

Douglas White  
Director of Policy and Advocacy  
Consumer Scotland  
153 London Road  
Edinburgh  
EH8 7AU

Dear Jonathan Brearley,

**Consumer Scotland's response to Ofgem's consultation on the Draft Forward Work Programme 2024/25.**

Thank you for the opportunity to respond to Ofgem's consultation on the Draft Forward Work Programme (FWP) 2024/25. I have set out in this letter Consumer Scotland's feedback on the draft FWP, which I will hope will be of value to you as you finalise your activities for the coming year.

Consumer Scotland has valued our engagement with Ofgem during the past year. In particular, we have been pleased to work with your teams in relation to:

- The Code of Practice on Involuntary PPM, the development of a Consumer Standards Framework and the review of standing charges
- Working towards a single, multi-sector Priority Services Register
- The regulation of heat networks
- Influencing the development of Ofgem policy through events, workshops, the Consumer Groups and Charities Call and the Energy Consumers Network in Scotland.

We look forward to continuing and building upon this positive relationship during 2024-25.

Consumer Scotland recently published our own Draft Work Programme for 2024-25. In this Programme we set out our planned work for the year across our three strategic objectives:

- Cost of living and affordability
- Consumers in vulnerable circumstances
- Climate change adaptation and mitigation

Our proposed workstreams include research, analysis, policy and advocacy activity, alongside our work on the Consumer Duty for public bodies in Scotland, the system for recall of goods and the development of our investigations function. We receive levy funding for our work in the gas, electricity, post and water sectors and we also undertake work across the wider consumer economy.

Given that set of activities, and reviewing Ofgem's Draft FWP, there are a number of areas where there are opportunities for Consumer Scotland and Ofgem to work together over the next year. In particular, we would be keen to engage closely with your teams on proposed work in the following areas:

- **Shaping a retail market that works for consumers** – Consumer Scotland supported Ofgem in its work to strengthen protection for consumers in the retail market in 2023-2024 and we welcome Ofgem's ongoing commitment to this. In 2024-25 we will continue to provide evidence and insight on the key issues for consumers in Scotland to support our shared priorities, such as:
  - fair pricing
  - heat networks regulation
  - consumer participation in the future energy market
  - protecting vulnerable consumers, including Ofgem's review of the Consumer Vulnerability Strategy 2019-25
- **Enabling infrastructure to net zero** – Alongside our ongoing work on regulated energy networks in 2024-25, our Draft Work Programme sets out a high level vision of work that Consumer Scotland proposes to undertake, to support the transformation of the energy system in Great Britain in ways which maximise the benefits of the transition to consumers in Scotland. Ofgem's work to reform local energy institutions and governance, and the role of the Future Systems Operator in the development of Regional Energy Strategic Plans, are likely to be considerations as we look to progress this work.
- **Energy efficiency and social schemes** – Schemes including the Energy Company Obligation and the Warm Home Discount are a key part of the support landscape for consumers in vulnerable circumstances, and those experiencing affordability challenges. Consumer Scotland will continue to advocate for improvements in the design and administration of schemes to deliver better outcomes for consumers in Scotland.

I hope these comments are helpful and we look forward to continuing to work with Ofgem during 2024-25.

Yours sincerely,

Douglas White  
Director of Policy and Advocacy  
Consumer Scotland  
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