



Ofgem: Consumer Outcomes and Supplier Guaranteed Standards of Performance

Response from Scope

January 2026

Scope welcomes the opportunity to respond to these calls for input. Ofgem launched these consultations to gather views on developed Consumer Outcomes¹ and how the supplier Guaranteed Standards of Performance² should be improved to better protect consumers.

Key points:

- On average disabled households need an additional £1,095 a month to have the same standard of living as non disabled households.
- Scope supports Ofgem in implementing new Consumer Outcomes. We urge the regulator to fully embed accessibility and protection standards and strengthen accountability and enforcement.
- Scope supports Ofgem reviewing the supplier Guaranteed Standards of Performance. We urge the regulator to introduce meaningful compensation, tighten, and clarify exemptions, and improve monitoring and compliance.
- In 2025, half of the disabled consumers applying to Scope's Disability Energy Support service that were in energy debt, had monthly debts of £1,000 or more.
- In this consultation, Ofgem must be mindful of its obligations under the Public Sector Equality Duty and its explicit statutory duty to account for the interests of disabled people.

1. About Scope:

We're Scope, the disability equality charity. We won't stop until we achieve a society where all disabled people enjoy equality and fairness, at home, at school, at work and in our communities.

We're a strong community of disabled and non disabled people. We provide practical and emotional information and support when it's needed most. We use our collective power to change attitudes and end injustice.

2. Context: Extra Costs

Scope welcomes Ofgem's introduction of the new Consumer Outcomes and the review into the supplier Guaranteed Standards of Performance.

Life costs more if you are disabled. On average disabled households need an additional £1,095 a month to have the same standard of living as non disabled households.³ This figure is expected to rise to £1,224 a month by 2029/30.⁴ These current costs and predicted rise account for benefits such as Personal Independence Payment (PIP). These benefits are a lifeline for disabled people, many of whom are in low income households or facing financial insecurity.

Unaffordable household bills are one of the biggest issues that disabled people face. The increasing cost of energy bills since the energy crisis hit, the average 26% increase in annual water bills for 2025 to 2026, and spiralling personal debt combine to worsen the situation for disabled people.⁵

Scope offers free energy and water advice to disabled people through our Disability Energy Support (DES) service. We know from this service that many disabled people need to use more heating because they cannot regulate their body temperature.⁶ Some need to charge equipment like electric wheelchairs. Others need life saving equipment like ventilators or dialysis machines. These costs cannot be avoided and result in many disabled people struggling to heat their homes and falling into debt.

Data from Scope's DES service shows that in 2025, 50% of consumers in energy debt had a monthly average debt of £1,000 or more. Disabled consumers coming to Scope have an annual average of £2,270 of energy debt; this figure was £1,056 in 2022.

In 2025 alone, almost a quarter of Scope's DES consumers relied on medical equipment. Of those consumers, 82% struggled to keep their essential equipment powered. This means that these consumers already pay more for their energy or risk their health and safety. It is these consumers who would be disproportionately negatively impacted by any increase in bills, no matter how small.

While there is a heavy focus on energy costs over winter, many disabled people have higher costs throughout the year. This can be for a variety of reasons, including needing to consistently power medical equipment.



A recent survey from Scope's Lived Experience Research Panel highlights how heatwaves affect many disabled people not just physically, but financially.⁷ The survey conducted in June 2025 found that 29% of respondents worried about hot weather, compared to only 27% worrying about the cold. 41% worried about both.

68% of respondents reported limiting their use of fans and other cooling equipment due to costs. 44% saw their water bills rise in summer compared to spring, and 25% saw an increase in energy bills.

3. Consultation question responses

Consumer Outcomes questions.

Q1. In your view, what are the key factors we should consider if we are updating our regulatory framework for retail energy suppliers, keeping in mind the balance between our growth and net zero goals, and consumer interest duties?

A key factor must be adequate accountability for suppliers, including meaningful rights of recourse for consumers when things go wrong. This accountability should include supplier obligations that are clear, including using words like “must” instead of “should” to clarify the standards that all suppliers should be held to.

Ofgem must ensure that accessibility and flexibility are built into the regulatory framework to support disabled consumers, including the use of British Sign Language, easy read, and large print at a minimum. It is vital that these consumers are not expected to move to inaccessible tariffs, products, or schemes such as Net Zero, which are more likely to negatively impact disabled consumers.⁸

Ofgem must prioritise improving and standardising accessibility across suppliers and must hold suppliers to account through meaningful sanctions and consequences for repeated failures.

Q2. Why do you think there is such a divergence of satisfaction rates across different consumer cohorts?

There is a clear divergence of satisfaction rates amongst disabled consumers, in almost every reported category.⁹ This suggests that there is a systemic failure in addressing the concerns and needs of disabled consumers. Guidance around accessibility must be specific and clear about supplier obligations. Making these changes and ensuring genuine recourse for consumers will be a key factor in improving consumer satisfaction rates.

