

23/08/2023

Dear Jemma Baker,

My response to this consultation focuses on the first two questions:

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

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.

In doing that, I will be raising a holistic suggestion which can be realised via cross-sector working of regulators¹ and cross-scale government departments.

1. Supplier contact ease needs to ensure the use of different communication methods with the customers.

Suggested timelines to contact customers in payment difficulty are fine. However, the suggested change to SLC 27.5B does not specify what communication means the supplier needs to use when contacting their customers. It is important to ensure that suppliers use several contact methods including post, phone call or emails. This is in line with the suggestions proposed in 31G.3A. In our ongoing project², we've identified particular communication challenges minority ethnic households have been facing. For selected companies, we found that suppliers and DNOs have been following different practices in recognising language as a criteria for eligibility in priority services register (PSR) (Table 1).

Table 1. Review of selected energy company practices to recognise communication needs as a criteria for inclusion in PSR (as of 11/7/2023)³

Name	Organisation type	Multilingual website	Inclusion of language in PSR	Listing of intermediary websites
British Gas	Supplier	YES	NO	YES
EDF	Supplier	NO	NO	YES*
E.ON next	Supplier	NO	NO	YES
OVO Energy	Supplier	NO	YES	YES
Shell Energy	Supplier	NO	YES	YES
So Energy	Supplier	NO	NO**	YES
Utilita	Supplier	YES	YES	YES

¹ This could be taken forward by [UK Regulators Network](#)

² The Protecting Minority Ethnic Communities Online ([PRIME](#)) project is funded by UK Research and Innovation (UKRI) through the Strategic Priority Fund

³ Nazmiye Balta-Ozkan and Zinat Aboli (2023) Service Provider Perspectives, PRIME Project Energy workshop, London, 12/7/2023

Octopus Energy	Supplier	NO	YES	YES
SSEN	DNO	YES	YES	YES*
Scottish Power	DNO	NO (only Welsh)	YES	YES
ENWL	DNO	YES	YES	YES*
Northern Powergrid	DNO	YES	YES	YES*
UK Power Networks	DNO	YES	YES	YES*
National Grid Electricity Distribution	DNO	NO	YES	YES*

* These companies not only have listed intermediaries on their website but also have a tie-up with Citizens Advice

** Language is not included in the list of special requirements but does mention “or for another reason not listed”

2. Energy sector digitisation is part of the wider societal digital skills journey.

Achieving the government’s ambition of a full decarbonised power grid by 2035⁴ in a cost-effective way will be contingent upon the digitisation of energy system, from customers to generators to suppliers and network operators. An expert workshop we held in London recently noted the need for all energy customers to become digital (Balta-Ozkan et al., 2023)⁵.

Yet, the ‘digital exclusion’ report by the House of Lords (2023)⁶ notes that 2.4 million households do not have the skills to complete a simple online task. One of the key findings of our workshop is the need for education becoming more real world oriented so that everyone is equipped with basic **digital literacy skills**. Hence, digitisation of energy systems needs to be considered within the wider societal setting.

As customer participation is essential to ensure the cost-effective operation of a low carbon grid, I propose that all regulators come together to agree on the components of a ‘**societal skills for a digital journey**’ training programme that can be launched by the government. This training needs to take into account key differences in cognitive, socio-economic, technical and financial abilities of individuals as well as those across the sectors.

Such a training programme can be implemented by cross-scale government departments (UK government, devolved administrations, and local authorities) and community organisations. Only such a societal programme can make a step change to mitigate ‘digital exclusion’ risks and embed public sector ‘inclusivity’ ethos into the private sector.

I will be more than happy to discuss any of these points in more detail in due course.

Yours sincerely,

Prof Nazmiye Ozkan

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⁴ <https://www.gov.uk/government/publications/net-zero-strategy>

⁵ N. Balta-Ozkan, Z. Aboli, G. Netto, S. Hasan, S. Haben, R. Dobson (2023) Tackling racial inequalities and digital discrimination in the design and delivery of digital energy services, PRIME Project Workshop Report, Cranfield University, August 2023.

⁶ <https://publications.parliament.uk/pa/ld5803/ldselect/ldcomm/219/219.pdf>