

The representative body of the parks industry including park homes, caravans, chalets, tents, glamping and all types of self-catering accommodation.

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BH&HPA response to non-domestic market review: Findings and policy consultation

The British Holiday & Home Parks Association ("BH&HPA") is the UK national trade body representing owners and managers of caravan holiday, residential and chalet park and campsites for tents. This consultation response uses the collective term "park businesses" for our members, whatever form(s) of accommodation they provide.

Across England, our members own and manage 1,565 holiday and touring parks which provide approximately 253,614 holiday pitches. Holiday caravan owners are in effect domestic consumers of energy, despite being on non-domestic energy contracts, as energy is purchased and resold through the park business.

The residential park homes' sector accounts for around 85,000 units of residential accommodation (around 150,000 residents) in England on 2,000 residential home parks¹. BH&HPA members own and manage over 46,000 pitches for residential park homes in England. BH&HPA is one of the largest representative bodies for non-domestic energy customers, who then provide for energy for domestic consumers (park homes), within the United Kingdom. Many BH&HPA members have been subject to unacceptable service from energy suppliers. This should be of particular concern to Ofgem and Government, due to the obligation of park businesses to provide energy for domestic consumption.

Q1. Do you agree with our proposal to agree voluntary improved pricing transparency and if so, please include comments on the particular areas you would like to see made more transparent?

1. BH&HPA endorses mandatory improved pricing transparency obligations from energy suppliers when regularly billing non-domestic customers. Many BH&HPA members have expressed frustration and confusion upon receiving invoices from their energy supplier, where bills are absent of crucial information, such as relevant changes to standing charges, Government energy support schemes, wholesale purchase price, supplier profits and TPI commissions. BH&HPA heard significant concern from park businesses in April 2023, when Government support schemes transitioned from the Energy Bill Relief Scheme to the Energy Bill Discount Scheme. Many non-domestic customers were uninformed of critical information regarding price changes.

¹ House of Commons Library, ['Mobile \(park\) homes research briefing'](#), 1 December 2022

2. BH&HPA would strongly encourage Ofgem to examine regulations surrounding billing and pricing transparency, and the obligation of Energy Suppliers to improve communication with non-domestic customers. Requiring energy suppliers to invoice non-domestic customers with a full breakdown of costs would undoubtedly help park businesses understand the components of their bill. Obtaining this information is not only beneficial to the business but to end-user consumers who are domestic, such as homeowners on residential parks and holiday caravan owners, who often express their concern with high energy prices to park owner or operator.
3. BH&HPA members have reported instances where energy suppliers have not applied the Government's energy support schemes to non-domestic contracts. Greater transparency through detailed invoices would alleviate this issue. BH&HPA are of the firm opinion that greater transparency from suppliers is a necessity for non-domestic customers, including park businesses.

Q2. Do you agree with our proposed definition of 'significantly exceeds'? Please provide your reasons.

4. The Association broadly agrees with Ofgem's proposed definition of 'significantly exceeds'. BH&HPA members have suggested that using an equivalent fixed contract by which to judge, as Ofgem suggests, is likely to indicate when suppliers are applying unduly onerous deemed rates to non-domestic consumers.
5. BH&HPA would encourage Ofgem to extend its application of 'significantly exceeds' to all rates offered by suppliers, including fixed contracts and 'out of contract' rates. Many holiday and residential parks are located in rural locations, often limited by which contracts and suppliers they can obtain. BH&HPA have been made aware of suppliers charging 'unduly onerous' rates to non-domestic consumers which would also significantly exceed respective equivalent contracts. This causes significant detriment to our members and to their end-user consumers, who are domestic users.
6. BH&HPA members have further suggested that a second metric may be useful, such as a percentage change since the last period alongside this. BH&HPA supports Ofgem retaining the ability to make assessments on a case-by-case basis as they see fit.

Q3. Do you agree with our proposal that suppliers should review deemed contract rates quarterly? Please provide your reasons.

