
Tackling Energy Debt in the Supplier Home-Move Process - Call for Input: Summary of Responses

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This document summarises the responses we received to our [call for input on introducing changes to tackle debt build-up during the home moves process](#), published in December 2025. It includes views from consumers, charities, and various other stakeholders. It also provides an update on our policy position and sets out our next steps on tackling energy debt in the home moves process.

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Executive summary

In December 2025 we sought views on potential reforms to the home moves process. These were centred upon the utilisation of smart PPM to limit a customer's ability to inadvertently build up debt. Many stakeholders told us that this was not a new occurrence - customers could move into a property today that is already supplied in smart PPM mode or has a traditional PPM meter installed. Some suppliers are also already applying new approaches to change of tenancy, as they are not restricted from doing so currently, as long as they comply with existing protections for deemed contracts.

The proposed reforms aim to provide consistent guidelines for suppliers, to support reducing the build-up of energy debt, improving accuracy in account set up, and strengthening protections for consumers, particularly those in vulnerable situations. We received responses from a wide range of stakeholders, including energy suppliers, consumer groups, charities and individual consumers.

Across stakeholder groups there was broad recognition that the current home moves process does not consistently work well for consumers or suppliers. Respondents agreed that delays in establishing named accounts, uncertainty around responsibility for charges and difficulties with communication commonly contribute to debt accumulation and prolonged disputes.

Suppliers generally supported the proposed reform, as they provided evidence that the current process is a significant driver of debt and the reform will support reducing energy debt and increasing efficiency. However, suppliers offered differing views on the most appropriate regulatory framework. Some favoured a flexible, outcomes-based approach that would allow for innovation and accommodate variations in systems and capabilities. Others advocated for more prescriptive requirements to ensure consistency and minimise consumer risk.

However, consumer groups and charities were cautious about the proposed approach, emphasising the potential for harm if reforms were not accompanied by robust, enforceable protections. These organisations highlighted that many consumers already encounter significant barriers when interacting with suppliers during home moves, such as long wait times, unclear instructions, language and literacy challenges, as well as difficulties providing documentation. They stressed that any reform must prioritise accessibility, fairness and early identification of vulnerability.

Following the Call for Input, we held a series of stakeholder working group sessions, to collaborate with suppliers, consumer groups, and charities to co-create a new approach to the supplier home-move process. These sessions helped us to develop further the details

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of how this policy would be implemented and covered key areas such as supplier communications, consumer protections, and additional support credit.

This publication aims to summarise the responses we received and indicate trends found in the views shared. Noting that there were diverse opinions within each group, this document captures the key trends, viewpoints and other significant perspectives.

1. Consumer responses overview

- 1.1 We received limited numbers of individual consumer responses to our call for input, so we are unable to draw broader conclusions about the public's view of these proposed changes to the home moves process from these responses.
- 1.2 Some individuals who responded opposed the proposed changes to the home moves process. However, some expressed support, generally based on principles of fairness and the view that individuals should be responsible for their own energy debt.
- 1.3 Many responses highlighted long-standing concerns regarding supplier practices, including inherited or misallocated debt being applied incorrectly to new accounts, protracted disputes that in some cases remained unresolved for several years, inaccurate opening meter readings and billing errors, and persistent difficulties accessing effective customer service. Respondents described long waiting times, challenges reaching the appropriate teams, and a general perception that suppliers were unable to resolve issues in a timely or consistent manner.
- 1.4 Some respondents raised concerns around the introduction of automatic switching to prepayment mode at the point of moving into a property. They viewed this proposal as punitive and unfair at a time when households may already be experiencing considerable stress and financial pressure. Some consumers were also concerned about the use of smart meters and the principle of remote switching without explicit consent.
- 1.5 However, some respondents supported the proposal to switch to prepayment mode at move in. These individuals often referred to their own experiences of confusion or debt inheritance when moving into a property and saw the proposal as a means of ensuring that responsibility for energy use was clearly established from the outset. Supporters also argued that the approach could help prevent outstanding debt from being transferred to other billpayers.
- 1.6 Overall, consumer feedback demonstrated a clear desire for improvements to the current process, with calls for greater clarity, consistency, and consumer protection. While views on the proposed reforms varied, respondents were generally aligned in their view that the existing system does not meet consumers' needs and that meaningful reform is required to support a fair and effective home moves process.

