

Consultation

Moving home process guidance consultation

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This consultation asks for stakeholder feedback on proposed new guidance for the home moves process. The guidance is designed to support suppliers in delivering good customer outcomes during the home moves process by providing protections for customers who move into a new property without immediately registering for an energy account with a supplier. It clarifies a supplier's ability to remotely switch existing smart meters to smart pay as you go mode where they have identified that a customer has left the property and a new account has not been set up. Customers who have not set up an account will be protected with a minimum "grace period" to access energy, before being required to set up their account. The consultation document details our case for change for this intervention and our approach to consumer protection and compliance.

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1. Introduction

We are consulting on changes to the Deemed Contracts guidance to implement a home moves process that creates good customer outcomes. This section sets out the background to the proposals that we are consulting on.

- 1.1 Alongside this document, we have published a joint energy debt circuit breaker with the Department for Energy Security and Net Zero (DESNZ). This outlines our aims:
 1. **Relief** – In the immediate term, we will provide targeted, one-off debt relief for vulnerable households to give them breathing space.
 2. **Repayment** - Debt relief must go hand in hand with a route back to financial stability. We will support households to re-engage with their supplier and take practical steps to prevent debt building up again.
 3. **Reform** – And in the medium to longer term, we will tackle the root causes of energy debt by modernising payment systems, improving supplier practices and making greater use of smart meters.
- 1.2 This consultation seeks to support this strategy by reforming the journey customers go through when moving home. This aligns with the strategy's objective of **greater use of modernised payments methods and practices to remove barriers to payment**. We will achieve this by providing suppliers with a process where they can better control access to credit and reduce the risk of customers accumulating unmanageable debt, whilst retaining protections for vulnerable customers.
- 1.3 This will also support the objective of **improved consumer engagement mechanisms**. The process encourages customers to engage with the supplier promptly when they move into a property, recognising that early engagement can support suppliers to provide tailored support to vulnerable customers.
- 1.4 While not introducing any new Standard Licence Conditions (SLCs), the process described in the draft guidance adheres to existing regulation and seeks to protect customers. The process, known as the home moves process, encourages customers to engage with the supplier promptly when they move into a property, recognising that early engagement can support suppliers to provide tailored

support to vulnerable customers. The home moves process forms part of Ofgem's wider debt management reforms, in that it aims to prevent the build-up of energy debt in the long term.

- 1.5 Many households face genuine payment difficulty and continue to struggle with debts accrued during and after the energy crisis. Over the past three years, rising energy costs have driven a significant increase in household arrears, now averaging £1,872 for electricity and £1,613 for gas per account without a repayment plan, up 9.1% and 8.4% respectively on the previous year.¹ This continued growth reflects a need to tackle the ongoing build-up of debt. We also recognise that features of the market can make it easier to get into debt, such as inaccurate bills or the ability to access energy without setting up an account.
- 1.6 Change of tenancy (which we refer to as the 'home moves process') is an industry term referring to the process whereby the occupier responsible for energy bills moves out of a property and a new occupier takes responsibility for the energy account. As part of this process, the supplier creates a 'deemed contract' under the name of 'the occupier', designed to act as an interim until the new customer contacts the supplier and they can be named on the account.² Accounts named as 'the occupier' are often referred to as 'unnamed accounts'. If the new occupier does not contact the supplier to claim the account and pay the energy bill, debt will accumulate.
- 1.7 In December 2025, we published our [Call for Input on tackling energy debt in the home moves process](#). This set out our rationale for reforming the process, given that the home move is a core point at which debt can build up. This Call for Input set out how suppliers could remotely switch smart meters into prepayment mode following notification that a customer was leaving a property. Smart meters in prepayment mode are referred to as smart pay as you go (SPAYG) in this consultation and associated guidance.

¹ [Debt and arrears indicators | Ofgem](#)

² SLC 7.3 and SLC 7.4 in the Gas and Electricity Licence Conditions

- 1.8 This consultation is not, however, proposing to obligate all domestic energy suppliers to adhere to the process laid out in the guidance. Rather, suppliers already have the regulatory ability under the existing SLCs to implement a home moves process they deem suitable. The proposed guidance does, however, provide a route that adheres to regulatory requirements and provides suitable customer protections to switching to SPAYG as part of the home moves process. We recognise that some suppliers may adapt the processes laid out in the draft guidance, and it will be their responsibility to ensure any implemented process is suitable and sufficient.