7. BH&HPA would support Ofgem's recommendation, that pricing for deemed contract rates should be reviewed quarterly. In alignment with Ofgem's proposals, it is reasonable that quarterly reviews ensure that deemed rates are reflective of energy prices whilst allowing customers to have sufficient certainty for business planning.

Q4. Are there any potential implications for domestic customers that the proposed guidance on deemed contract rates may impact on?

8. BH&HPA is aware of instances where members have been pressured, by energy suppliers, to agree to very long fixed term contracts in haste or face significantly higher 'out of contract' or deemed rates. BH&HPA would suggest to Ofgem that such practices by suppliers could be considered poor conduct, due to the responsibility of park businesses to obtain reasonably affordable energy for domestic consumers. Energy suppliers pressuring park businesses to hastily sign unfavourable fixed rate contracts is highly concerning from the Association's perspective.

9. One such example, brought to BH&HPA's attention, is as follows:

"We had a fixed term contract which was due to expire in April 2023. I was contacted by our supplier on the 30th of January and told by email 'it is time to arrange your new fixed term contract', the email went on to say that if we didn't sign up then we would automatically be switched to the Flexible Business Rate at an absorbent rate." (BH&HPA member, 2023).

The response the member received from their supplier is included below:

"The flexible plan, that is due to start on the 1st April 23 if nothing is in place, is 231p/day standing charge and 80.940p/kwh day and night. Capacity and excess capacity are exactly the same." (Response from energy supplier, 2023).

The member shared their concerns with BH&HPA, as follows:

I believe the tactics used by [REDACTED] (I can only comment on them as they are our supplier) of 'sign now or pay a lot more', were very underhand and if not illegal, definitely immoral as they knew that at the time we couldn't get a contract with anyone else. (BH&HPA member, 2023).

10. BH&HPA would remind Ofgem that 'out of contract' or 'flexible plans', presented to non-domestic customers, may often be considered unduly onerous whilst falling outside the scope of Ofgem's proposed guidance on deemed rates. Despite a welcome focus on minimising unduly onerous deemed rates, BH&HPA members are concerned by expensive 'out of contract' rates from suppliers. Subsequently, energy suppliers are free to leverage non-domestic customers into expensive fixed rate contracts, often at a premium, due to a perceived higher risk of the hospitality sector.
11. A lack of consistent terminology and open dialogue from energy suppliers, for example, using terms such as 'flexible plan', leaves park businesses unsure of whether 'deemed' or 'out of contract' rates are being applied between fixed contracts. Understanding which rate is being applied is crucial for domestic and non-domestic consumers if Ofgem proposals are carried forward. BH&HPA would encourage Ofgem to regulate the usage of consistent terms and definitions across the energy market, so that park businesses are informed of what rate will be applied to their energy consumption in between fixed rate contracts.

"[...] there are too many acronyms and terms used within the energy industry that assume we business customers are energy specialists - most of us are people who are just as confused about the energy supply to their own homes and yet that is so much clearer than dealing with a business account. [...] It truly feels when dealing with the energy companies that it is a black hole of confusion and we are reliant on our supplier being honest, helpful and upfront and willing to try and support their customers as much as possible. Unfortunately, our experience has been very much to the contrary." (BH&HPA member, 2023).

12. Many BH&HPA members have commented that due to the perceived higher risk of the hospitality sector, some park businesses in rural locations have struggled to obtain energy contracts from suppliers. One such example related to a touring park in North Wales, unable to receive a competitive energy contract due to their DNO miscategorising the business as a consumer of over 100 kVA (00 category). Unduly onerous deemed rates that would be applied to park businesses with few options for suppliers, could significantly hinder the business operations of holiday and residential parks. This is because electricity charges must be passed onto domestic consumers

under the Maximum Resale Price regulation. BH&HPA would encourage Ofgem to recommend regulation that prohibits unduly onerous deemed rates, but also limits suppliers from applying expensive premiums, for all rates, onto the hospitality sector. Such recommendations would also positively impact domestic consumers.