Where suppliers cannot meet the standardised accessibility requirements, Ofgem and consumers must be informed. This is vital, so that consumers with accessibility needs can switch to an inclusive supplier who can better support them. By being proactive in protecting

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and supporting disabled consumers, suppliers and Ofgem may see a reduction in consumer complaints and improved satisfaction rates.

Similarly, Ofgem should use the development of the Consumer Outcomes framework to encourage suppliers to train staff in disability awareness, accessibility, and better utilisation of the Priority Services Register (PSR).

These steps could assist in developing stronger public commitments, improved standards and increased competition amongst energy suppliers.

Q3. The Consumer Outcomes have been developed based on what industry, charities, consumer groups and consumers have told us they need to cover. Do you agree that these outcomes cover the most important expectations consumers have of energy suppliers?

Yes. These outcomes must include specific and explicit reference to supplier obligations to disabled consumers. This includes ensuring wording reflects obligations.

There should be a requirement for suppliers to help disabled consumers move to a new supplier. This is vital where the current supplier cannot meet the consumer's accessibility needs. This support should not be reliant on past consumer engagement, as inaccessible communication may have been the blocker to consumer engagement.

Disabled households are more than twice as likely to be in fuel poverty than non disabled households.¹⁰ Less than half of the disabled households in fuel poverty receive disability benefits, demonstrating a severe gap in support.¹¹ To prevent widening the gap, Ofgem should encourage suppliers to adopt inclusive practices and promote use of the PSR as a non medicalised method of support.

Q5. Do you agree with the explanations provided of the Consumer Outcomes in the appendices of this call for input? Do they help you understand the intent of the outcomes?

The description of outcome 9 is weakened by the caveat "where possible". The phrasing undermines the aim of inclusive design and inclusivity should be the minimum standard for all energy suppliers. Genuine exceptions must be clearly justified to Ofgem and consumers,

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and in these circumstances, consumers must have the right to change supplier.

The explanation for outcome 23 should explicitly reference the PSR, especially as 63% of eligible consumers are unaware of it.¹² As the regulator, Ofgem should require suppliers to provide clear, standardised information and signposting to the PSR. All customer facing staff should be able to identify a consumer's PSR eligibility. As things stand, suppliers are not required to identify or support consumers who could benefit from this support. This leads to inconsistent use of the register and varying support for consumers in vulnerable circumstances.

Q6. Why do you think these outcomes are not materialising consistently for all consumer groups given that they are in line with our existing rules?

A key factor is that disabled consumers are all wrongly assumed vulnerable, and yet the Supply Licence Guidance and Electricity Supply Standard Licence features no requirements around accessible communication unless a consumer is on the PSR.¹³ As the majority of consumers are unaware of the PSR, there must be a mandatory supplier commitment to meeting the needs of disabled consumers and all consumers with accessibility needs.

The current approach risks suppliers breaching their obligations under the Equality Act 2010.¹⁴ Ofgem must ensure that suppliers embed inclusive practice and reasonable adjustments into all interactions with consumers, regardless of their PSR status.

Q7. Do you think some outcomes are more important for consumers than others?

With the cost of living and energy costs remaining higher than pre pandemic levels, robust consumer protection is more important than ever.

Outcome 1 which calls for proactive support and realistic payment plans is essential not only for consumers in debt, but for those trying to avoid it. There should be specific and clear guidance on what this support involves otherwise suppliers will offer inconsistent support, and this will risk pushing more consumers into debt.

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Clearer standards are needed for outcomes 4 and 5, and minimum expectations must be well defined. This is essential in protecting and supporting consumers in switching energy supplier, as not everyone will know how to access comparison websites, and their supplier may provide different support to others.

Competition is key within the energy market, and this could be strengthened by creating meaningful minimum standards to support consumers. These standards would protect the public while allowing suppliers to be innovative and exceed the minimum standards, improving consumer outcomes across the energy market.

Q9. Do you have a preferred approach among those outlined below or should we retain the current framework? Do you have an alternative suggestion? Please explain your reasoning.

Including the Consumer Outcomes directly in the supply licence would offer the best protection for consumers and ensure that suppliers face appropriate consequences when they fail to meet standards. However, removing all existing rules would only create gaps and weaken regulatory protection.

It is too risky to rely solely on reputational incentives as a way of addressing supplier failures. These incentives should still support the licence requirements; Ofgem can use both licence requirement compliance and reputational incentives to measure supplier performance. This could help encourage competition from a consumer outcome perspective.

Q10. Do you think a voluntary approach – where suppliers make a public commitment to deliver the Consumer Outcomes without formal regulatory change could be effective? What conditions would need to be in place for this to work?

