

## Mhairi Bruce

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**From:** Retail Stakeholder Team  
**Sent:** 14 August 2023 14:30  
**To:** Future Consumers  
**Subject:** FW: attt Jemma Baker Consumer standards statutory consultation [OFFICIAL Internal Only]

Hi Mhairi,

See below from RST inbox.

Thanks,

Ross

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**From:** Douglas Stewart <douglas@100green.com>  
**Sent:** Friday, August 4, 2023 11:39 AM  
**To:** Retail Stakeholder Team <RetailStakeholderTeam@ofgem.gov.uk>  
**Subject:** attt Jemma Baker Consumer standards statutory consultation

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Dear Jemma

### Consumer Standards Consultation response

Our response to the specific consultation questions is below, however we would like to make the following points in addition.

We understand the need for customers to contact their energy supplier.

We also understand that the vulnerable may be at more risk than others.

But surely the issue is ensuring consumers, particularly the vulnerable don't go off supply other than during a power cut. This could be mandated or a licence condition could be introduced that a PPM customer cannot be taken off supply between 20.00 and 08.00 or at weekends, which could correspond to 'friendly credit' hours. This would provide protection without pushing a huge financial penalty on suppliers.

Indeed, if there is an issue with a traditional PPM meter, the supplier cannot do anything without the MIP being open, which they won't be before 09.00 or after 17.00 weekdays and all weekends. So it could be argued that this proposal is more about the optics than actually solving an issue.

If you put into regulation measures that ensure suppliers do not allow consumers to go without supply in reasonable circumstances, rather than increasing headcount cost and administration to a retail business that is already struggling with increased costs, the root cause of the problem identified will be tackled.

Opening 24hrs a day merely pushes the problem offshore and increases the administration of an already overloaded system.

We appreciate not all vulnerable consumers will be on a pre-payment meter but if the key group are the vulnerable, why not mandate an industry phone answering service that suppliers, through a simple £1 per customer levy, which is not recovered through the price cap, contribute to the cost of running a service where phones can be monitored and answered 24 hours a day and the consumer concerns re-prioritised when the businesses are open and be

expedited immediately. A national number, a national service that is funded by the suppliers, but manned independently (perhaps Citizens Advice). A helpful voice on the end of the phone. It could be made available only to those on means tested benefits, on PSRs, or other agreed parameters if the volume of calls required constraint.

Your proposals increase costs, which fly in the face of the last 36 months focus on reducing costs and protecting vulnerable consumers. The increased costs will be borne by all consumers which disproportionately impacts the vulnerable. Coupled with the delay or indeed the cancellation of social tariff discussions, we struggle to see how your proposals make the industry work better for those most in need.

So, the licence condition should relate to the identified concern, not simply facilitating your suggested solution for longer hours.

We have a few other concerns about 24 hour (or extended working) at our scale of business, for our staff and their safety and welfare. We would be expecting people to come to/from work when public transport is closed. Maintaining a legal attendance is likely to be affected by sickness or other absence, at which point, the entire system of the additional resource falls over.

There is probably a need to direct those most in need to where the best help can be found – Citizens Advice or Step-change for debt counselling and DWP for benefits. If consumers have a real problem with their energy bill, they are likely to have debt problems elsewhere; your proposal to add cost and reimburse it through the price cap is still asking the poorest to pay more. An energy supplier's customer service dept should be for all consumers of that company. This level of specialisation isn't, and shouldn't be, the preserve of Suppliers Customer Service dept.

Also, how do you expect to attract new entrants into the market when they have to staff up for 24 hours service from customer #1.

If you want to discuss anything contained above or in the answers to the questions, please get in contact and we will be happy to discuss our own circumstances in detail.

#### Appendix 4 - Questions

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

***Why is access the priority, surely ensuring the vulnerable are kept on supply and debt management is the objective, you can mandate no one is taken off supply at evening and weekends.***

***Forcing the manning of phones, you will force the issue offshore.***

***In addition, as a small supplier, our call waiting time in office hours is 15 seconds, we do not have people waiting to talk to us for hours, so we would question why we are being tarred with the same brush as suppliers with queues. We would ask if the stats we deliver to you being taken account of, or are assumptions being made about all players in the market?***

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.

***How exactly do we identify vulnerable consumers who won't engage and is there a difference acknowledged between can't pay and won't pay.***

***You are in danger of classifying the entire population as vulnerable. To put this in perspective we currently have a Russian oligarch customer who is in thousands of pounds of debt but cannot reasonably be described as vulnerable – he can't pay because our government has frozen his bank account.***

***We have submitted RFI responses that evidence our engagement by phone email and letter with consumers in vulnerable situations, dealing with the requirement for payment plans and offering a social tariff.***

Question 3: Do you have any comment or questions on our proposed licence changes to better support customers struggling with their bills?

***The costs will add to consumers bills. Levy £1 per household on supplier's and use the resultant £25 million fund to introduce a national hotline available to recipients of means tested benefits.***

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?

***Managing customer service by league tables is a very blunt instrument. It also opens the issue of suppliers focussing on the league table instead of the consumer and workable solutions. As an example, a supplier might have the worst customer service position but have made the most contributions to debt laden customers.***

***Citizens Advice do not rank suppliers where they cannot sample enough of their customers, as such small suppliers won't get fair representation in any league table. What is preventing Ofgem from publishing the stats we already send them around call waiting times etc.***

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

***At our scale, the employee safety issues of manning the phones out of hours, means we would have to provide a disproportionate resource to cover for sickness and absenteeism.***

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

***You are going to force us to take on 5 new members of staff which is additional cost with no immediate payback. Recruitment is currently a difficult and lengthy process.***

Douglas Stewart

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