

Q1 – Yes, we support this work. I would ask why support through the scheme for Scotland seems disproportionate, being capped at £600k (2.11).

We would also note that supplier schemes have very limited criteria and are not available with each and every supplier. These schemes often have unclear or onerous application processes and suppliers are not forthcoming about advertising or processing applications to these. Fuel Direct takes months to set up and suppliers push from pillar to post advising customers to contact DWP directly for this, with the DWP pushing them back to the supplier etc. Communication and adequate training for any scheme introduced will be extremely important.

We would stress that money advice charities don't always receive funding for energy projects and advice. Yet, they often end up providing this advice anyway due to clients having energy debt(s), within a debt case for example. Their advisers still have to speak with energy suppliers, review client debt options and ensure energy efficiency advice/support in place to help with minimising arrears as part of the case strategy.

Q2 – Yes, we believe it is necessary for helping some to move past the longstanding impacts of the pandemic and restore hope that household bills will once again be achievable.

Q3 – We do agree with all principles, however, struggle to identify that the scheme could represent fairness & consistency due to the eligibility criteria proposals (some, not all) and delivery methods proposed which exclude those struggling that are not in receipt of benefits or with vulnerabilities in the household.

Q4 – Yes, and we are encouraged that it is noted that this should reduce differences between SC and DD rates in the price cap.

Q5 – Marketing and promotion so that everyone is ready and prepared for application. Had our organisation not been a member of AdviceUK, we may not have seen this consultation advertised elsewhere and calls for input. We subscribe to many advice sector organisations but didn't notice this to be fed through in any other channels and so we do feel more could be done to reach out to the sector as well as the public who impacted by this and whose views you hope to incorporate into decision making.

On the other hand, we do have concern that in light of this being publicly advertised and discussed, there could be phishing and scam opportunities and the customers that we represent have cognitive impairments which poses higher risk to our service users than others.

Q6 – Not necessarily, the energy crisis is still impacting people presently so it would depend on when the scheme would open/close and how much effort had been put in to engaging with customers.

Q7 – We feel that with debt matching, customers could be pressured whereby they can't actually afford it to make these payments and risk consequences or costs to not paying other priority debts or buying essentials.

Q8 – Delivery option 2 so that the party is impartial. Suppliers would be privy to past history of account, previous engagement levels (2.11 – 'do not engage', are not able to engage; customer service levels contribute to engagement level of a customer) and customers may not speak with them based on prior negative experiences which could influence advisers. If the responsibility and processing remains with each supplier, we also feel this could discourage some clients from applying or speaking with them, could increase hold times even further for general

contacts with the supplier (and customers not able to wait for lengthy periods so other customers service could be negatively impacted due to the introduction of a scheme). This option would place less pressure on suppliers and CGCs as already huge demand on services and having to add in additional work and there is little notice to prepare for this if looking at summer 2025 (especially for CGCs where recruitment is difficult).

Engagement is discussed as a factor in considering those eligible for help. We believe this could pose a risk that our service users, as well as many vulnerable others and those with disabilities, could then be missed or left out. Engagement for our service users can be difficult due to communication issues and their disability having an impact on speaking, manual dexterity to type or write, focus to make calls (and likely be placed on hold), remembering their passwords or account details etc. In the event they have a carer, this could place an onus on the carer or the customer may feel pressured to divulge personal information to a non-trusted party in relation to this, leaving them exposed to risk(s).

Engagement may also start off well but due to the impact of HD on mental health, stability, memory and the degenerative nature of the illness, it will likely get worse or harder for the customer as time passes. This would be a concern across the board for those with other health problems that could be impacted in a similar manner. Customers could lose capacity throughout the application process. We would be concerned that HD is already a very misunderstood disease and that supplier advisers are not trained on this illness specifically to recognise the significant communication difficulties it can cause, and how best to identify and address these.