Q5. Do you have any further comments on our proposals for the deemed contract guidance?

13. BH&HPA notes that Ofgem's proposed guidance for deemed contracts would not have significant influence over price setting by energy suppliers, as stated by Ofgem in Appendix 1:

This guidance is not a substitute for any regulation or law and should not be taken as legal advice. [...] We do not set pricing methodologies or hedging strategies for non-domestic deemed rates. While deemed rates should not be unduly onerous, each supplier will have their own hedging and pricing strategies. (Ofgem non-domestic market review: Findings and policy consultation, 2023:82)

14. BH&HPA considers the proposed guidance as a positive step, however, would encourage Ofgem to recommend broader legislative changes to reviewing pricing methodologies. There is particular concern regarding risk premiums applied to park businesses, who are predominantly reselling energy to domestic consumers.

Q6. Do you have any other comments on the other proposals in this Pricing and contract behaviour section?

15. Ofgem states that it cannot intervene in commercial contracts, however, has expressed that it has pressed energy suppliers to review the unduly onerous fixed rates offered to non-domestic customers, when prices were at their highest. Across the Association's broad membership of businesses, ranging from microbusinesses to large enterprises, no such instances of reviewing fixed rate contracts have been brought forward. BH&HPA strongly believes that Ofgem should recommend to Government; mandatory reviews of fixed rate contracts signed between autumn and winter of 2022.
16. BH&HPA acknowledges that energy suppliers purchase much of the energy for a fixed rate contract needed for the duration of that contract, at the time it was signed, meaning that contract reflects the wholesale circumstances of when the contract was agreed. However, there is clear and legitimate concern from the holiday and residential park industry, regarding the unduly onerous fixed rate prices offered. Ofgem acknowledges that suppliers have 'acted cautiously', failing to lower fixed rate prices across the hospitality sector.

"A reduction in price was not being reported by sectors like hospitality that are viewed as higher risk. Representative groups in the hospitality sector reported that those companies willing to quote for supply are still applying high risk premiums to the prices offered to their sector" (Ofgem non-domestic market review: Findings and policy consultation, 2023:23).

17. Such higher risk premiums are particularly burdensome for the holiday and residential park industry, due to the obligation of Ofgem's Maximum Resale Price regulations to pass on the price of energy to domestic consumers: homeowners and holiday caravan owners. Significantly higher premiums on utility costs for 'higher risk' customers, not only causes significant harm to the domestic tourism sector but also directly impacts many residential park homeowners, often on fixed incomes and of higher vulnerability. Residential mobile home parks offer low-cost housing which is particularly attractive to vulnerable groups, including the elderly and some people with physical disabilities.

18. Mandatory reviews of commercial contracts, signed when prices were highest, would signify support for non-domestic customers, such as park businesses, who provide invaluable contributions to local economies, many in rural locations. BH&HPA would suggest that Ofgem's claim that it has '*seen some evidence that suppliers have acted on the pressure from government and Ofgem*', has not been evident within the holiday and residential parks industry. A mandatory obligation to review commercial contracts, by Government, would facilitate good practice from energy suppliers who still consider the hospitality sector as 'high risk'.
19. VAT Notice 701/19 authorises that a reduced rate of VAT is applied to fuel and power, when re-sold for domestic consumption. VAT Notice 701/19 signifies that HMRC and Government have considered the role of park businesses as re-sellers of electricity to domestic consumers. BH&HPA would encourage Ofgem to broaden the domestic protections to encompass those applicable for the reduced rate of VAT under VAT Notice 701/19. Introducing such protections for non-domestic resellers of energy, to domestic consumers, would align Ofgem regulation with HMRC legislation surrounding fuel and power providers.
20. Ofgem's proposal for relevant classes of customers when pricing deemed rates would be welcomed by the Association. BH&HPA would argue that park businesses, or more broadly, resellers of electricity to domestic consumers, should be categorised to receive more favourable pricing from energy suppliers. BH&HPA would strongly advise Ofgem to expand the 'relevant classing of customers' beyond deemed rates, applying differentiated pricing across all contracts to park businesses in the future.
21. Ofgem recognises the necessity for increased support for non-domestic customers, noting that: "*This range [of non-domestic consumers behind domestic contracts] adds complexity to developing potential policy measures to increase consumer protection*". BH&HPA would be happy to work with Ofgem and DHLUC to support holiday and residential park businesses.

