

Citizens Advice Response to Ofgem's Innovation in the Energy Retail Market



Executive summary

Citizens Advice welcomes Ofgem's consultation on Innovation in the Energy Retail Market.

The consultation paints a picture of the market at present, which is delivering some innovation (predominantly in the domestic market) around the ways in which consumers are billed for their usage - and providing a means for energy flexibility - through new tariff structures.

Tariffs will continue to evolve with the introduction of the Market-wide Half Hourly Settlement (MHHS), as will the prevalence of low-carbon technologies. We're particularly keen to see innovation which helps people overcome financial and other barriers to adopting new technologies and energy efficiency measures, such as energy subscription models, subject to these offering good value and high standards of service. We also support changes that enable innovation supporting people in vulnerable circumstances more broadly.

Ofgem's consultation proposes reforms to five routes to market: restricted licences; derogations scheme; individually modified licences; Licence Lite; licence exempt supply. Out of all routes proposed, we feel that reforms targeted at increasing take up of Licence Lite are an appropriate enduring option for boosting innovation without compromising consumer protections - or the level playing field for competition - but faces some significant commercial challenges to being used more widely.

The other routes under consideration by Ofgem could be useful mechanisms to enable innovative products and services to operate at a slightly larger scale and for a limited time period. However, as enduring or widely adopted options, we think they risk undermining competition by enabling some firms to avoid a fair share of certain costs, and increasing the risk of a less inclusive market developing over time. Enabling a broader range of firms in the energy market without adequately updating regulation to address new risks was one of the factors that led to almost 30 domestic energy suppliers failing in 2021/22.¹

These options are therefore better suited as transitional arrangements ahead of wider market reforms which address these risks in a more coherent manner. Their use should be subject to careful assessment of consumer benefits and close monitoring in the first instance, with the addition of increased standards and other measures.

¹ Citizens Advice (2021) [Market Meltdown: How regulatory failures landed us with a multi-billion pound bill](#)

In general we are concerned that the proposed reforms are not radical enough to match the pace of change needed in the market. The National Energy System Operator's (NESO) Clean Power 2030 advice referred to 'transformative innovation', including in relation to tariffs and energy services to 'increase participation in smart technologies and demand side flexibility'.²

Without a clear vision from the Government and Ofgem for how the retail market can support this outcome, we're concerned that innovators will be less keen to invest and make use of the limited new routes to market. The routes to market under consideration leave significant power with Ofgem to determine how innovation proceeds, rather than ensuring the retail market more generally can act as a platform for innovation, driven by consumer choice.

Ofgem should now go further and faster, and consider the extent to which the wider supply licence (particularly the USO) may hinder innovation and design reforms around those learnings. This process will also require upfront consideration of key issues in relation to consumer protection in a more innovative and diverse market, as well as the treatment of consumers in debt and in vulnerable circumstances. A more ambitious approach is also likely to better align with Ofgem's new duty to consider the impacts of its regulation on economic growth.

All reforms should ultimately be complemented by a Consumer Duty, which we feel is the most significant enabler for innovation, and has already been shown to be effective in the much more diverse and innovative financial services market. This approach would limit the need for prescriptive rules to govern emerging products and services, while providing the regulator with a means to tackle poor practice, and consumers with confidence that firms offering innovative services will act to ensure good outcomes and that complex products will offer fair value.

It's also important that Ofgem considers energy consumer propositions as a whole, and not just those that act as 'suppliers'. Government is developing plans to regulate flexibility services and third party intermediaries (TPIs), and it's important that any changes to enable innovation align with these changes, with common consumer outcomes and safeguards targeted across these services.

Please find our detailed response to the consultation below.

² National Energy System Operator (2024) [Clean Power 2030](#)

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Q1.What innovation is currently happening in the domestic and non-domestic retail markets? What is the scale of this innovation?

The domestic market has seen some innovation which the consultation highlights. This is different in the small business market, where improvements are far less readily apparent. Irrespective of these trends, both markets would benefit from greater innovation as we head towards net zero.

As the consultation recognises, time and type of use tariffs are changing the ways in which consumers are billed for their usage and providing a means for using energy flexibly. We can expect to see more innovative tariffs emerge alongside the introduction of the Market-wide Half Hourly Settlement (MHHS).