Being aware of the demands placed on charities, and the waiting times that advice agencies have presently due to staffing shortages, ill health etc. we don't know how successful this would be without appointing a team specifically to task or providing funding to support this.

Q9 – No preference. As little involvement from CGCs as possible, but do believe there is a place for them to be involved to encourage customer engagement and maximise potential outcomes of the scheme. Practice for previous energy assistance applications used is usually to certify that information is available for audit when applying and would be good to follow similar route with random selection of cases to be checked post-award from the scheme.

Q10 – We think there will always be a need for external agencies to be brought in to assist and make this scheme more attractive and accessible for the targeted audience and participants to use.

Q11 – Look at what works/has worked best already with other applications or schemes that have seen a large uptake.

Q12 – As a CGC we would just like to be kept informed with as much notice as possible and clear understanding of what the process will be. This includes suppliers being fully aware of the process and training front line staff. It is often found that when calling suppliers, advisers don't know details of their own suppliers debt relief schemes/Trusts, eligibility criteria for those, and/or how to access, despite their longstanding existence.

We find it encouraging to see that even if customers have left a supplier they can still qualify for support and not be penalised for their choices in exploring the energy market, as is identified by Ofgem as something to aim for following introduction of such a scheme.

We would query how Ofgem would be assessing whether there is a disability in the household. We don't feel relying solely on WHD and PSR data would display true figures, some clients don't qualify for PSR as no refrigerated medication, kids in household etc and not everyone on disability benefits is also on a means-tested benefit to qualify for WHD as disability benefits are often not means-tested.

We would want to establish whether 'WHD recipients' refers to those that have already successfully received support from WHD applications in previous years. A lot of clients do not uncover this entitlement or forget to apply. Cut-off dates can also be easily missed as several suppliers only open applications for 1 week and don't advertise this well. The WHD Broader Group is also a manual application, therefore not everyone submits them. Where there are degenerative disorders, it is increasingly difficult to rely on memory about this each year and a lot of pressure already on carers/guardians/POA etc. WHD applicants representing only 11% of all customers in debt and arrears is a low amount and not proportionate to assist the majority of those experiencing energy debt.

In experience, people often become SC customers as they are unable to commit to DD payments due to affordability or poor experience with supplier of having active DD (price increases being automatically instructed and vulnerable clients not understanding this when agreeing to set up as told of fixed monthly DDs). So it is disappointing to see assumptions that such a low proportion of their customers on SC are struggling with their bills/will receive support as I do believe they are in need.

Our advisers have worked with many energy customers who say 'as soon as this is paid/resolved I will be moving supplier' and are unable to due to high levels of debt already accrued. We are encouraged that this could create a freedom for those customers to switch suppliers, including accessing incentives to do so which can maximise household income i.e. cashback rewards, new customer incentives, new and modernised tariffs that have become available, peak save suppliers etc. This will also hopefully improve financial capabilities and re-motivate clients to feeling they are in control of their energy bills again.

Q13 – Very limited expected impact on bills and believe this doesn't deter from benefits to be gained if accurate. Highly possible for other crises to occur in the next 5 years though, and therefore look to be of further detriment to clients if this did happen.

Q14 – Feel it should be ruled out that it is possible for suppliers to do this through application/audit process as would be entirely unfair.

Q15 – If the clients are suffering further due to the energy crisis, we believe this should be apportioned within the new scheme.

Q16 – We would find this not to be the best way to distribute funds as we have experience of helping energy customers whereby they would not be able to commit to payment toward their arrears and, if they did, it would be at an extremely low level. This could incentivise customers to prioritise energy debts over mortgage and council tax arrears which have further reaching impacts of non-payment through public debt recovery routes and associated charges. If debt matching is included, we don't think it should be the only way to qualify for assistance.