Q7. Which documents, or combination of documents do you believe would provide a robust evidence base to demonstrate a genuine Change of Tenancy / Change of Occupier?

22. No comment.

Q8. Are Micro Business Consumers aware they can contact Citizens Advice for support? Do we need to introduce a rule requiring suppliers to signpost them more specifically?

23. As a matter of general principle, the Association supports measures to better signpost microbusinesses to advice and support, such as that provided by Citizens Advice. Members have suggested that any such signposting would need to be clear and not buried within other sections of a customer's bill or correspondence, which may lead to it being lost amongst this other information.
24. BH&HPA would be well placed to share any guidance produced with the microbusinesses within our membership by way of the Association's journal and regular email communication to members.

Q9. Is an obligation requiring efficient and timely complaints handling needed? If so what are the costs and benefits associated with introducing this?

25. An overarching theme, present in feedback from park businesses across BH&HPA membership, is the necessity for obligatory, efficient and timely complaints handling. BH&HPA has been notified of instances regarding highly concerning customer complaints handling from energy suppliers.

*“Every time we called our supplier, we would wait two hours and then the line terminated. All we received from our emails were automated responses.”
(BH&HPA member, 2023).*

26. If Ofgem were to introduce regulation regarding efficient and timely complaints handling, this would facilitate greater accountability and transparency of the energy supply sector, protecting and supporting non-domestic energy customers who provide invaluable contributions to local, often rural economies. Ofgem acknowledges that suppliers have ‘acted cautiously’, failing to lower fixed rate prices across the hospitality sector. Subsequent poor complaints handling, alongside opaque communications and premium pricing has culminated in unacceptable service levels from energy suppliers to many BH&HPA members.
27. The benefits of strengthened complaint handling regulation would ensure that energy suppliers uphold their responsibilities as a provider of essential services, whilst being held accountable for when the service they provide is unsatisfactory. BH&HPA would argue that the current absence of accessibility from many suppliers compounds the need for obligatory efficient and timely complaints handling regulation. Considering the responsibilities of park businesses to provide adequate energy supply for domestic consumers, efficient and timely responses from suppliers are crucial for this subset of non-domestic customers.
28. The costs associated with introducing efficient and timely complaints handling regulation should fall upon the energy suppliers. BH&HPA is of the firm opinion that efficient and timely complaints handling should be obligatory, due to the importance of providing an adequate energy supply to homeowners and holiday caravan owners.

Q10. Is an obligation requiring recording, handling and processing of complaints in accordance with consistent rules needed? If so, what are the costs and benefits associated with introducing this?

29. In relation to Question 9, BH&HPA has been notified of instances regarding troubling customer complaints recording, handling and processing from energy suppliers. As previously highlighted, many BH&HPA members have expressed their frustration in receiving a lack of comprehensive communications from their energy supplier. An obligation that requires recording, handling and processing of complaints in accordance with consistent rules would facilitate better practice within the industry, encouraging suppliers to work with non-domestic customers to resolve issues.
30. BH&HPA would welcome more specialised complaints handling from suppliers within their respective customer bases. It would be reassuring to non-domestic customers, particularly those who resell electricity to domestic consumers, if new Ofgem regulation for complaints handling and recording highlighted the wide array of non-domestic consumers, whilst encouraging suppliers to tailor support for the requirements of different sectors. BH&HPA notes that some suppliers do not differentiate complaints handling for vastly differing enterprise scales, ultimately leading to generalised or scripted responses to unique issues and concerns.