Energy as a service (EaaS) models are intended to make low-carbon technology more accessible by spreading out the costs of such equipment, but remain niche. Current Government plans emphasise a wide range of finance models, so we expect subscriptions to become more commonplace in the sector - with an increase in suppliers adopting these models.

We have observed several innovations in the domestic market, outside of those mentioned within the consultation:

- Load limiting is a feature in some international energy markets. This technology allows providers to prevent outages and manage energy costs, by restricting supply during periods of high demand without cutting it entirely.
- Smart meter data is being used to drive improvements in the domestic market. The SMETER Innovation competition funded the development of measures that gauge the thermal performance of homes³, with insights that can inform the accurate sizing of heat pumps and other efficiency improvements. Platforms like uZero use anonymised smart meter data to support local authorities, housing associations and social care providers to create energy-saving solutions⁴. The platform's predictive model also allows for the identification of areas at high risk of fuel poverty. Other platforms operate in a similar way to SMETER, using smart meter data to advise on retrofitting priorities i.e. fitting insulation before installing a heat pump⁵.

³GOV.UK (2022) [Smart meter enabled thermal efficiency ratings \(SMETER\) technologies project: technical evaluation](#)

⁴ Urban Tide [Uzero](#) [accessed 26/11/24]

⁵ Loop [Trust Power](#) [accessed 26/11/24]

- Energy disaggregation technology, as seen in innovations like Scottish Power's Energy Insights app, is helping consumers to better understand their energy usage. Through the app, consumers can see a breakdown of energy used by specific appliances within their homes to encourage soft behavioural changes - like switching devices off as opposed to leaving them on standby. The supplier estimates that the tool can help consumers reduce energy usage by up to 5%⁶.

It is worth noting that while innovation founded upon consumer smart data has the potential to deliver numerous benefits, there are also risks if data is not used appropriately, or if consumers feel that they have lost transparency or control of how their data are used. It should be highlighted that consumers consistently - and increasingly - cite the importance of being able to opt-out of sharing their data as important to them trusting or making use of smart-data-derived products and services⁷. We also know that consumers who make the most use of data-derived services care the most about being able to make choices about their data sharing⁸.

Alongside the ability to make choices about how their data are used, consumers also expect a fair value exchange if their data are to be used. Robust opt-outs and requirements for clear consent can help with this, incentivising service-providers to offer consumers a useful benefit in exchange for access to their data - these benefits could range from the purely financial to more tailored products and services.

Industry and the regulator should avoid scenarios where consumers are not able to make these choices or exert control as doing so risks greatly diminishing trust and engagement.

We would note that Ofgem's reporting around the introduction of Market-wide Half Hourly Settlement showed that relatively few consumers have made use of the ability to opt-out⁹. This is demonstrative of the fact that there is a distinction between the reassurance provided by the knowledge that an opt-out is possible, and the propensity for consumers to actually make use of that opt-out ability. Providing opt-outs does not reduce data sharing, in fact it often increases it as consumers feel more empowered to opt-in knowing that they can retain control and choice in the future.

As mentioned, innovation appears to be happening at a slower rate in the small business market. However, we are aware of a handful of initiatives and trends.

⁶ Scottish Power [Energy Insights](#) [accessed 26/11/24]

⁷ In 2019 89% of consumers rated the ability to opt-out as important or very important, in 2024 when we asked the same question the number had [increased to 92%](#)

⁸ Citizens Advice (2024) [Get Smarter: Ensuring people benefit from Smart Meters](#)

⁹ Ofgem (2021) [MHHS Final Impact Assessment 7.9](#)

Octopus Energy has two innovative tariffs available to businesses, the first is a no standing charge tariff that is currently being trialled¹⁰. The second is a local business plan developed in two cities (namely Leicester and Brighton) in partnership local renewable sites, with the mission of providing 100% renewable energy to businesses in the two areas¹¹.

Energy consultants are becoming more popular in the small business sector. Consultants help businesses find a suitable energy tariff, whilst also offering assessment services to outline where businesses can be more efficient with their usage.

Q2.What innovation should happen to meet consumers' needs and meet net zero?

We would like to see innovation specifically targeted at people in vulnerable circumstances, as well as inclusive innovation. In our response to Ofgem's Future Regulation Sandbox consultation¹², we proposed avenues for innovation targeted at vulnerable people - such as using self-disconnection data to identify those struggling to pay their bills, which could be a useful addition to the well developed modelling and identification approaches in the fuel poverty arena. We're concerned that Ofgem did not provide a more detailed update on its plans for developing the Sandbox in this consultation.

