

Emailed to: FWP@Ofgem.gov.uk

9 February 2024

Ofgem's Forward Work Programme 2024/25

Thank you for the opportunity to comment on Ofgem's Forward Work Programme for 2024/25. We support the three strategic priorities to shape the retail market so that it works for consumers, enable infrastructure for net zero and establish an efficient, flexible energy system.

We agree with the importance of driving up standards to ensure that there is a market that works for consumers. We also agree with the proactive market monitoring and outcomes based approaches. We believe that both need to be supported by a range of data sets and insights in order to build a more comprehensive picture of how the market is working. We will continue to work closely with Ofgem to share our data and insight in support of their compliance and enforcement approach.

We support and welcome Ofgem's recent work on improving standards and outcomes for non-domestic consumers. We will continue to work closely with Ofgem in this area and we have also responded to the recent non-domestic market review consultation. We will also continue to share our data and insight with Ofgem from the energy broker Alternative Dispute Resolution scheme, and work with both Ofgem and the Department for Energy Security and Net Zero (DESNZ), as DESNZ considers energy broker regulation.

We will continue to work with Ofgem as it looks at developing a proportionate regulatory framework in the Heat Network sector to ensure protections are in line with the rest of the energy sector. We are keen to support Ofgem and would be happy to share any insight we have from working with those heat networks which are members of Heat Trust.

Finally, we support Ofgem's aims around consumer participation in the market. Protecting the interests of both consumers and non-domestic consumers as new products and services emerge will be key to building trust and confidence and reaching net zero. We think it's right to encourage innovation and consumer engagement (particularly in hard to reach sectors) while also protecting consumers who do not or cannot engage. We also think it's right to review the risks, benefits and implications of using Artificial Intelligence in the energy sector. As the market evolves with new products, services and technologies, it will be crucial to use data and insight from stakeholders to identify gaps in consumer protection and also ensure that consumers have clear access to advice when they need support and redress if things go wrong.

Please do not hesitate to contact us should you wish to discuss our response in more detail. Our response is not confidential.

For more information regarding this response please contact:

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