31. BH&HPA are aware of a few occasions on which park businesses have only received clear and direct responses, after long periods of time, from senior members of staff as opposed to customer complaints services. One such example related to the application of the EBDS scheme and whether the residential park was eligible. Obligatory Ofgem regulation for complaints handling and recording would improve this experience for non-domestic consumers. Park businesses should not consider generalised customer complaints services as an intermediary step to receiving support, but as an effective means of resolving complaints and obtaining relevant information. BH&HPA would support Ofgem to bring forward obligatory requiring recording, handling and processing of complaints in accordance with consistent rules.
32. The costs associated with introducing regulation for recording, handling and processing complaints should fall upon the energy suppliers. BH&HPA is of the firm opinion that recording, handling and processing complaints should be obligatory, due to the importance of providing an adequate energy supply to homeowners and holiday caravan owners.

Q11. Do you have any views on what (if any) threshold should apply on business size for complaints handling requirements, or views on which requirements set out in the Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008 should not be expanded to apply to all non-domestic customers?

33. BH&HPA would encourage Ofgem to consider applying all applicable provisions of the Gas and Electricity (Consumer Complaints Handling Standards) Regulations to all non-domestic customers, and in particular to park businesses. It is a logical step to include park businesses within the scope of increased Consumer Complaints Handling Standards, considering these businesses predominantly act as an intermediary seller of energy to domestic consumers. Widening the scope of Consumer Complaints Handling Standards to park businesses would be a tangible step in supporting domestic customers behind non-domestic contracts.
34. The Association comprises of a range of business enterprises, ranging from micro-businesses to large enterprises. Predominantly, BH&HPA membership comprises of small to medium enterprises which are often family owned. It would be entirely reasonable to suggest that a business owner should receive the same protections under the Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008 for their business, as they would receive if making a complaint regarding a domestic contract. Provisions regarding the recording, handling and processing complaints upon receipt are crucial for supporting non-domestic consumers in periods of economic uncertainty. BH&HPA would encourage Ofgem to expand all applicable provisions within Gas and Electricity (Consumer Complaints Handling Standards) Regulations to park businesses.

Q12. We are seeking stakeholder views on our suggested proposals to government around increasing access to the Energy Ombudsman. Should there be a threshold on who can access the Energy Ombudsman? If so, where should this be set?

35. BH&HPA agree with Ofgem that, at present, limited routes for resolution dispute exist for SMEs who don't have the resources for expensive legal action. Whilst it is understandable that setting an objective limit on those applicable to the Energy Ombudsman will be challenging, BH&HPA would support Ofgem's intention to expand access to the alternative dispute resolution service. Some small to medium sized park businesses have experienced highly concerning service from energy suppliers, in which, a dispute resolution service such as the Energy Ombudsman would be critical in supporting park businesses in challenging circumstances.

"We feel that [REDACTED] are conducting their business in a totally mercenary fashion and are purely out to serve their own agenda of maximising and protecting their profits whilst their customers suffer. We feel they have treated us very poorly by the lack of communication at a time of crisis. They were uncontactable for 6 weeks." (BH&HPA member).

36. Ofgem acknowledges its concern that some customers face greater detriment because in many instances it is unfeasible for businesses to seek legal intervention. BH&HPA agrees with this statement and support Ofgem's proposal to increase access to the Energy Ombudsman, to support park businesses in effectively resolving complaints with their supplier in a timely and appropriate manner. On the basis that SMEs are least likely to utilise legal intervention, it would seem logical that the threshold should include SMEs. BH&HPA would support Ofgem's proposal to amend schedule 2 of the Gas and Electricity Regulated Providers (Redress Scheme) Order 2008 to include SMEs, particularly those reselling electricity to domestic consumers such as park businesses.
37. Ofgem could propose that the same parameters that define small to medium enterprises are included within the Gas and Electricity Regulated Providers (Redress Scheme) Order. If Ofgem were constrained by the Government to limit access from all SMEs, due to the additional financial cost, BH&HPA would argue that resellers of electricity, such as park businesses, must be included within the scope of the proposals. By doing so, Ofgem would simultaneously be providing greater support to domestic consumers behind non-domestic contracts.