In our recent response to Ofgem's Consumer Vulnerability Strategy Refresh¹³, we demonstrated that innovations can inadvertently exclude consumers in particular circumstances. For example, people with less predictable routines (such as households with young children, shift workers and people who are digitally excluded) may face additional barriers to engaging with and benefiting from ToU tariffs.

Specifically, we would like to see innovative products in the market which look to provide sustainable solutions to specific issues that make consumers who are vulnerable prone to higher energy costs. Prioritising this kind of innovation would ensure technological advancements are not just inclusive, but truly transformational for the most at-risk consumers. In the transition to net zero, the greatest barriers and opportunities are likely to concern the take up of low carbon technologies like heat pumps and EVs. It should be a priority to enable innovation which supports adoption by low and middle income consumers who may otherwise face significant financial barriers.

¹⁰ Octopus Energy [Businesses can now join our No Standing Charge Tariff](#) [accessed 26/11/24]

¹¹ Octopus Energy [Dreaming big and supporting small](#) [accessed 26/11/24]

¹² Citizens Advice (2024) [Response to Ofgem's call for input on a Future Regulation Sandbox](#)

¹³ Citizens Advice (2024) [Response to Ofgem's 'Refreshing our Consumer Vulnerability Strategy'](#)

Q3.What will be the impact on consumers of new, innovative products and services? How can we maximise the benefits and minimise the risk?

ToU tariffs could help reduce overall costs in the energy market. However, the primary beneficiaries are the customers who adopt these tariffs. We know that shifting usage isn't feasible for everyone: renters may lack permission to install smart meters; residents of flats may not have access to EV charging at home; those needing continuous supply for medical devices cannot adjust their usage.

Currently, many consumers rely on single-rate default tariffs - which could become more costly if flexible, lower-demand users disproportionately switch to ToU tariffs. This shift could impact consumers on lower incomes, increasing energy costs and deepening challenges for those unable to adapt their usage patterns. New and innovative services could accelerate this risk.

In our April 2024 report¹⁴, we recommended policies to mitigate the cost burden on default tariff users and ensure EV owners contribute fairly to costs. One solution could be a separate default tariff for specific high-demand assets, like EVs or heat pumps, incentivizing their flexible use and protecting vulnerable consumers from rising costs.

We agree that consumer awareness, engagement and trust are important enablers for innovation, as well as a clear, stable regulatory environment. To this end, we welcome the Government's plans to regulate the flexibility sector, in particular the proposal to expand statutory advice and advocacy to cover the flexibility sector.¹⁵ Appropriate regulation of the flexibility market, that sets standards and protects consumers, along with independent advice provision, should play an important part in unlocking these important enablers and innovation more broadly.

In addition, new terminology entering the sector, such as energy 'subscriptions', will require extensive communications around their meaning. Subscriptions are ubiquitous in modern life, tied with the perception that they can be cancelled at any time. By contrast, new solar panel or heat pump subscriptions typically can't be cancelled without some detriment to the consumer. Consumers will require transparency around contract terms and the implications of exiting agreements.

Inflexible contracts, especially those of a longer-term, put consumers at risk whose circumstances are likely to change over a contract's lifetime. A way of minimising risks to

¹⁴ Citizens Advice (2024) [Don't settle for second best: Ensuring energy market reforms stack up for people](#)

¹⁵ DESNZ (2024) [Delivering a smart and secure electricity system: implementation](#)

consumers would be through the implementation of a Consumer Duty, and we welcome Ofgem's commitment to consider this approach as part of their Consumer Confidence programme¹⁶. A Consumer Duty will increase standards across the board and is particularly important as the market becomes more diverse with more innovative services in the transition to net zero. It gives consumers confidence to engage by ensuring firms focus on good consumer outcomes and provide products which offer fair value, while also enabling innovation by avoiding the need for more prescriptive regulation.

The bundling of services, as seen in EaaS products, poses issues around consumer protections. Whilst we recognise that in the case of energy subscriptions, services like maintenance are important to ensure the longevity of products - the terms of subscriptions can run decades, and adding this service to the monthly charge means consumers could end up paying over the odds. As energy subscriptions increase in popularity, consumers will require transparency around how their money is being spent and assurances that firms are offering products that are fair value. The latter requirement is a key component of the Consumer Duty in financial services, whereas in energy regulation pricing is excluded from requirements to treat customers fairly.

