

037 Fuel Bank Foundation

Sent: Wednesday, August 23, 2023 4:45 PM

To: Retail Stakeholder Team <RetailStakeholderTeam@ofgem.gov.uk>

Subject: Consumer Standards - Statutory consultation. Response from Fuel Bank Foundation.

This is the response to Ofgem's Consumer Standards Statutory Consultation from the Fuel Bank Foundation. We are the only UK charity that provides support to people who pre-pay for their energy, and, to date, we have provided same-day crisis help to over a million people.

We have the following comments to make on the proposals:

- We support the proposal for supplier enquiry lines to be open longer and at weekends, as it is important that customers (especially those in vulnerable circumstances) are able to contact their supplier at a time that suits their needs. However, we are also mindful of the effect that this will have on suppliers' costs as the increase will have obviously be passed on to customers at a time when prices are already at an historic high. So, research should be undertaken to see when most customers would use the extended hours and only open then, rather than being open just for the sake of it.

We also think it's right that suppliers should be required to offer a range of contact methods that reflects their customers' needs and preferences, including those customers for whom English isn't their first language.

- We have long called for more effective support from suppliers for consumers struggling to afford their energy. Suppliers should be actively encouraging their customers to disclose any financial difficulties to them as early as possible. And, when they do, they should develop bespoke, creative solutions to support them and their individual circumstances.

Suppliers should also be proactive in their use of the data they hold and reach out to customers who they believe might be struggling financially. For example, they should contact prepayment meter customers who aren't topping up as frequently as they had been previously and discuss any solutions to the problems that the customer might be experiencing.

- There is a lot of anecdotal evidence that consumers are often experiencing great difficulties in contacting their suppliers currently. Many charities are also spending too much time trying to contact suppliers on behalf of their vulnerable clients. So, these issues do need addressing urgently.

However, we think that implementing Ofgem's proposal to prioritise vulnerable customers (or their representatives) who need immediate support would be extremely challenging for suppliers. Firstly, it is not at all clear which customers this requirement would cover. We think that it would be much less complicated if Ofgem simply monitored and enforced existing Licence Conditions. In this way, suppliers would ensure that they deliver improvements in customer service that would benefit all consumers, including vulnerable ones.

- We have some concerns about the proposal to oblige suppliers to make 24/7 emergency support available for customers who are cut off from their power or gas supply due to issues

with their supplier (e.g., meter faults). We are clear that it is not Ofgem's intention that this service is for people to use if they can't afford to top up their prepayment meter. However, we're not sure that this distinction will be so clear to consumers, especially when they are in crisis. So, we'd like some comfort as to what the response is likely to be if customers call this number hoping for credit to be added to their prepayment meter, as will inevitably happen. We also think that suppliers will need to consider very carefully what training and support their advisors are given to help people who might be distressed and in crisis when they call.

The volume of calls received by this service needs to be kept under review as it could prove to be expensive to deliver during the night. So, it may be that little value is delivered at an increased cost to suppliers and, hence, customers.

- We have said in previous consultation responses that we're not convinced that compelling suppliers to make information available on customer service performance to help inform consumer choice when switching will drive improvements in service. However, the proposal certainly can't do any harm, so we support it.

As ever, please feel free to contact me if you need any further information on any of our comments.