Q13. We are seeking stakeholder views on the proposed changes to the rules requiring suppliers work with Third Party Intermediaries who are members of a redress scheme. Additionally, what are your views on the costs and benefits associated with the different proposals?

38. BH&HPA would encourage Ofgem to continue to support Qualifying Dispute Settlement Scheme (QDSS) redress. Option 3 within the consultation proposal for TPI redress schemes is an acceptable proposal to support SMEs within the BH&HPA:

"Option 3 - Expand the requirement for suppliers to only work with TPIs that are signed up to a QDSS to a limited section of the non-domestic retail energy market. (Ofgem non-domestic market review: Findings and policy consultation, 2023:52)

39. Option 3 allows for park businesses, whose supplier works with a TPI, to receive greater support and access to a redress scheme. The costs associated with introducing efficient and timely complaints handling regulation would fall upon the energy suppliers and TPIs.

Q14. What are views from stakeholders on how long it would take to set up and register for a wider TPI ADR scheme, one that goes beyond Micro Business Consumers?

40. No comment.

Q15. What are your views on our proposal to expand SLC 0A (non-domestic Standards of Conduct)? Do you have any views on which consumers they should or should not apply to? Please provide any views on costs and benefits of making this change.

41. BH&HPA would support the expansion of SLC 0A (non-domestic Standards of Conduct) to businesses larger than micro-businesses. Opinions from park businesses across

BH&HPA membership consistently refer to poor communication from suppliers. This was of relevance in April 2023, where the Government's EBRS support transitioned to the EBDS. Many BH&HPA members were left uninformed of critical information regarding price changes. Difficulties contacting energy suppliers was commonly cited as a major concern by BH&HPA members. The obligation of suppliers, under the SLC 0A (non-domestic Standards of Conduct), would oblige suppliers to '*make it easy for Micro Business Consumers to contact the supplier and act promptly to put things right when the supplier makes a mistake*'. Therefore, an expansion of the SLC 0A (non-domestic Standards of Conduct) to include larger businesses would undoubtedly support the parks industry.

Q16. Do you have any further comments on the proposals in this section on Competition in the market and customer complaints?

42. BH&HPA have been made aware of concerning and below satisfactory customer service and complaints handling by energy suppliers for park businesses. Some examples of such have been highlighted in the questions above. BH&HPA are of the firm opinion that positive steps to improve complaints handling by energy suppliers will only benefit the energy market for all non-domestic consumers.

Q17. What are the views of Distribution Network Operators (DNOs), Independent Distribution Network Operators (IDNOs), Gas Distribution Networks (GDNs), and Independent Gas Transporters (IGTs) on the potential issues of targeting support to vulnerable end users supplied through non-domestic contracts?

43. N / A

Q18. What changes to the Maximum Resale Price direction would improve its effectiveness and what are the potential downsides to any changes?

44. The Association promotes good practice within the industry, vetting members prior to application and informing members of important regulations that must be upheld, such as, Ofgem's Maximum Resale Price regulation.
45. BH&HPA would remind Ofgem that the greatest concern for park businesses, and subsequently domestic consumers utilising said businesses, is the cost at which electricity is purchased from energy suppliers. As previously highlighted, an array of factors has resulted in domestic consumers behind non-domestic contracts facing unprecedented energy prices. BH&HPA is of the firm opinion that changes to the Maximum Resale Price would not offer greater protections for domestic consumers on member parks. Rather, BH&HPA would encourage Ofgem and Government to examine means of mitigating the cost at which energy is being purchased by park businesses.
46. It is understood that the intention of the Maximum Resale Price is to supply electricity at a cost neutral basis. However, many BH&HPA members have cited that since the Maximum Resale Price came into effect, it has led to a financial loss for the business, due to meter reading and administration costs not being considered as a part of the Maximum Resale Price regulation. Further enforcement mechanisms to ensure park businesses adhere to the regulation will only negatively impact residential parks, a sector which provides low-cost, single-story accommodation suitable for an aging population.