Q4. Are there any additional enablers or barriers to innovation?

Consumer attitudes towards longer-term contracts will constitute a barrier to innovation. Whilst we recognise such contracts allow for the purchasing of energy efficiency improvements and technologies that might otherwise be unaffordable, our research indicates that contracts - particularly those over two years - can be offputting to consumers¹⁷.

Autonomy and flexibility are also important to consumers. Our research revealed that EaaS contracts would be unattractive to consumers if they didn't allow for change, such as changes in circumstances - or if the changed contract might lead to a higher price than normal supply¹⁸. We reiterate that a Consumer Duty could help to enhance confidence in innovative products.

¹⁶ Ofgem (2024) [Consumer confidence: a step up in standards](#)

¹⁷ Citizens Advice (2019) [Future for all: Making a future retail energy market work for everyone](#)

¹⁸ Citizens Advice (2019) [Future for all: Making a future retail energy market work for everyone](#)

A lack of representation in product trials will prevent inclusive innovation. In our response to Ofgem’s Future Regulation Sandbox¹⁹, we warned of the risk that consumers who have a higher cost to serve (such as those in vulnerable circumstances) being excluded from trials. These groups are already less likely to reap the benefits of future innovations, therefore designing trials without the appropriate representation risks creating regulatory structures that further exacerbate this.

Firms are also only likely to invest in innovative products and services if there is a clear direction of travel for the retail energy market, with sufficient assurance that innovative services which achieve good outcomes will not face regulatory barriers. We are concerned that without that market vision, Ofgem’s more limited changes proposed in this consultation will be less likely to be successful in enabling innovation.

Q5. What is the most significant barrier to innovation? Why?

We believe that the current approach to retail regulation and the absence of a Consumer Duty is the most significant barrier to innovation.

Innovation is reliant on participation, but we know that consumer confidence in the energy sector is low. Ofgem’s own monitoring shows that energy suppliers are less trusted than providers in other markets, with only one in three people trusting energy suppliers in general²⁰. Without improvements, consumers will be less likely to try new products developed by suppliers - as distrust creates space for concerns about hidden costs, unreliable services or data misuse. We have seen the latter pattern play out in our research into views on smart meters, where a lack of trust transpired as a reason for not wanting such technology²¹

A Consumer Duty will help to build trust in the market (and the innovative products that sit within it) by ensuring fair outcomes and value for consumers. By driving higher standards and being outcomes focused, it will also assure firms that there will be limited need for more prescriptive regulation for new products and services, which can inhibit innovation.

The Universal Service Obligation (USO) is also a significant barrier to a greater range of business models in the market, and limits the scope for specialisation by firms.

¹⁹ Citizens Advice (2024) [Response to Ofgem’s call for input on a Future Regulation Sandbox](#)

²⁰ Ofgem (2024) [Consumer impacts of market conditions survey: wave 5 \(January to February 2024\)](#)

²¹ Citizens Advice (2019) [Clear and in control: Energy consumers’ views on data sharing and smart devices](#)

However, this may not prevent innovation by firms which wish to operate on the broad basis it requires (see question 6 for more details).

Q6. What innovation is not happening because of regulatory barriers?

We would like to see Ofgem assess more extensively the extent to which the supply licence and broader regulatory regime delivers or hinders innovation. Many of the examples presented within the consultation either sit outside the current regulatory framework - like boiler servicing contracts - or happen irrespective of Ofgem rules, such as 100% renewable contracts.

In a previous report, we explored reforms to the Universal Service Obligation (USO) which would enable specialisation by firms²² and particularly around limiting which customers a supplier can acquire - by removing rules on customer acquisition (including the Duty to Supply), tariff design for new customers and payment methods. A step further would entail suppliers being enabled to move their customers on deemed contracts and default tariffs to a new supplier - chosen by the regulator or through a bilateral agreement - meaning suppliers could fully specialise, only serving customers whose needs they can fulfil.

We also explored how the USO could prevent suppliers from serving customers who have not deliberately chosen to use their services. Under this reform, default customers would move to a designated USO provider who could deliver more support for consumers - including those in debt or arrears. This move might seem radical, but consumers are already automatically moved to a new supplier if their current supplier fails.