2. Context: debt levels and unnamed energy accounts

Q1. Please provide evidence or data with respect to levels of debt or arrears in the sector relating to change of tenancy.

Supplier responses

- 2.1 Suppliers provided extensive evidence demonstrating that debt linked to home moves represents a significant and persistent issue across the sector. Several suppliers reported high volumes of unnamed or unverified accounts, with associated high debt levels that had accumulated over prolonged periods.
- 2.2 Suppliers explained that accounts often remain unnamed for extended periods due to delays in receiving move out and move in notifications from consumers, resulting in consumption being charged to interim accounts that may not ultimately be recoverable.
- 2.3 While the detail and format of data they provided varied, suppliers strongly agreed that debt relating to home moves represents a serious issue in the sector that needs to be tackled quickly. All suppliers welcomed the opportunity for reforms that could change consumer behaviour, improve accuracy in account set-up, and reduce the build-up of debt related to change of tenancy.

Consumer groups and charities responses

- 2.4 Consumer groups and charities did not have quantitative data on debt available to share but provided extensive case-study based evidence illustrating the challenges faced by households during home moves. These organisations highlighted that consumers often face significant challenges in resolving disputes about liability for charges incurred before their occupancy, particularly where suppliers require extensive documentation to verify move-in dates or opening meter readings.
- 2.5 Several charities noted that they regularly support clients who have inherited debt or who have been incorrectly billed for usage relating to previous occupants. They reported that such disputes can lead to prolonged periods of arrears, during which consumers may experience stress, disconnection risk, or broader financial hardship. Many groups emphasised that individuals in vulnerable circumstances are at heightened risk, particularly where communication barriers, insecure housing, language needs or limited digital access prevent timely contact with suppliers. They noted that in many cases, debt escalates because consumers

struggle to navigate supplier systems, rather than due to any unwillingness to pay.

- 2.6 Overall, consumer groups and charities stressed that reforms to the Change of Tenancy process must prioritise accuracy, consistency and timely resolution, particularly given the high risk of harm when debt is wrongly allocated to households.

Q2. Please provide evidence or data you may have about a customer's experience when moving into a new property and setting up their energy account.

Supplier responses

- 2.7 Suppliers provided qualitative information about the customer experience during home moves, noting that the accuracy and timeliness of customer information is central to effective account set up. Several suppliers observed that customers frequently move into a property without engaging with their energy supplier in the early stages, which can result in delays in establishing the correct account details. Suppliers highlighted that this often leads to confusion regarding responsibility for consumption, disputes about opening meter readings, and challenges in identifying the appropriate point at which billing should commence.
- 2.8 Suppliers reported that customers frequently raise concerns about the lack of clear guidance on the steps required to set up an account when moving into a new property. Several respondents commented that customers often expect the process to be automatic and do not seem to understand the need to contact their supplier proactively. This can lead to prolonged periods without confirmed details, during which billing cannot be accurately allocated. Some suppliers also highlighted that when customers do contact them, long wait times and difficulty reaching the correct teams can add to customer frustration.

Consumer groups and charities responses

- 2.9 Consumer groups and charities reported that individuals frequently experience uncertainty and inconsistency when attempting to set up energy accounts after moving into a property. Many organisations noted that their clients often encounter difficulty identifying the incumbent supplier, particularly where there is limited or outdated information available within the property. They highlighted

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that this can delay the process of setting up an account, increasing the likelihood of disputes regarding liability and meter readings.

- 2.10 Charities indicated that customers often struggle to provide the documentation requested by suppliers to evidence their move in date. This can be a particular challenge for individuals in private rented accommodation, those with informal tenancy arrangements, or those fleeing domestic abuse or leaving care.
- 2.11 In addition, consumer groups noted that customers frequently receive inconsistent or unclear advice from suppliers regarding the steps required to establish an account. Some organisations reported that their clients have been passed between multiple teams or required to repeat information several times, contributing to a sense of confusion and frustration. These organisations emphasised that the cumulative effect of these challenges can create financial stress and undermine trust in suppliers, particularly for vulnerable households.
- 2.12 Many organisations expressed concern that proposals involving changes to meter mode at move in could exacerbate these risks if customers are unable to make contact quickly.

3. Scope: designing a new approach to Change of Tenancy

Q3. Do you have views or preferences regarding the approach we take to enabling the proposed changes to the supplier home moves process?

Supplier responses

- 3.1 Suppliers expressed a range of views on how best to facilitate changes to the home moves process. Many indicated a preference for a flexible, principles-based framework that sets clear objectives but allows suppliers discretion to design processes aligned with their operational systems. These respondents considered that an outcomes-based model would support innovation, enable quicker implementation and allow suppliers to adapt approaches to diverse customer circumstances.
- 3.2 Other suppliers favoured a more prescriptive model, arguing that minimum standards should be clearly defined in regulation to ensure consistency across the sector. These respondents noted that prescriptive rules can help prevent customer harm and promote clarity, particularly in areas such as consumer protections, information requirements and responsibilities during the transition period.
- 3.3 Across all responses, suppliers emphasised the importance of maintaining clarity, supporting cross-industry consistency and ensuring that any changes are backed by effective operational guidance. Some also highlighted the need for improved data flows and information sharing to underpin any new arrangements.

Consumer groups and charities responses

- 3.4 Consumer groups and charities strongly advocated for a more prescriptive approach. They emphasised that consumers benefit from clear, enforceable rules that limit variation in supplier practices. Many expressed concern that an outcomes-based model would result in unpredictable experiences for consumers and could leave individuals, particularly those in vulnerable circumstances, at risk of harm.
- 3.5 These organisations argued that key elements of the home moves process should be codified in regulation, including requirements for clear communication,

consistent treatment of consumers regardless of meter type, and safeguards to prevent inappropriate allocation of debt. Several highlighted the importance of establishing mandatory processes for identifying vulnerability and ensuring rapid access to support.

Q4. Do you prefer a outcomes-based approach or something more prescriptive for consumer protections in Change of Tenancy?

Supplier responses

- 3.6 Suppliers expressed mixed preferences regarding the regulatory model for consumer protections. Many supported an outcomes based approach, arguing that this allows suppliers to tailor customer journeys, respond to emerging risks and innovate in ways that deliver better experiences. These respondents noted that excessive prescription could hinder flexibility and prolong implementation.
- 3.7 Others favoured a prescriptive baseline that establishes minimum protections for all consumers. These suppliers argued that clear rules reduce uncertainty, encourage consistency and help safeguard consumers during periods when they may be less able to engage effectively.
- 3.8 Across suppliers, there was broad recognition that a hybrid approach may be necessary, combining high-level outcomes with targeted prescriptive requirements in areas such as vulnerability, minimum support levels and communications.

Consumer groups and charities responses

- 3.9 Consumer groups and charities generally supported a prescriptive framework for consumer protections. They emphasised that protections must be clear, enforceable and consistent across suppliers to avoid variation that could expose consumers to harm. Many argued that an outcomes-based model would not provide sufficient certainty or accountability, particularly given the complexity of the home moves process.
- 3.10 Organisations highlighted the need for strong minimum requirements addressing vulnerability, temporary protections during the transition to a named account, and clear routes to revert to preferred payment methods. Several groups recommended that any significant change to the process should first be tested through carefully monitored trials.

- 3.11 Overall, these organisations viewed prescriptive protections as essential for mitigating risks and ensuring equitable treatment.

Q5. Do you have any views on the above suggestions for consumer protections or have any alternatives that should be considered?

Supplier responses

- 3.12 Suppliers agreed that consumer protections should form part of any revised home moves process, although views varied on the scope and robustness of the measures required.
- 3.13 Some suppliers felt that existing protections for consumers are sufficient, citing the home move process for properties with legacy PPM's as providing a standard. These respondents tended to favour utilising existing safeguards rather than additional requirements.
- 3.14 Some other suppliers emphasised that stronger protections may be necessary, particularly for customers with vulnerabilities. They highlighted the importance of ensuring that individuals requiring additional support are identified at the earliest opportunity and that provisions exist to mitigate the risk of hardship during the transition to a named account.
- 3.15 Several suppliers proposed alternative or complementary measures, including clearer communication pathways, better advance notification from landlords or agents, enhanced data sharing and improvements to industry processes governing meter operation or account setup.

Consumer groups and charities responses

- 3.16 Consumer organisations generally considered the proposed protections inadequate and emphasised the need for significantly stronger safeguards. Many expressed concern that consumers could face heightened risks during the period before engagement, particularly if any form of meter mode change occurs without prior contact. They argued that protections must account for the realities of moving home, including periods when consumers may be unreachable, unable to navigate supplier processes or unaware of their obligations.
- 3.17 Charities proposed a wide range of strengthened measures, including clearer limits on the use of prepayment mode, enhanced rights to revert promptly to preferred payment methods, mandatory checks for vulnerability prior to meter

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mode remote switching, improved dispute resolution routes and clearer communication requirements. Some organisations suggested alternative policy approaches entirely, such as improved landlord notification systems or incentives that encourage earlier customer engagement rather than changes to meter mode.

- 3.18 Overall, consumer groups stressed that protections must be robust, consistent and centred on preventing harm, particularly for households least able to navigate complex processes during a move.

4. Stakeholder working group feedback

- 4.1 Alongside responses to the Call for Input, we convened a series of stakeholder working group sessions to support the development of potential changes to the Change of Tenancy process. These sessions brought together a range of suppliers, consumer groups, and charities to explore risks, safeguards and practical considerations associated with reform, with a particular focus on consumer protection and operational feasibility.
- 4.2 The working groups considered a number of specific issues, including whether zero standing charge tariffs could play a role within the CoT process, how credit on a meter should be calculated at move-in, and how and when suitability for continued use of prepayment mode should be assessed. Stakeholders also discussed the role of communications in supporting effective home moves, including the potential value of broader community-level communications to improve consumer awareness, alongside targeted communications before and after a move-in to support timely engagement.
- 4.3 Key concerns raised by stakeholders included how to engage landlords in the process, whether SMETS1 meters should be included, and how data could be shared better between parties to speed up identification.
- 4.4 Overall, the working group discussions highlighted the importance of balancing operational flexibility with clear, consistent consumer protections, and reinforced the need for any changes to be supported by accessible communications and robust safeguards, particularly for consumers in vulnerable situations.

5. Update on our position and next steps

- 5.1 Following the evidence received from the CFI, there is broad consensus across all stakeholder groups that the current home moves process does not consistently work well for consumers or suppliers. Respondents agreed that delays in establishing named accounts, uncertainty around responsibility for charges and difficulties with communication commonly contribute to debt accumulation and prolonged disputes.
- 5.2 Suppliers provided extensive evidence demonstrating that debt linked to home moves represents a significant and persistent issue across the sector. Several suppliers reported high volumes of unnamed or unverified accounts, with associated high debt levels that had accumulated over prolonged periods. Some suppliers are also already applying new approaches to change of tenancy, as they are not restricted from doing so currently, as long as they comply with existing protections for deemed contracts.
- 5.3 CGCs highlighted the significant challenges consumers face in resolving disputes about liability for charges incurred before their occupancy, particularly where suppliers require extensive documentation to verify move-in dates or opening meter readings. They also regularly support clients who have inherited debt or who have been incorrectly billed for usage relating to previous occupants. Disputes of this nature can lead to prolonged periods of arrears, during which consumers may experience stress, disconnection risk, or broader financial hardship.
- 5.4 Furthermore, both suppliers and CGCs highlighted that many customers could move into a property today that is already supplied in smart PPM mode, or has a traditional PPM meter installed and available information and support may be inconsistent. Some suppliers are also already applying new approaches to change of tenancy, as they are not restricted from doing so currently, as long as they comply with existing protections for deemed contracts.
- 5.5 Taking these stakeholder positions and evidence into account, our next steps are to consult on bespoke guidance for the home-moves process. This will enable Ofgem to standardise key elements of the home-moves journey where we believe the most risk of harm to consumers will require careful mitigation. It will also provide the opportunity to standardise the outcomes we expect to see for consumers throughout this journey and clarify guidance for suppliers. This consultation will be published later on this year.