I can do to support the incredible work that you do, please let me know.

Best wishes,
Luke

Luke Pollard MP

Labour and Co-operative Member of Parliament for Plymouth Sutton and Devonport

We believe responses like these are short-sighted and prevent support and community organisations from resolving issues alongside suppliers quickly. It leads to significant time wasted and increases the burden on Citizen's Advice who often refer complex cases back to PEC, and organisations like it, to resolve. It also increases call volumes for energy supplier general line staff, who are unable to assist at the level needed by people in very vulnerable circumstances.

8. *We agree with the call for energy supplier staff to show less blame and more compassion in pursuit of utility debt, 'we don't approach vulnerable households with an attitude of blame, and neither should suppliers.'*

9. *Also an end to additional charges and late payment fees, which do nothing to help vulnerable customers in debt.*

Point 8 evidence - case study 1:

PEC is supporting a customer of OVO. The woman is in her 70's, has health conditions and is on means tested benefits. The supplier is currently trying to reclaim an erroneous debt of £4,500. There is a dial meter in her home that she read incorrectly in July – starting the reading with a 6 instead of a 5. This dial reading error is so commonly made, that it is covered in the Level 3 City and Guilds in Energy Awareness; a qualification all PEC staff hold. Despite this, no error was suspected by the supplier and OVO did not call the client to check the reading. The debt was passed to the Collections team in South Africa.

The Collections team is now pursuing her for the debt and, in her words, have threatened to ruin her credit rating, take her to court, instruct bailiffs and force entry. The client has never been in debt and is 'terrified'. She has explained to OVO that she lives alone, and barely uses her heating. She does not have internet or a TV.

We are attempting to resolve this obvious error so that it stops causing her unbearable stress. On submitting a Form of Authority, the Collections team refused to add our advisor to the account. When asked to read out the last note on the system, it was an instruction from the client herself: 'Please add (name) from Plymouth Energy Community to my account so she can help with a complaint'. The operative said this was not enough and the client needed to be in the same room as the advisor when asking to add them to the account. This is both obstructive and impractical. On raising a complaint, we were put through to a UK based call centre, where we are now starting to make progress.

Point 8 evidence - case study 2:

PEC is supporting a customer of Scottish Power. She came to the service in January 2023 asking for help to add her name to an existing gas account, after being in the property for 6 years. She had been using a card prepayment meter to pay for her usage. There are meter identification issues here, for which we have gathered all information requested by the supplier. This required arranging images of the meter, gathering tenancy evidence and coordinating engineers from Wales and West to attend. The engineers concluded the issue is with the supplier. As yet, no engineer from Scottish Power has attended, and no resolution has been found. In addition, the 'advisor only line' we are able to access, does not take ownership of complex cases or cases that move to complaint.

As a result:

- Scottish Power has mistakenly opened a credit account – resulting in a debt that the Collections team is now chasing the client for.
- Our advisor needs to mediate between the advisor line, Home Move, Collections and Complaints teams, often resulting in requests for repeat information, due to gaps between systems.
- We have had to establish work arounds, such as asking the advisor line to email the Complaints team to request that they call us.
- Call wait times are so long that the advisor is unable to hold and is directed to Whatsapp before being cut off.

As a result of these access difficulties, Scottish Power Collections are chasing immediate payment on an invalid debt. They have informed the client that they will move to apply for a warrant to install a pre-payment meter. The client has been on a prepayment meter with the supplier for 6 years and failure to acknowledge this is the source of the complaint.

Question 4: Do you have any comments or questions on our proposed licence changes to require suppliers to publish information on their customer service performance, as measured by Citizens Advice?

10. We also welcome the proposals to require suppliers to publish information on their customer service performance. Transparency is an essential component of improving the retail market.

Question 5: Could you provide any further, detailed evidence on the potential costs and benefits of our revised proposals?

We echo CSE's note that *additional costs borne by an energy supplier to provide adequate customer service will reduce costs for others i.e., the customer themselves, the network operators and organisations representing vulnerable customers.*

We also welcome work to improve standards in access for energy customers. However, Ofgem's ease of contact guidance does not go far enough in mandating a structure within which energy suppliers must improve access for those *acting on behalf of Domestic Customers in Vulnerable Situations.*

"We would expect suppliers to have processes in place to easily facilitate a person or organisation contacting a supplier in the interest of and on behalf of a Domestic Customer in a Vulnerable Situation. This includes supportive organisations such as Citizens Advice, Advice Direct Scotland and other customer support and debt advice organisation. Suppliers should have processes to identify and prioritise enquiries from representatives contacting them on behalf of Domestic Customers in Vulnerable Situations that require immediate assistance (1.69)^[1].

We urge Ofgem to include an additional license condition, that states all energy suppliers must publish a **Community Support Access Strategy**. This is the method by which they commit to provide access to advice and community workers, supporting Domestic Customers in Vulnerable Situations. We want to see a strategy published annually, by each energy supplier, so that support and community organisations gain clear oversight to improve access immediately.

The **Community Support Access Strategy** should include:

- Phonelines for advice and community workers.
- Direct access by email and phone to vulnerability teams.
- Details on accessible language services and translation.
- Clear guidance on how to gain 'permission to act' via a Form of Authority (for those digitally excluded), or through an email from the customer.

We recognise that energy suppliers are likely to feel embattled, due to the current demand on their services. It is important to us that our relationship with them is not adversarial. Advice and community organisations work tirelessly to resolve energy issues, supporting customers in the most vulnerable of situations. In the current system, PEC advisors spend hundreds of hours each year in call queues, on hold between departments or redialling following disconnection from general customer service numbers. This is inefficient and reduces our capacity to support other Domestic

Customers in Vulnerable Situations. It also hinders any benefit from resolving complex issues alongside suppliers.

The benefits of publishing a **Community Support Access Strategy** each year are:

- More efficient access for advice and community organisations to energy suppliers, releasing capacity to support more people in fuel poverty
- Suppliers will see a greater number of billing and complex issues resolved quickly, releasing general customer service operatives, and helping to reduce call waiting times
- Less cases resulting in deadlock or referrals to the ombudsmen
- A positive culture of partnership working between suppliers and community advice organisations, where innovation can thrive.

Question 6: Could you provide detailed evidence or information on the proposed timescales for implementation of our revised proposals?

No, but we would like to see proposals introduced in time to allow improvements for the winter season.