Purpose of this consultation

- 1.9 This consultation seeks views from stakeholders on our proposed guidance on remote SPAYG switching for domestic customers as part of the home moves process.
- 1.10 This consultation is separate to the [prepayment meter protections discussion paper](#), published on 28 October 2026, which discusses the current protections for installing PPM for debt without the customer's consent (Involuntary PPM). Crucially, the home moves process outlined in this consultation is not designed to recover debt and can only occur when a deemed contract is in place.

Context and related publications

- [Affordability and debt in the domestic retail market – a Call for Input](#)
- [Improving debt standards in the domestic retail market](#)
- [Debt Strategy: a 'reset' and 'reform' for customers in debt](#)
- [Debt strategy update: supporting the reduction of energy debt](#)
- [Markets Regulatory Strategy and Vision to 2030](#)
- [Tackling energy debt when moving home](#)
- [Consumer outcomes strategic direction](#)
- [Prepayment meter protections: discussion paper](#)
- [Involuntary prepayment meter rules: phase 1 process evaluation](#)
- [Behavioural strategies for preventing and reducing energy arrears](#)

Overview

- 1.11 Section 2 of this consultation provides our Case for Change, explaining why we intend to introduce guidance on the home moves process.
- 1.12 Section 3 sets out our analysis of the key customer protection and communication considerations applicable to the home moves process, and how we expect those risks to be mitigated by suppliers.
- 1.13 Section 4 sets out our approach to assurance and monitoring of the home moves process.
- 1.14 Section 5 summarises the findings of the assessment of impacts.
- 1.15 The annexe includes a list of the consultation questions, the assessment of impacts, and the privacy policy.

Consultation stages

Stage 1 Consultation open: 28 October 2026

Stage 2 Consultation closes. Deadline for responses: 9 December 2026

Stage 3 Responses reviewed and published: Spring 2027

Stage 4 Consultation outcome (decision or policy statement): Spring 2027

How to respond

We want to hear from anyone interested in this consultation. Please send your response to the person or team named on the front page of this document.

We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website.

Your response, data, and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information. For example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations, or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the United Kingdom's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

How to track the progress of a consultation

1. Find the web page for the call for input you would like to receive updates on.
2. Click 'Get emails about this page', enter your email address and click 'Submit'.
3. You will receive an email to notify you when it has changed status.

A consultation has three stages: 'Open', 'Closed (awaiting decision)', and 'Closed (with decision)'.

2. Case for Change

In the case for change we set out our rationale for reforming the home moves process.

- 2.1 As set out in the joint energy debt circuit breaker, reducing the flow of debt is one of our key priorities, and our proposed reform to the home moves process supports that objective, by reducing the number of unknown “occupier” accounts that can accrue debt.
- 2.2 In our call for input, we set out our initial view that a standardised home moves process could support our overall debt strategy and work to prevent the further accumulation of debt for domestic customers.
- 2.3 We consider that the home move process is a key point at which energy debt can arise, both intentionally or unintentionally, and it represents a critical intervention point for policies aimed at preventing debt from accruing in the first instance.

The current process

- 2.4 In Great Britain, energy supply is available immediately upon moving into a property, unless a traditional PPM is installed or a smart meter is operating in SPAYG mode. While this allows continuity of service, it can also lead to lower levels of initial consumer engagement compared to other essential services, such as broadband or council tax, where proactive setup is required. For some customers, this can remove the incentive to contact the energy supplier quickly or at all.
- 2.5 Debt can build up during the home moves process where there is ambiguity over responsibility for energy consumption. This occurs when customers do not inform suppliers that they have moved into or out of a property. Delayed engagement with an energy supplier can cause the consumer to later receive significant bills for consumption that they had no oversight over. In addition to unnecessary financial hardship, this can lead to avoidable complaints and increased operational complexity for the supplier.

- 2.6 Lack of engagement by consumers is a significant factor in rising levels of energy debt. The current process can leave suppliers unaware of who is responsible for a property for extended periods of time, creating uncertainty over billing and liability. Suppliers are often required to undertake resource-intensive investigations to determine responsibility retrospectively, relying on evidence that may be incomplete or unavailable.
- 2.7 These factors increase operational costs (borne by all consumers), place pressure on customer service teams, delay support options to vulnerable customers and divert resources away from proactive customer support and value-adding activities. Delays in establishing responsibility for supply can also lead to poorer debt recovery outcomes, increased bad debt exposure and heightened regulatory and reputational risk where customers perceive billing outcomes to be unfair.
- 2.8 The current process encourages reactive rather than proactive customer engagement. Ultimately, where this debt cannot be recovered, the associated costs are socialised across the wider customer base, increasing costs for all consumers.