Q17 – We would find this hard to quantify and feel a lot of customers will struggle to pay anything other than their ongoing usage and trying to budget for annual costs (paying more in summer to account for winter fuel costs, as is standard to encourage). If debt matching is the

chosen method, we feel that people able to make even token payments toward the debt level should be awarded perhaps a standard minimum amount from the scheme to support and encourage them to start repayments.

Q18 – We don't think funds should be paid in advance of them being gained but it would depend on the delays this could cause to the scheme.

Q19 – While 5 yrs is ideal for resulting in little impact to customers, I do believe this period is too long and that anything could happen between now and then.

Q20 – We believe re: arm 1 – a percentage of debt would be fairer than setting a minimum debt level. The level of debt often doesn't correlate with the mental health impacts on a customer who has perhaps never been in debt before. Following the pandemic we are seeing more people experiencing financial difficulties, that did not prior to the pandemic. Re: arm 2, we believe the period should go back to the first increase in the price cap as this was the biggest shock and impact from the pandemic.

Q21 – We feel that debt matching puts pressure on the client to come up with these funds as it is incentivised, and they may then take out debt to cover essentials elsewhere. They didn't have this money before, and so not likely to have it just because this scheme has become available. This could also replicate schemes that suppliers already operate.

We wouldn't find CRA reporting reliable enough and to be kept up-to-date once accounts become historical/inactive.

We would also find it hard to support that the scheme should only be directed at those who already qualify for some support. Using WHD criteria could mean others not eligible that are already struggling are excluded from yet another offer of assistance and we believe it could further deter those customers from paying to their arrears/debt.

We believe council tax banding should not be a factor as people are often forced into the high cost rental market due to homelessness and the housing crisis as well as relationship breakdowns perhaps leaving a single party in a home with a high council tax banding and so this does not correlate with someone's ability to afford their bills.

We believe the debt should be written off, whether this be a proportion of the account only or full balances owing. We would support affordability assessments being completed by CGCs or suppliers instructing third party organisations to complete these to a high standard bearing in mind jurisdictional differences and incorporating SFS and CFS guidance and trigger figures to ensure consistency in application of figures or such similar tool as may be deemed relevant and appropriate.

Q22 – We don't feel that the level of indebtedness should have weight on whether someone gets any assistance or not as they will be verifying that they struggled during the qualifying period as set in arm 2. We would support arm 2 dating back to original intro of price capping.

Q23 - Income/affordability assessments by supplier appointing trusted third parties and in line with SFS and CFS guidance to check affordability of a payment plan at the same time as considering write-off. Perhaps applying that if it would take longer than 12m to repay debt at what rate is affordable then they qualify for assistance from the scheme as write-off or partial write-off. One example could be that there are arrears of £1200 and the client can only afford to

pay £20p/m to the arrears. The scheme could then write off the difference of (£1200-£240 (pd by customer at £20p/m)) = £960.

Q24 – Yes, we agree that these should be considered in the scope of the scheme as these accounts could still be having huge detrimental impacts on customers through CRA reports etc. It will be a challenge to trace customers who could have moved address and not been back in touch and so we believe steps should be outlined to suppliers as to what they have to do before resigning that they are unable to reach the customer and as long as those steps or criteria have been met, it is deemed they have done all that they can.

Q25 – We would not support removal of this as we don't agree that support should only be given to those who qualify for WHD etc which is looking like the likely method.

Q26 – If opting for repayment plans following the affordability assessment (if this method is chosen) Ofgem could stipulate that this is a condition and that someone agrees to pay in accordance with this. However, we don't feel it is fair to revoke any offer of assistance or write-off at a later date if they are unable to keep up with this, and it would be too onerous to go back and review this with customers in the months following application. Customers' circumstances could change again and customers shouldn't be punished for this.

Q27 – For a charity like ourselves it may be hard to identify who we can assist as it is likely to be only a small number of our clients due to the geographical limitations of our service, and health characteristics being so specific. Other CGCs likely to also be impacted by this difficulty and recording and reporting varies across the sector.