Q19. What are the costs and benefits associated with the proposal to expand TPI commissions disclosures to all non-domestic customers? How long would it take suppliers to implement this policy?

47. No comment.

Q20. Are there views on how commissions disclosure is best presented to be understood by consumers?

48. The Association received the following feedback from a residential park owning member:

*"It would seem most natural that if this is to be disclosed, it needs to be shown in a reasonably clear and unambiguous manner. It would seem logical to include this as a line on the invoice. We would presume that the commission is based on an addition to the unit rate which can be set out as a descriptor along the lines of "TPI commission @ x.xx pence per kwh is included within the unit rate stated above."
(BH&HPA member, 2023)*

49. BH&HPA echoes feedback from members that greater transparency would undoubtedly support park businesses and other non-domestic customers.

Q21. Should we expand commissions disclosure to all non-domestic customers or a subset of customers, and if a sub-set do you have views on how to define this?

50. BH&HPA would support the expansion of commissions disclosure to all non-domestic customers, and in particular to park business whose end-use consumers are domestic. As a matter of general principle, the Association would always encourage billing information to be presented in as clear, simple and the most unambiguous manner possible. The more informed a customer is, the greater agency they are able to exercise within the market.

51. Members have suggested that this could be included as a line within a customer's invoice, based on the presumption that that the commission it is based on is a percentage of the unit rate. This information can be set out as a descriptor along the lines of "TPI commission at p/kWh is included within the unit rate stated above."

Q22. Do you have any further comments on the proposals in this section on focussed consumer support?

52. Data provided by Government on uptake of the EBSS-AF², highlights that 40,980 park homeowners received the £400 payment. Only 16,260 received the AFP-AF. Considering that the *Mobile (park) homes research briefing* estimated that there are 150,000 park homeowners as of 2022, this uptake percentage should be highly concerning to Government and Ofgem. Many residential park homeowners are often on fixed incomes and of higher vulnerability. Considering that many homeowners on residential parks did not receive the EBSS-AF, the only Government support available to domestic consumers behind non-domestic contracts, it is evident that many homeowners on residential parks have do not have the same protections as domestic consumers would receive - such as the Energy Price Guarantee.

² Department for Energy Security and Net Zero, [‘Energy Bills Support Scheme Alternative Fund \(GB / NI\) and Alternative Fuel Payment Alternative Fund: applications made by customers’](#), 11 May 2023

53. Many BH&HPA members would be supportive of individual homeowners on residential parks receiving direct supplies of electricity from suppliers. However, adopting the infrastructure to accommodate private electricity supply is not only prohibitively expensive, but is likely against the interest of energy suppliers. BH&HPA members have reported that energy suppliers appear to prefer dealing with one non-domestic customer at a higher rate than individual homeowners on residential parks.
54. BH&HPA strongly argues that energy suppliers should consider park businesses as a differentiated class of customer which will be applicable to greater consumer support, given the absence of domestic support at present for homeowners on residential parks. BH&HPA are of the firm opinion that park businesses should receive similar domestic protections for contractual pricing and consumer support and would encourage Ofgem to recommend protections to Government.

We sincerely hope that BH&HPA's comments will be considered regarding Ofgem regulation and your subsequent proposals to Government. BH&HPA members are pleased that Ofgem recognises the urgency of these matters and has therefore proceeded at the first opportunity and with a 6-week response period. However, despite the importance of the issues discussed, the timing of the consultation over the busy summer holiday period for the parks sector, in addition to the shortened time-period for responses, may limit the number of responses from affected stakeholders. This should not lessen the weight which is attached to them.

Please contact us if we can provide additional information; further, we would be pleased to arrange a visit to a holiday or residential park, or facilitate a stakeholder forum with affected members, if this would be useful to Ofgem, ministers and their advisors.

Yours sincerely,



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