



Supporting innovation in the electricity retail market - Consultation Response

From End Fuel Poverty Coalition <[REDACTED]>

Date Tue 15/09/2026 10:19

To Markets Strategy & Delivery <marketsstrategy&delivery@ofgem.gov.uk>

Y [REDACTED]

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Dear Ofgem,

The End Fuel Poverty Coalition opposes the proposal to exempt suppliers with fewer than 50,000 domestic customers from the Universal Service Obligation.

Please accept this email as our consultation response. We are happy for it to be published unredacted.

The USO is not a barrier to entry, it is a foundation of consumer protection. Removing it for a defined class of suppliers permits selection by risk and the customers most likely to be refused are those in fuel poverty, in debt, on prepayment meters, on the Priority Services Register or on meters that are costly to service.

Ofgem has not evidenced that the USO is a material barrier to entry, nor modelled the likely impact of its removal from a group of suppliers. We are also concerned that if exempt firms can select the cheapest customers, obligated suppliers will then carry higher costs and those costs will end up in the price cap methodology and therefore land on the bills of households. There appears to have been no impact assessment made on this point.

This consultation is part of a wider pattern that concerns us, in which enforceable licence rules are replaced by discretion and judgement which will weaken consumer protections at a time they should be strengthened.

If Ofgem proceeds with this proposal regardless, the minimum safeguards should be an explicit prohibition on refusing supply by payment method, debt status, credit score or PSR status, mandatory reporting by exempt suppliers of every refusal and its reason and a sunset clause with a subsequent published review of operations.

We are happy to provide this on headed paper if required.

Best wishes,
Simon Francis, Coordinator