Reforms to the USO would carry risks that need to be managed - for instance, the absence of the current USO could see wider use of credit checks and security deposits, meaning consumers with financial difficulties may face challenges.

Ofgem would need to closely monitor impacts to consumer groups should more radical change come about, and perhaps need to designate one or more suppliers as a backstop universal provider. In the latter instance, the regulator should consider setting higher standards for the default product and its services than it already does to account for a loss of competitive pressure.

The regulator would also need to consider the impact of reforms to the USO on other policy areas. For example, if some suppliers are able to bypass the USO and target

²² Citizens Advice (2023) [Ripping off the band aids](#)

lowest cost-to-serve customers, the price cap may need to increase for those suppliers acquiring higher cost-to-serve customers. Policies to levelise certain costs may be needed to ensure that all consumers pay a fair share.

Q7. Should we do further work to improve routes to market?

We are not entirely confident that proposed reforms to routes to market are substantial enough to match the pace of change within the market.

We appreciate that Ofgem is focusing on changes that can be made quickly. However, with ambitious targets set around smart metering, net zero etc. - we feel the regulator and Government could benefit from being more radical in its approach to change.

Much of what is being proposed has been consulted on previously²³. In addition, much of what the regulator is attempting to achieve through reforms to routes to market could be enacted more coherently through reform of the USO and the wider supply licence.

The proposed changes could be implemented in the interim before more radical reforms happen. However, we would advise Ofgem to consider to what extent enduring innovation can be brought about through temporary measures.

We emphasise the need for cohesive and comprehensive reform. In previous calls for input²⁴, we have warned against a past approach to piecemeal reforms which led to a market that delivered some innovation but also proved fragile to shocks and provided poor quality services for many consumers. We would encourage Ofgem to deploy a cohesive reform strategy, complimented by a Consumer Duty.

Q8: Which routes to market are most attractive and why?

Out of all proposals mentioned in the consultation, we feel that Licence Lite is the best enduring route for boosting innovation without compromising consumer protections.

As the consultation recognises, take up of Licence Lite is low due to difficulties faced when sourcing a Third-Party Licensed Supplier (TPLS) and the risks associated with failures. If

²³ Ofgem (2020) [Supporting retail innovation: Policy consultation on ability to provide derogations from certain standard licence conditions; and, granting supply licences for specific geographic areas or premises types](#)

²⁴ Citizens Advice (2023) [Towards a more innovative energy retail market: call for evidence](#)

the appropriate steps are taken to address these barriers as proposed, Licence Lite could make entry more feasible for new or small suppliers by reducing set up costs and regulatory burdens associated with full supply licences. The model could also allow for innovative suppliers to introduce niche or specialised products, without the full compliance costs associated with a standard supply licence. However, we recognise that reforms to Licence Lite could be time consuming and may result in no meaningful increase in uptake. Ofgem should ensure there is sufficient appetite from innovative firms before taking this step.

We are tentatively supportive of reforms to restricted supply licences. This model could also provide a route for suppliers to specialise in specific services or consumer needs - such as local, low-carbon generation - by tailoring licence requirements to the scope of the supplier's services. However, given the risks of restricted licences undermining the level playing field for competition we think their use is best suited as part of a transitional step towards a more innovative approach across the market.

We are keen to understand more about how restricted licences will work in practice, given the flexibility required in definitions of 'premises'. The current scope of these may inadvertently exclude non-traditional or mixed-use buildings from this kind of licensing arrangement, therefore we would encourage Ofgem to ensure definitions capture a wide range of dwellings.

In all cases, we stress the need for rigorous consumer protections to protect consumers from service limitations or failures. This is particularly important in the case of restricted licences designed to vulnerable groups (such as those living in social housing) which may require additional regulatory oversight to ensure access to protections.

Q9: If you think that we need to improve routes to market, which option do you think should be our top priority and why?

As mentioned, we believe that Ofgem should prioritise Licence Lite out of all options proposed.

Q10: What are your views on the options presented for amending routes to market? What would be the risks and benefits of each option?

As mentioned, we believe that Licence Lite is a suitable enduring route for boosting innovation whilst maintaining consumer protections. The consultation recognises that new entrants have concerns around the scheme, and Ofgem proposes to address potential drawbacks through reforms. We feel that the regulator could go further in considering requirements on suppliers to offer this scheme to new entrants, which would also increase take up.