Our proposed approach

- 2.9 The home moves process outlined in this consultation seeks to answer the issues outlined above and improve customer outcomes and the investability of the energy market as a whole. The proposal seeks to ensure that responsibility for energy consumption and consumer circumstances are identified promptly, reducing the risk of unmanaged consumption and debt accumulation.
- 2.10 Following confirmation that a customer has moved out of a property, remote switching to SPAYG significantly reduces the risk of energy being consumed without an identified consumer. For the new occupier, this should help minimise the incidence of large unexpected opening bills and reduce the likelihood of consumers unknowingly accruing significant debt upon moving into a property.

- 2.11 We view that SPAYG, when supported by clear consumer safeguards, can deliver tangible benefits for consumers, particularly those who want greater control over their energy use and budgeting. SPAYG automates meter readings, removing the need for manual top ups, and shows real time consumption data. This helps households understand patterns, spot unexpected spikes and make informed decisions about how and when they use energy.
- 2.12 Evidence from the Energy Consumer Satisfaction Survey (using July/August 2025 and January 2026 data) found that, after controlling for demographic and energy-related characteristics, customers on SPAYG reported higher levels of satisfaction than customers on both standard credit and direct debit tariffs. The analysis also found that customers with smart meters tend to report higher satisfaction than those without, suggesting that the benefits associated with smart meter functionality, including greater visibility and control over energy use and spending, may contribute to improved customer.³
- 2.13 For the home moves process, the remote functionality of SPAYG allows suppliers to respond efficiently when notified of a home move. The proposal adopts a proactive approach to preventing debt accumulation, rather than relying on retrospective interventions once debt has already arisen.
- 2.14 The proposal should also strengthen customer awareness of their responsibility for the energy supply, creating a clearer link between occupancy and payment responsibility and facilitating earlier support opportunities.
- 2.15 There are several key benefits to contacting a supplier quickly upon the home moves process for the new customer:
- A smoother and more transparent moving-home experience, reducing the likelihood of unexpected charges and account-related issues arising after the move;

³ [Energy-Consumer-Satisfaction-Survey-Findings-Report-January-2026.pdf](#)

- Access to the most appropriate tariff, support services and payment arrangements from the outset of occupancy, helping customers manage costs and avoid preventable debt;
- Improved continuity of support for vulnerable customers, ensuring that services, such as the Priority Services Register and other protections, can be applied as quickly as possible;
- Reducing the risk of customers facing unexpected liabilities or significant debt by ensuring responsibility for energy consumption is established and communicated at the earliest opportunity;
- Earlier access to affordability support and payment options where consumers may be struggling with energy costs;
- Visibility and control over their energy consumption and billing; and
- Access to tailored advice on the property's energy technologies and heating systems, such as electric vehicle charge points, heat pumps or other low-carbon technologies, helping customers identify the most suitable tariff and make informed energy decisions.

2.16 There are also benefits for the outgoing customer to inform their supplier that they are leaving the property as soon as possible, primarily relating to ensuring they are correctly billed for their own usage and not the new customer. This process does, however, focus on incentivising the new customer to promptly engage.

2.17 Those who switched tariff while remaining with the same supplier are also associated with better satisfaction. Switching tariff while staying with the same supplier delivers a bigger uplift in satisfaction than moving to a new supplier, suggesting that customers particularly value getting a better deal without the disruption of changing provider.⁴

2.18 In an ideal scenario, all customers would engage with a supplier before they move, and smart meters would only be switched to SPAYG if this was appropriate for the customer. We view that suppliers do have a role in encouraging early

⁴ [What drives consumer satisfaction with energy suppliers - Report.pdf](#)

engagement, and we are keen to explore what existing incentives suppliers offer to customers to encourage them to remain with them when the customer moves into a new property.

- 2.19 We do also recognise that this guidance will need to be accompanied by a communications campaign that accurately informs customers of their responsibilities. A current challenge of the home moves process is the limited data sharing between stakeholders, leading to poor or incomplete data as to who has responsibility for energy bills. Ofgem, suppliers and consumer groups and charities (CGCs) will need to play a key role in supporting customers in understanding what is required of them and to support the overall success of this guidance. In response to our call for input, several CGCs highlighted the need for clear protections for vulnerable customers.
- 2.20 Overall, we consider the proposed guidance to represent a more transparent, efficient and consumer-focused approach to managing home moves.

3. Policy considerations

This section discusses the policy issues that have informed our proposed approach to the home moves process.

Overview

- 3.1 This section sets out the policy considerations that have informed our proposed approach to the home moves process. It focuses on the areas where we consider additional clarity is needed to support good consumer outcomes, including customer protection, customer communications, and the role of landlords and housing associations.
- 3.2 We explain how existing regulatory obligations are expected to apply where a supplier remotely switches a smart meter to SPAYG during the home moves process. We also set out how our proposed guidance is intended to reduce complexity, support engagement between customers and suppliers, ensure that customers can maintain access to energy and appropriate protections are in place where needed.

Customer protection

- 3.3 As laid out in Section 2, the current home moves process presents a number of risks to customers, including unexpected backdated bills and uncertainty over responsibility for energy consumption. Reforming the home moves process gives us the opportunity to reduce these consumer harms, streamlining and minimising confusion. However, we recognise that risks for vulnerable customers will remain and are seeking to mitigate these whilst also delivering processes that reduce the build-up of debt.

Stakeholder Feedback

- 3.4 Suppliers agreed that customer protections should form part of any revised home moves process, although views differed on the appropriate scope. Some considered existing protections sufficient and preferred to rely on current

safeguards, highlighting that this process does already occur in properties with legacy prepayment meters or smart meters in SPAYG mode. Others considered that additional protections may be required, particularly to support customers in vulnerable situations, including earlier identification and appropriate support during the transition to a named account.

- 3.5 CGCs generally felt that stronger protections may be needed. They highlighted issues in the existing processes and emphasised the need for protections for vulnerable customers. They emphasised the need for increased efforts to contact the new occupant before the switch to SPAYG. As part of this, they argued for greater supplier requirements to assess vulnerability and improvements to dispute resolution.

Our Proposed Approach

- 3.6 Our proposed approach has sought to clarify the protections available in the current regulatory framework. This includes the continued provision of emergency credit and friendly credit to maintain continuity of supply out of hours, alongside the use of preloaded credit at the point of remote switch to SPAYG to reduce the risk of immediate self-disconnection. All existing consumer protections continue to apply to the home moves process.
- 3.7 Emergency credit is a fixed amount of credit made available to customers when their meter balance is low or depleted, enabling the continued access to energy supply. This credit is typically recovered at the customer's next top-up, taking into account their ability to pay in line with SLC 27.8 if there are affordability concerns.
- 3.8 Friendly credit provides a non-disconnection period during specified times: overnight on weekdays, and throughout weekends and public holidays. Where a meter reaches zero during these periods, supply continues automatically, with any usage recorded as debt and recovered at the next top-up. Suppliers are required to offer friendly credit and emergency credit to all domestic customers under SLC 27A.2. SLC 27A.8 also requires suppliers to provide adequate

information for the customer to quickly and easily understand their access to friendly credit and emergency credit.

- 3.9 We also expect suppliers to comply with existing requirements to identify and respond to instances of self-disconnection, in line with their obligations under SLC 27A and SLC 27.8. These protections are designed to ensure that appropriate support is provided, particularly where customers may be in vulnerable situations.
- 3.10 SLC 28.2 also requires suppliers to ensure that a pre-payment meter is “*safe and reasonably practicable*”. This means considering whether it is an appropriate and safe payment method for the household, taking account of factors such as health or supply dependence, ability to access/top up/use the meter, and practical and technical constraints. Once a customer has engaged, and if they remain on SPAYG, the supplier must continue to assess whether a PPM remains safe and reasonable for the customer.
- 3.11 Payment method alone does not create the risk of customer harm. Detriment arises where customers are unable to maintain access to essential energy services or where financial pressures lead to adverse outcomes, such as unmanaged debt, stress, or loss of supply. These risks exist across all payment methods, though they materialise in different ways.
- 3.12 Due to this policy interacting with unknown occupiers, we have no way to exclude vulnerable customers from experiencing this process. However, the above measures, alongside requirements regarding supplier’s approach to communicating with customers, will support customers to access the support they need.

Customer communication

Background

- 3.13 For the purposes of this policy, ‘customer communications’ means the information suppliers provide to customers at each stage of the home moves

process. This includes communications with outgoing occupiers, incoming occupiers, and communications addressed to “the occupier” when the supplier has not yet identified the new customer. These communications may include information about closing or opening an account, the basis on which energy is being supplied, any charges that may accrue, the payment method in place, how to top up where a meter is in prepayment mode, how to change tariff or payment method, and how to access support.

- 3.14 Clear and timely communication with customers is a key part of a successful home moves experience. They should help consumers understand their responsibilities, support early engagement with suppliers, help ensure customers can maintain access to energy and that appropriate protections are in place where needed.

Stakeholder Feedback

- 3.15 Stakeholders across all groups (CGCs and suppliers) highlighted the importance of clear, timely and accessible communications throughout the home moves process. Suppliers supported clear guidance on customer and supplier responsibilities, including how and when information should be provided to outgoing occupiers, incoming occupiers and accounts held in the name of ‘the occupier’.
- 3.16 CGCs placed particular emphasis on the need for communications to be easy to understand, available through non-digital channels and designed to support customers who may face barriers to engagement, including language needs, limited digital access or vulnerability.

Our Proposed Approach

- 3.17 Existing licence conditions set out supplier requirements when communicating with domestic customers. These requirements will apply throughout the home moves process, including where a supplier is communicating with an outgoing occupier, an incoming occupier, or an account held in the name of ‘the occupier’. These obligations are particularly important where a supplier has remotely

switched a smart meter to SPAYG, as the customer may need clear and timely information to understand the status of the account, how to access supply and support provisions (e.g. the Priority Services Register), how to top up, and how to contact the supplier. In the guidance we will set out examples of best practices for communication during the home moves process, rather than prescriptive rules.

- 3.18 SLC 0 requires suppliers to treat domestic customers fairly. This includes ensuring that information provided to consumers is complete, accurate, not misleading, in plain and intelligible language, and sufficient to enable customers to make informed choices. In the context of home moves, we expect suppliers to ensure that communications are clear about why the customer is receiving the communication, what action they may need to take, and what support is available if they are unable to access energy or are experiencing difficulty. These communications should also be accessible for the customer e.g. offering braille or large print formats.⁵
- 3.19 SLC 25 requires suppliers to ensure that the structure, terms and conditions of their tariffs are clear and easily comprehensible and SLC 7.7 requires that all reasonable steps must be taken to provide deemed contract customers with information on the terms of their contract and what other terms are available. It also requires suppliers to put in place information, services and/or tools to enable domestic customers to compare and select tariffs, taking account of the customer's characteristics and/or preferences. Where a new occupier contacts a supplier, we expect suppliers to provide clear information about the tariff that applies under the deemed contract, the availability of other tariffs or payment methods, and how the customer can move to a tariff or arrangement that better meets their needs.
- 3.20 SLC 31 requires suppliers to provide relevant billing information, including information that a domestic customer may need to understand and manage the

⁵ [Consumer Vulnerability Strategy | Ofgem](#)

costs associated with their tariff and the energy they consume. This applies to customers on both deemed and contracted tariffs. In the home moves process, this means suppliers should provide information that enables customers to understand any charges accruing at the property, how those charges will be calculated, how the customer can monitor their usage and balance, and how any credit or debt on the meter will be treated.

- 3.21 SLC 31G requires suppliers to provide assistance and advice to domestic customers. We expect suppliers to ensure that relevant information is made available in communications relating to the home moves process, including information on how to access help if the customer is struggling to pay, has self-disconnected, is at risk of self-disconnection, or may be in a vulnerable situation. Suppliers should also make clear how customers can contact them to discuss their circumstances, update account details, or request additional support.
- 3.22 Taken together, these existing obligations provide a framework for clear, timely and accessible communications during the home moves process. We consider that suppliers should proactively communicate with outgoing and incoming occupiers to support customers to understand their responsibilities and help ensure that customers can access appropriate support.
- 3.23 Given this, we are not proposing to introduce a new licence condition on communications at this stage. Instead, our proposed guidance will explain how we expect suppliers to apply the existing licence framework in this specific context.

Landlords and housing associations

Background

- 3.24 Landlords, letting agents and housing associations can play an important role in the home moves process. In rented and social housing, they may hold information about when a tenancy is ending, when a new occupier is expected to move in, and, in some cases, the contact details of the incoming tenant. This information

can help suppliers identify when a change of tenancy has taken place and support earlier engagement with the new occupier.

3.25 The majority (67%) of home moves in England, in 2024/25, involved someone moving in or out of privately rented accommodation.⁶ Private renters move more frequently than owner occupiers, and social housing providers also manage large numbers of tenancy changes, with 16% of home moves involving a move in or out of the social rented sector. This is compared to 40% of moves involved owner occupier housing. This means that the way landlords and housing associations manage move-in and move-out processes can have an important effect on how quickly occupiers understand their energy responsibilities and engage with suppliers.

3.26 At present, suppliers have limited ability to identify whether a property is privately rented, socially rented or owner occupied. Ofgem also does not have powers to require landlords, letting agents or housing associations to notify suppliers when a tenancy changes or provide tenant contact details. Sharing of personal information is also limited due to general data protection regulations and legislation. This limits the extent to which the energy regulatory framework alone can address all the causes of unnamed occupier accounts.

Stakeholder Feedback

3.27 Stakeholders highlighted the potential role of landlords, letting agents and housing associations in improving the home moves process. Some respondents noted that housing providers may already give tenants information about utilities as part of their onboarding process, including meter details or supplier information. Others suggested that more consistent information-sharing between housing providers and suppliers could help reduce delays in setting up accounts and limit the build-up of debt.

⁶ English Housing Survey 2024 to 2025 - [Chapter 3: Housing history and future housing - GOV.UK](#)

3.28 Stakeholders also identified practical challenges. Suppliers may not know whether a property is rented or socially rented, and housing providers may not have established routes for sharing information with energy suppliers. There may also be data protection, operational and system design considerations if information-sharing arrangements are expanded in future.

Our Proposed Approach

3.29 We recognise that landlords, letting agents and housing associations may be well placed to support earlier engagement between customers and suppliers during the home moves process. However, as the energy regulator, we cannot place specific requirements on housing providers through energy supply licence conditions. Our proposed guidance will therefore focus on the actions we expect suppliers to take within the existing regulatory framework.

3.30 We expect suppliers to consider how their communications can be tailored for different home moves routes, including rented and social housing. This may include clear information for occupiers who are moving into a property where the meter has been remotely switched to SPAYG, information that can be shared with housing providers where appropriate, and clear signposting on how incoming occupiers can set up an account, choose a tariff or payment method, and access support.

3.31 We also expect suppliers to consider whether engagement with landlords, letting agents, housing associations and representative bodies could support smoother implementation. This may include briefing housing providers on the process, encouraging them to signpost tenants to contact their energy supplier when moving in or out, and exploring whether supplier communications can be made available in formats that housing providers can use as part of tenancy onboarding.

3.32 Reforming the home moves process to provide greater clarity about who is occupying a property presents a significant opportunity to prevent avoidable energy debt from arising. We are engaging with government on further changes outside Ofgem's regulatory powers which will further improve the flow of

information between landlords, tenants, and suppliers; drawing on lessons from other sectors, such as landlord notification arrangements in the water sector⁷.

3.33 As set out in the energy debt circuit breaker, when parliamentary time allows DESNZ will legislate to reform the home moves process, placing a new obligation on non-resident owners (i.e. landlords) to provide timely and accurate information when tenants move into or out of a property. Where neither the tenant nor landlord has provided the necessary information, landlords will be jointly and severally liable for energy charges associated with the property, unless exempt. Improving information flows will help ensure accounts are established more quickly, billing is accurate, and consumers can be identified and supported at an earlier stage.

3.34 This reform will create a fairer balance of responsibilities between tenants and landlords, recognising the important role landlords can play in providing timely information about occupancy and tenancy changes that could help to reduce the amount of debt in the system. The reform may place similar obligations on landlords as exist with respect of water bills in Wales. To inform this work, we are seeking evidence to better understand all operational costs associated with current debt recovery arrangements, and the potential benefits that earlier notification of home moves, greater certainty over customer liability and improved ability to contact consumers could deliver.

Questions

- Q2. What are your views on our proposed approach to consumer protection?
- