

POLICY CONSULTATION RESPONSE 3

To whom it may concern.

I am a homeowner on a council-licensed residential park home in north-west England, where I have lived for the past 19 years. I am writing in response to Ofgem's call for responses to their consultation on non-domestic energy market.

I have almost two decades of experience as a domestic energy user who is supplied with LPG gas for heating and mains electric via the owner of my park home site. The below comments and suggestions are borne of the many problems I have had with my site owner re-selling energy to me. I really hope someone finally listens to those in my position and tightens regulations in this sector as the problems are so multiple and the intimidation suffered for trying to stand up to unscrupulous site owners so great that I am now trying to sell my beloved home as I can't take it any more. While I realise not all park home site owners are the same, sadly there are too many who take advantage of the current lack of regulation to at best ignore residents and worst exploit and bully them. These responses relate to consultation questions 9, 12, 15, and 18.

There are currently limited regulations applied to resellers such as park home site owned. They are not obliged to search for a competitive deal, address energy complaints from residents, or even provide clear bills breaking down charges as other domestic customers receive.

Site owners can charge whatever they like for LPG as it's completely unregulated.

My site owner used to send me a monthly bill in areas but it only listed the units used and total charges; no breakdown of costs. I asked for evidence of the bills and an explanation of charges to be provided more than a dozen times but received no reply so I still do not know what I am being charged and I have no recourse beyond lengthy and expensive court action, which I cannot afford.

Last year my site owner subcontracted a company to digitally read my sub-meters and provide my bills. As part of this change, I no longer receive a month or bill at all - I am instead expected to go online to see a live statement of usage and charges. But I do not have the internet at home so I have not seen my energy usage or received a bill since last summer yet I am still regularly told I must pay (I can't even check the amount is correct) and am threatened with disconnection if I do not. So I pay, despite not knowing whether I'm being charged correctly as I cannot risk being disconnected (he'll do it too - he has with others).

My site owner doesn't follow the disconnection rules - my neighbour is currently in dispute with him and is going to a tribunal over what she is being charged. As she believes she is being overcharged she has paid her bill each month minus the assumed overcharge. Despite this the site owner sent her a letter on [REDACTED] this year saying she was being disconnected the next working day if she didn't pay up in full. With her complaint to the site owner ignored and a tribunal taking 6-8 months, she had no other recourse but to pay as she didn't want to risk being disconnected.

When the site owner pays their bill late they can pass on any late payment fines to residents even if residents paid on time.

There's no effective complaints process for residents to complain about any aspect of the energy they're supplied by re-sellers like park home site owners - complaints are currently outside the remit of ofgem, or the council who licenses residential park home sites. A tribunal is the only route but it's lengthy and costly and site owners can disconnect you before the case is ruled on so people end up paying even when they believe they shouldn't have.

I think ofgem should have a role in managing if complaints if site owners do not act given their expertise in this area already for residential customers and given that many residents on park home sites are afraid of challenging their site owner. Our site owner has convictions [REDACTED] so residents are reluctant to pursue any complaints out of fear of reprisals. I also believe having regulations from Ofgem on managing energy complaints would in itself improve site owners' practice because they would know there could be action taken if they fail to manage complaints; at the moment there is little recourse for residents as there's no framework in place to support them. Some site owners know this so too often just ignore energy complaints. But any new system must have teeth and be able to punish site owners - these are often wealthy people so a small fine won't be sufficient to make them tow the line.

Residents already pay a pitch fee in the hundreds of pounds each month to the site owner. This includes contributions towards costs of running the site, which should include any complaints handling so I don't think implementing regulation on this would incur any additional costs for site owners.

Changes are also needed to the maximum resale price direction I think - at present ofgem guidance for resellers (2005) says resellers of energy must provide evidence of charges and an explanation of these to residents who purchase mains gas/electric from them if asked. Sadly not all site owners do this yet there is no redress beyond lengthy and expensive court action for residents if this happens. Residents can get a reduction on the price they pay of twice the Barclays base rate from the date the information was first requested. However the only way to get this reduction currently is by taking the site owner to the small claims court for a refund. This is a protracted process and often not worth it for the relatively small sums reclaimed (even at present with interest rates at some of their highest for 20 years, it would take months of being refused this information to be worthwhile going to court to be refunded). It would be far better if this was a more immediate financial penalty that residents could take if site owners refuse to provide the information required. For example, if they could stop paying a reasonable portion (say 10-20%) of their bill until the information is provided, perhaps with the percentage increasing for every 3-4 months it continues not to be provided. This would provide an immediate and noticeable incentive for site owners to provide the information they are legally required to pass on and would prevent residents feeling powerless in the face of site owners who at present often just ignore their requests.

Park home owners are domestic customers but they get very few of the same protections as other domestic energy customers and few rewards in exchange. While there are no doubt many good park home site owners who are fair and reasonable even in the absence of formal regulation, sadly this is not the case for all site owners and they have fallen outside of regulations for long enough. The proposals in this consultation offer some light at the end of a very dark tunnel for park home owners when it comes to energy. I really hope this consultation marks the start of a new era of improved safeguards for park home owners like me.

Internal Only

Thank you for taking the time to listen to my concerns and suggestions.

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Internal Only

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