We are less confident in the potential of restricted supply licences to boost innovation, but we would support changes to ensure this route is impactful. We reiterate that restricted supply licences designed to serve vulnerable groups would likely require additional protections.

We recognise that the derogations regime could support trials of innovative products and services on a larger scale than is possible through Ofgem's sandbox, which we would support subject to the appropriate protections. However, we do not feel the regime can serve as a primary route to market. There is little incentive on the part of suppliers to invest in innovations permitted under temporary derogations, as this permission could be revoked. We have also previously expressed concerns around the extensive use of derogations²⁵, which could lead to market inconsistencies and undermine competition.

We recognise that some services may not work with some of the requirements of SLC 27. Derogations in this space must be balanced against the risk of weakening of protections for consumers experiencing financial vulnerability. There should also be measures like levelisation to ensure that some suppliers and their customers don't unfairly avoid the costs of providing certain services in a way that could undermine competition.

In relation to derogations from SLC 22.3, while this may enable firms to limit who they sell products to, they would still be required to serve any customer who moves into a property under a deemed tariff, continue to serve customers who build up debt, and meet the needs of consumers whose circumstances change after the point of sale - even after the initial contract has ended. These rules may continue to act as a significant barrier to specialisation which can only be addressed by looking at the USO more comprehensively.

²⁵ Citizens Advice (2023) [Towards a more innovative energy retail market: call for evidence](#)

We are less supportive of individually modified licences due to regulatory complexity. This route could lead to inconsistencies in consumer protections, as consumers would be subject to differing standards. This variability in standards also has the potential to compromise consumer confidence. In relation to derogations and individually modified licences, it is vital that there is clear and easily accessible information on what rules a firm is required to follow, for consumers to understand the products they're buying and to enable advice organisations to support them if things go wrong.

We have strong reservations about licence-exempt supply models given their lack of regulatory oversight. In a previous call to input²⁶, we drew on the negative experiences faced by consumers in non-licenced arrangements, such as those offered by landlords via sub-meters - where consumers faced high costs, inadequate service and limited recourse for problems. Expanding this route to market would pose significant risks to consumer welfare, particularly for those on lower incomes or in other vulnerable situations. We do not feel that monitoring, as the consultation proposes as means of protecting consumers, would be sufficient enough to ensure standards are maintained.

We are, however, supportive of Ofgem's commitment to review the Maximum Resale Price (MRP). For consumers with limited options or bargaining power (such as those in sub-metered properties) the MRP is a crucial means of protection from excessive charges. We suggest that any review of the MRP is focused on identifying gaps or weaknesses in the current system that would allow for excessive markups, particularly those that impact consumers of lower incomes or in vulnerable situations, and leave protection gaps around emerging types of energy services where these may not meet the needs of the end user.

Q11: To facilitate innovation, which supply licence conditions would most benefit from being reformed (e.g. adding derogation powers)?

Ahead of energy subscriptions becoming ubiquitous in the market, we would support provisions that protect consumers from being locked into unsuitable long-term contracts. As mentioned, bundled services and long-term contracts are likely to become more common within the sector as consumers move towards low-carbon solutions. Rules ensuring that consumers have transparency on costs associated with contract termination or equipment removal prior to beginning a subscription would need to be implemented.

²⁶ Citizens Advice (2023) [Towards a more innovative energy retail market: call for evidence](#)

As we strive for a more innovative market, a Consumer Duty would eliminate the need for the regulator to act reactively to protection gaps arising from new services - such as those stemming from energy subscription models. It would also allow for some existing prescription to be removed, as protections would be enshrined through the Duty as opposed to the supply licence. In this way, the Duty could reduce regulatory complexity while making the system more resilient to future improvements - ensuring innovation and protections can grow in tandem.

We see the role of the regulator as balancing out rules, so that consumers on traditional energy services (particularly those on default contracts) maintain tighter regulation - while newer services outcomes can be driven by consumer choice, subject to high-quality information and upgraded protections under a Consumer Duty. The latter would ensure that firms support good consumer outcomes, without stifling innovation.

Q12: Are there any other improvements to routes to market which should be considered as part of enabling significant innovation in the retail market?

Not answered.

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Published November 2024.

Citizens Advice is an operating name of The National Association of Citizens Advice Bureaux.

Registered charity number 279057.