



Committee on
Fuel Poverty

**Ofgem call for input: Energy Consumer Outcomes
Response from the Committee on Fuel Poverty
22nd January 2026**

The Committee on Fuel Poverty (the Committee) is an Expert Committee sponsored by the Department for Energy Security and Net Zero (DESNZ). The Committee advises on the effectiveness of policies aimed at reducing fuel poverty and encourages greater co-ordination across the organisations working to reduce fuel poverty.

The Committee welcomes the opportunity to respond to the call for evidence on Energy Consumer Outcomes. The Committee provides comments below on some of the consultation questions. The Committee's starting position is that the Consumer Outcomes are essentially another articulation of the requirements already in place on suppliers. The question is whether they will help suppliers to better understand obligations, give suppliers greater flexibility to provide a better service, and/or help consumers understand what they are entitled to receive.

Please note that this response only contains responses to the questions that were relevant to the Committee's subject area.

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?

The primary consideration in updating the regulatory framework should be to ensure that changes will improve consumer outcomes, and neither confuse matters further or just rearrange things. It is only worth integrating these Consumer Outcomes if they either replace a significant number of licence conditions or if they offer improved clarity, either by brigading licence conditions (and showing where prescription is maintained and where an outcomes focus is the appropriate standard) or by further explaining the standards of conduct.

The improvement might make it easier for suppliers to understand what they need to achieve whilst delivering an essential service. It might also be by making it easier for consumers to understand what they can expect from their supplier. Either way, they should make clearer than it currently is what the outcomes customers at risk of, or experiencing, fuel poverty should receive from their energy supplier.

And any change should do this in a way which allows for suppliers to differentiate themselves positively. This might be by allowing them to show a focus on greater innovation, which might be of particular importance to consumers whose primary focus is on technological developments towards net zero, through a focus on customer service, which may be particularly important for customers who are in fuel poverty, or a focus on other factors or a combination of them. This is important as



Committee on Fuel Poverty

there is nothing to suggest that all energy consumers place the same emphasis on different aspects of a supplier's performance. Customers struggling to pay their bills may wish to identify the suppliers most likely to provide the best service to help them in dealing with their particular circumstances, and any change should help them with this.

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?

The Committee believes there needs to be an explicit outcome related to fuel poverty. The current drafting of Outcome 1 is inadequate.

At the moment there is only an articulation relating to non-financial aspects, such as flexibility on repayment plans, referrals for specialist help, or management of debt. There is nothing about helping to prevent customers falling into debt, and actively helping them exit debt. In Ofgem's consultation response summary to its Consumer Vulnerability Strategy Refresh, it noted that there are 'affordability and debt workstreams within Ofgem and government, particularly when considering eligibility for targeted support.'¹

Recognising that fuel poverty is an issue that government and Ofgem (at least to an extent) need to address, any articulation of consumer outcomes needs to include one that articulates an expectation around the financial aspects of fuel poverty. Without this, an important area for many consumers is simply ignored as a consumer outcome.

This might be couched in general terms, and does not need to introduce a new obligation on suppliers absent clear requirements being imposed. But it would make clear this remains an issue that Ofgem expects suppliers to have regard to and will monitor. For example, Outcome 1 could be amended along the lines of: Customers in, or at risk of debt or arrears receive proactive, tailored, and consistent customer service, *and when appropriate financial support*, that meets their needs and helps them sustainably *avoid falling into debt*, or *pay off* their debt or arrears.

Q4. Do you think we should streamline or consolidate the Consumer Outcomes further and, if so, which should we prioritise?

And

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 Committee believes other organisations are better placed to comment on this question. We note, however, a degree of duplication and inconsistency between

¹ [Consumer Vulnerability Strategy: Refresh](#)



Outcomes 1 and 8, regarding financial vulnerability, which could and should be avoided. The explanations of these outcomes in appendix 3 uses similar but slightly different explanations on how they should help consumers. For example 'offering flexible repayment plans' (explaining outcome 1) but 'offering flexible payment options and frequencies to help them manage their bills' (explaining Outcome 8).

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

It is highly likely that different types of customers place different value on aspects of suppliers' offerings, and hence different outcomes are more important for them. The Committee's primary focus is on consumers who are struggling to pay for energy, and for those customers Outcomes 1 and 8 are the most important, noting comments above on partial duplication and the need to broaden the definition of Outcome 1.

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.

a) What level of action/intervention do you feel would be proportionate to drive up customer service in the non-domestic sector? Does it differ from domestic?

There may be positive benefits from regulatory integration of Consumer Outcomes, if it genuinely replaces much of the rulebook rather than is just added to the rulebook. However, it would be far from a trivial exercise. Ofgem started down this route in introducing the standards of conduct (SLC0/0A) but did not pursue the removal of licence conditions that introducing principles allowed (along the lines pursued by, for example, the SRA).² The Committee queries whether Ofgem really has the appetite and bandwidth to prioritise wholesale change to the supply licence in this regard at the same time as addressing all its other priorities.

It may be more realistic to embed the Consumer Outcomes within the standards of conduct guidance.

The Committee does not see significant benefit in an annual consumer outcomes report. The consultation suggests that there may be reputational incentives resulting from this. However, if it wants to use this approach Ofgem should seek evidence this works and they are best placed to deliver it. For example, Citizens Advice already publishes regular star ratings of energy suppliers on their website.³ Whilst this is interesting and can be useful for consumers, press coverage (by which most consumers will become aware of the results) tends to focus on the very best and very worst suppliers. As such, reputational incentives from the star ratings, as driven by press coverage, are primarily to avoid being the poorest rated supplier. It is not

² [Standards of Conduct Guidance](#)

³ <https://www.citizensadvice.org.uk/consumer/your-energy/get-a-better-energy-deal/compare-domestic-energy-suppliers-customer-service/>



Committee on
Fuel Poverty

clear that reputational regulation in the energy market currently addresses improving average or mediocre performance.

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?

No. This would essentially be asking suppliers to publicly state they are committed to complying with their licence obligations. They should already be committed to this. It is hard to see this adding value. If this were to promote sharing of good practice, it is not clear Ofgem is best placed to deliver this – for example Energy UK already has a Vulnerability Commitment, which encourages sharing of good practice among members in supporting consumers in vulnerable circumstances.

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

The key factor to consider is whether Ofgem thinks there is only one way a supplier can deliver something fairly. For example, it would be nonsensical to impose to guaranteed standard of performance requirement to make a payment to a customer for failure to deliver ‘in a timely manner’ rather than within a specific timeframe.

Which requirements require prescription will also depend on the impact of failure to address the issues satisfactorily on the customers concerned. Consumers in fuel poverty can be significantly impacted if suppliers do not act in those customers’ best interests. So any prescriptive rules should be removed only with great caution.