A voluntary approach would not be effective. This would expose disabled consumers to inconsistent and weaker standards of performance and protections. As previously acknowledged, there is already a gap in support and variation across suppliers.

If a voluntary system were implemented, several conditions would need to be in place. These would include:

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- Mandatory public supplier commitments detailing how Consumer Outcomes will be delivered.
- Clear implementation plans outlining the proposed changes and benefits to consumers.
- Routine reporting and transparency including published performance data so that consumers can compare companies.
- Consistent monitoring from Ofgem to hold suppliers to account.
- Robust impact assessments to identify consumer groups that may require deeper support.

These conditions would help safeguard against the risks posed by a voluntary design, though it remains Scope's preference that Consumer Outcomes sit within the supply licence.

Tied to this, prescriptive rules must remain in place for accessible practices and equal access to services. Additionally, the minimum standards should be increased to reflect genuine protection for disabled consumers.

Q14. What factors should we consider to determine whether specific rules are best delivered through prescription, principles or outcomes?

Where the rule relates to accessibility and the protection of consumers in vulnerable circumstances, they must be prescriptive. Flexibility in these areas create inconsistencies and poor consumer support.

Rules for best practice above the minimum standard can be delivered through specific principles or outcomes. These would enable suppliers to be innovative and compete within the market, while meeting the expected standards.

Supplier Guaranteed Standards of Performance (GSOP) questions.

Q9. Do you have any views on what the underlying rationale for the payment level and mechanism should be to best achieve the GSOP objectives?

It is Scope's view that the existing fixed payment level of up to £40 per breach is insufficient. This figure is far too low, given that the current average dual fuel energy bill is £146 per month.¹⁵ For disabled households reliant on medical equipment, these costs are much higher.

In 2025, data from Scope's DES service showed that disabled consumers faced an average monthly energy bill of £268. This is 84% higher than the current average dual fuel household bill. Additionally, of the 14,962 disabled consumers that sought our support, 2,491 (17%) carried an annual average of £2,270 of energy debt. 1,241 (50%) of those consumers faced particularly high levels, owing £1,000 or more each month.

With this context, it is clear why £40 would seem insignificant to any disabled household. This maximum compensation amount fails to recognise the scale of harm caused by breaches and does not account for financial circumstances faced by disabled households. Even for non disabled households, £40 represents only 27% of the average monthly energy bill. This drops to 15% for disabled households.

This disparity highlights the need for compensation to scale based on consumer circumstances – particularly monthly energy costs – severity of harm caused, whether the consumer is on the PSR or should be, and reliance on medical equipment.

In 2025, nearly a quarter of Scope's DES consumers relied on medical equipment at home, with 82% either turning their equipment off or considering doing so due to unaffordable bills.

During an Energy Security and Net Zero Committee hearing on 10 December 2025, representatives from Third Generation Environmentalism (or E3G) noted that energy suppliers are profiting an average of £500 from each consumer bill. This is evidenced by data from Common Wealth which reports that wholesalers, networks, and suppliers profit a quarter of every household energy bill.¹⁶

Energy networks have profited over £125 billion since 2020, with network costs (standing charges) accounting for £50 billion of the total profit.¹⁷

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Given these figures, it is reasonable that any breach should have meaningful financial consequences for energy suppliers. Without this change, suppliers have no incentive to improve service quality or prevent harm. Based on the extortionate profits that energy suppliers continue to make, the £40 maximum cap is indefensible.

Until the mechanism reflects the true scale of consumer risk and harm, supplier standards will continue to decline and consumers, especially disabled consumers, will continue to suffer the consequences.

Q10. Do you have any views on specific changes to the payment mechanism we should consider, including the examples included in this paper?

Ofgem should strengthen the GSOP payment mechanism through introducing repeat and escalating payments when a breach is ongoing and continues or worsens over time. This would ensure that compensation amounts reflect continued harm rather than a one off event.

There are circumstances where GSOP failures may not be captured automatically and could risk being exploited by suppliers, such as:

- An energy engineer failing to ensure safe access to the property.
- A welfare check is not completed despite it being a requirement.
- A PSR consumer reports supply loss but the case is mishandled.
- A consumer faces delays because information was not shared between the relevant supplier teams.

To prevent compensation loopholes, supplier staff should be required to manually log the breach to trigger the compensation. Without this safeguard, issues impacting consumers in vulnerable circumstances would not be captured. This would undermine the intended convenience of the GSOP compensation mechanism and Ofgem's monitoring.

Q12. Are there any issues we should consider with introducing variable payment levels for different consumer groups or severity?

A variable payment scheme based on potential harm would better reflect the risks faced by disabled consumers.

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Scope's research found that households with a disabled person face "an extra burden of energy" meaning they cannot safely reduce their energy use and are more likely to be negatively impacted by supplier mistakes like missed appointments or supply issues.¹⁸

Using PSR data would enable suppliers to identify when a consumer's circumstances would mean service failures would cause disproportionate harm. While we acknowledge the complexities involved, compensation should reflect the severity of harm based on a consumer's health needs and extra costs.

Suggested changes to compensation payments

- Based on the evidence provided, it is reasonable to suggest that non-disabled households should be compensated a minimum of two months of their total energy bill. This should become the default for supplier breaches and is a better reflection of the increased cost of energy and acts as a functional deterrent as well as compensation.
- For cases where a consumer in vulnerable circumstances goes without heating or electricity, this payment should be more than four months' worth of their energy payments. This would account for the 84% higher energy costs that disabled consumers have, the additional risks to their health, and the higher costs associated with them having to acquire alternative sources of energy.
- Where the consumer is on the PSR or should have been on it due to their circumstances, suppliers should provide a full three months of compensation.
- These suggested scaled amounts are per individual breach and would increase beyond the two or four month periods if a breach is ongoing or worsens over time.

Higher compensation for failures impacting PSR consumers would incentivise suppliers to prioritise robust support that aligns with the GSOP's intention to improve supplier behaviour. Ideally, suppliers would develop clear criteria that distinguishes between inconvenience and health risk; this would be supported by standardised regulator guidance detailing the expected compensation levels.

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Where exemptions apply for faults outside supplier control, these exemptions should not be applicable when the consumer is on the PSR or in vulnerable circumstances.

Overall, a variable payment model would allow GSOP to reflect the greater level of harm experienced by some consumers, and compensation must be meaningful and proportionate to the risk.

Q13. Are there any specific changes to the current set of exemptions that we should consider?

The existing GSOP framework lacks a clear and fixed definition of “outside of the supplier’s control.” Despite the document stating that compensation is not due where the issue is outside the supplier’s control, the lack of specific criteria would only lead to confusion and inconsistencies. There must be clear definitions to ensure supplier accountability and to manage consumer expectations.

It would be unfair to relieve suppliers of all responsibility where the initial cause is considered to be outside their remit. Regardless of the cause – providing it is not the consumer’s fault – the harm caused to disabled consumers can be severe. Where a supplier is aware of a consumer’s circumstances and reliance on medical equipment, there is still a duty to take all reasonable steps to restore the supply promptly. Omission due to the fault not being the direct responsibility of the supplier should not be considered an exemption.

It is vital that the PSR is used by all suppliers. For example, where a consumer has mobility issues and cannot answer the door, the supplier cannot use a consumer’s condition or disability as an exemption. Exemptions should never be used as an excuse to leave consumers without essential services.

To safeguard this, suppliers should only use exemptions where there is clear evidence that all reasonable and proportionate steps were taken to support the consumer, including first referring to the PSR. There should be specific examples of what constitutes a legitimate exemption and what remains the supplier’s responsibility.

Failure to support PSR consumers in these circumstances should trigger a case review. This could involve ensuring all required support measures were taken, communication was appropriate, and the exemption was

reasonable. Streamlining exemption criteria would ensure more consistent application, improved reporting and accountability, and greater protection for consumers most at risk when GSOP requirements are not met.

Q16. Are there any additional risks that we should consider when exploring our approach to monitoring and ensuring supplier compliance with the GSOP?

Ofgem must recognise the risks that may impact the accuracy of GSOP compliance reporting. While databases aim to streamline processes and Artificial Intelligence (AI) are helpful, they are not perfect and can make mistakes. Relying solely on data systems to identify consumers in vulnerable circumstances would be reckless and would have very real impacts on people's lives.

There is a danger that suppliers may unintentionally or knowingly miscategorise certain issues to avoid their GSOP obligations. A consequence of this would be the under recording of breaches, and an increase in complaints to the Energy Ombudsman.

This highlights the need for robust regulatory oversight, without a significant reliance on automated systems identifying issues. As previously stated, some consumers struggle to engage with digital systems, so Ofgem must ensure that suppliers have multiple contact methods available to consumers.

The method by which suppliers escalate safeguarding or welfare issues may be insufficient and not truly reflect the reality of the reporting. It is critical that Ofgem strengthen the monitoring around this specific element of the GSOP.

For more information, please contact:

Beth Light – Policy Advisor beth.light@scope.org.uk

Anees Iqbal – Policy Advisor anees.iqbal@scope.org.uk

Natalie Aykut – Data and Insights Adviser – Energy Proposition
Policy (Consumer Affairs) natalie.aykut@scope.org.uk

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³ Defined as a household with at least one disabled adult or child.

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⁶ Scope (2024), Our manifesto for an equal future, <https://www.scope.org.uk/campaigns/manifesto-for-an-equal-future>

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