

RNIB's response to Ofgem's review into standing charges on energy bills

January 2024

Q13: How can we identify the complex needs of vulnerable customers and ensure that they are able to receive tariffs that benefit them the most?

RNIB response:

We recommend that energy suppliers should be required to offer tariffs without standing charges, either in their current form or removed from unit rates, for those most struggling with energy bills, including people with sight loss.

Rapid rises in the cost of living have had a disproportionate impact on blind and partially sighted people. RNIB's Helpline has seen an increase in the volume of calls and enquiries that are energy related as people struggle with high costs across many aspects of their spending, including food, rents or mortgages, and transport. This has continued to spike alarmingly during December 2023, and we anticipate will continue in 2024.

Life costs more if you are blind or partially sighted. These costs include additional, unavoidable costs like taxi journeys, assistive technology and support in the home. Five years ago, these extra costs averaged between £50 and £135 a week. It is estimated that the everyday living costs of a pensioner with a severe sight impairment is a staggering 73 per cent higher than for someone of the same age without sight loss [1].

People with sight loss are also twice as likely to live in a household that has a total income of £1,500 a month or less [2].

In the first year of the cost of living crisis alone, more than a third of survey respondents told RNIB [3]:

- They “often” have to choose between essentials such as food and heating, or have struggled to make ends meet.
- Despite many blind and partially sighted people requiring additional levels of lighting to safely move around their home and for other tasks, more than two thirds also reported using less energy to try and save money. This compares to a third of the general population.

Blind and partially sighted people also told RNIB:

- “I have lots of gadgets... which help me remain independent, but they all need regular charging.”
- “I’m partially sighted and turning off lights puts me in danger of tripping.”
- “I have a condition called night blindness which means that I can't see very well, at all, pretty much next to nothing in low levels of light. So I need quite a lot of light to be able to see. Dotted around my home I’ve got a lot of task lights. I've got lights under my cupboard in the kitchen so when I'm preparing meals it helps shine a light on what I'm doing. If I didn't have those lights in and around my home it would really impact on my residual vision and I would be pretty much totally blind without the lights. At the moment, I'm so worried about the rising energy bills, but I've been trying to switch lights off where I can, but then that's resulted in me tripping over things in and around the home that I haven't seen and potentially cutting myself when I'm prepping food.”
- "I am severely sight impaired and work full-time part of the time at home. I need lots of light to work to enable me to see along with numerous accessible electronic technology products such as iPad, iPhones, smart speakers, electronic magnifiers, document readers, and more. I am finding that I am trying to work without the aid of light, which is causing me significant difficulties not just with trying to do my work but is affecting my posture and mental health due to frustration. I am also concerned about tripping and falling due to low or no light levels and we have not even gotten to the winter months or more darkness. I am not traveling outside independently anymore due to the additional costs of taxis in order to save money on energy bills.”

Disability benefits are available to people with sight loss to help with the extra costs associated with disability. However, RNIB’s research in 2015 found that 28 per cent of blind and partially sighted people said that the disability benefits they received were rarely or never enough to meet the extra costs incurred as a result of their sight loss [4].

There is growing evidence that this has been compounded by the cost of living crisis.

Some 50 per cent of blind and partially sighted people in a survey of more than 400 blind and partially sighted people in April 2023 reported

using their disability benefits to cover bills rather than the additional costs of their disability.

One person with sight loss, for instance, told RNIB:

“Now I have, like most sight impaired people, a lot of assistive technology and one of mine is breaking down now. I'm absolutely lost without this technology. I can't do what I want to do without it, but can I afford to get it replaced? No, I can't because the Personal Independence Payment that I would have used to get it replaced is now being used to pay my bills.”

In November 2023, over a fifth (22 per cent) of blind and partially sighted people reported having cut back on replacing or buying assistive technology because of the cost of living crisis, which are vital to their every days lives – such as screen readers, braille displays, and speech recognition software [5].

It is vital a lower energy rate without a standing charge is made available for those most struggling with energy bills, including people with sight loss.

We think that eligibility should be automatic and based on key benefits like disability benefits such as Personal Independence Payment. Individuals should not have to navigate complex application processes.

The energy Priority Services Register (PSR) is also an important route to be made aware of money saving tariffs. However, only two in five blind and partially sighted people are on the PRS due to a lack of awareness about the purpose and benefits of the PSR and misconceptions about eligibility. For people not on it, simply knowing it existed is a significant issue. For others eligibility can be confusing or difficult to prove.

We think action should also be taken by energy providers and the Government to raise awareness of the benefits of the Priority Services Register (PSR) with customers, clarify eligibility myths and make the process of signing up easier. It is important that blind and partially sighted customers are aware of the option to be registered on the supplier's PSR. It is also important that anyone on the PSR who moves supplier has their name ported over to the new supplier's PSR.

It would be useful for energy providers to be able to share specifically how many of their customers have sight loss (additional markers through the PRS register) to help monitor progress and registration.

In addition, many people with sight loss find it harder to compare the prices of energy bills due to the inaccessibility of some energy and price comparison websites. One individual with sight loss shared with RNIB:

- “I am blind and cannot shop around for better energy deals online, as many of the websites which offer deals are not accessible using screen reading software.”

For blind and partially sighted people to access money saving tariffs, the websites and apps of all energy providers and price comparison websites must be tested for accessibility and usability to ensure they work for blind and partially sighted people, including those using assistive technology like screen readers and magnification software. The Web Content Accessibility Guidelines (WCAG) are an internationally recognised set of recommendations for improving web accessibility. All websites must achieve WCAG 2.1 level AA as a minimum.

Blind and partially sighted people are twice as likely to be digitally excluded than the UK average. Our research has found customers with sight loss are more reliant on phone communications and less reliant on website information. In 2021, RNIB surveyed 400 blind and partially sighted people about their experience of the energy market. The results showed most people preferred to get in touch with energy companies by phone (64 per cent), which is higher than the general population (54 per cent as reported by Ofgem).

It is important customers can check if they are accessing the best tariff through non digital means, including phone communications.

[1] Hill, Horsley, Hirsch, Padley, 2017. Sight Loss and minimum Income standards – the additional costs of severity and age. Social Policy at Loughborough University and Thomas Pocklington Trust. Available from <https://www.pocklington-trust.org.uk/sector-resources/research-archive/sight-loss-and-minimum-income/>

[2] Slade, Edwards, 2015. My Voice 2015. RNIB. Available from <http://www.rnib.org.uk/myvoice>

[3] RNIB, 2022. Why the cost of living crisis has a bigger impact on people with sight loss. Available from <https://www.rnib.org.uk/professionals/health-social-care-education->

[professionals/knowledge-and-research-hub/reports-and-insight/cost-of-living-crisis-impact-on-sight-loss/](#)

[4] Slade, Edwards, 2015. My Voice 2015. RNIB. Available from <http://www.rnib.org.uk/myvoice>

[5] RNIB, 2023. Cost of living is hitting mental and physical wellbeing of blind and partially sighted people new research shows. Available from <https://www.rnib.org.uk/news/cost-of-living-is-hitting-mental-and-physical-wellbeing-of-blind-and-partially-sighted-people/>