

# Call for Input Response

## Consumer Outcomes

Ofgem

January 2026

[Dion.tickner@ageuk.org.uk](mailto:Dion.tickner@ageuk.org.uk) (or [policy@ageuk.org.uk](mailto:policy@ageuk.org.uk))

All rights reserved. Third parties may only reproduce this paper or parts of it for academic, educational or research purposes or where the prior consent of Age UK has been obtained for influencing or developing policy and practice.

Age UK  
7th Floor, One America Square  
17 Crosswall  
London  
EC3N 2LB  
T 0800 169 87 87 F 020 3033 1000  
E [policy@ageuk.org.uk](mailto:policy@ageuk.org.uk)

[www.ageuk.org.uk](http://www.ageuk.org.uk)

Age UK is a charitable company limited by guarantee and registered in England (registered charity number 1128267 and registered company number 6825798). The registered address is 7th Floor, One America Square, 17 Crosswall, London, EC3N 2LB.

## About the Consumer Outcomes Call for Input

Ofgem are seeking views on proposals for new 'consumer outcomes', and how we could use them to improve customer experience and promote innovation and growth. They are also asking for views on how these Consumer Outcomes could work alongside the existing regulatory framework to encourage the improvements they want to see, in terms of consumer standards, and understand how they can improve monitoring, compliance and communications to achieve these goals.

## About Age UK

Age UK believes every older person should be included and valued. We're working locally, nationally and internationally to change the way we age. Together with our partners, we're changing the day-to-day experience of getting older through essential services and local support. In the UK, the charity helps more than seven million older people each year by providing advice and support, including through our national advice line and our friendship services. It also researches and campaigns on the issues that matter most to older people, aiming to put older people at the heart of public policy and shift the way ageing is treated and represented.

## Introduction

Age UK welcomes Ofgem's focus on improving outcomes for energy consumers. We recognise suppliers' concerns about burdensome regulation and share the objective of ensuring that consumers have access to a competitive energy market that meets their needs. However, we have significant concerns that moving away from clear, prescriptive regulation towards more broadly defined consumer outcomes risks weakening protections for those least able to withstand harm, particularly older people. Our response therefore focuses on key factors Ofgem must keep in mind as it considers next steps in this area.

Many of the strongest consumer protections in the energy market exist because outcomes-based approaches have failed in the past. The current prescriptive rules governing the use of involuntary prepayment meters are a clear example. These safeguards were introduced only after widespread evidence of serious consumer detriment, including older people being left without heat or power. It was the introduction of detailed, enforceable requirements—not high-level expectations—that ultimately addressed unacceptable practices. Reducing prescription in this area opens the potential for repeating past mistakes and exposing consumers to severe harm.

The energy price cap provides a further example of why prescription has been necessary. It was introduced because competition and general consumer outcome objectives failed to deliver fair prices, particularly for disengaged consumers, many of whom are older. A move away from prescriptive protections risks allowing excessive pricing or unfair practices to re-emerge, potentially going unnoticed until significant harm has already occurred.

We are particularly concerned that broadly defined outcomes risk being interpreted very differently by suppliers and consumers. Concepts such as “fair treatment” or “fair pricing” are inherently subjective, and suppliers are highly unlikely to identify their own practices as resulting in unfair outcomes. Without clear standards, there is a risk that poor practices continue simply because suppliers believe they meet an outcome under their own interpretation. This ambiguity also makes outcomes far more difficult to monitor and enforce, potentially delaying regulatory action until consumer detriment—especially for older and vulnerable people—has already taken place.

Age UK is also concerned that negative consumer outcomes may only become apparent after harm has occurred. This reactive approach risks Ofgem having to reintroduce prescriptive regulation in response to emerging problems, creating regulatory uncertainty and avoidable disruption. Strong, preventative protections are preferable to remedial action taken after consumers have been harmed.

Finally, we note the lack of clear, measurable metrics for assessing whether consumer outcomes are being delivered. Outcomes that cannot be consistently measured, monitored and enforced risk becoming aspirational rather than effective. Robust metrics

are essential to ensure transparency, accountability and timely intervention, particularly for older people who may be less likely to complain or switch supplier.

We strongly believe that the current regulatory system is preferable to moving to an outcomes based one. Changing course to this approach requires a different regulatory skill set and a significant ramping up of both supervisory and enforcement capabilities and capacity. However, if Ofgem does proceed with this approach, it must be underpinned by clear definitions, objective metrics and a strong commitment to early intervention where outcomes are not being met. For older people, clarity, certainty and enforceable protections are not optional—they are essential to a safe, competitive and fair energy market.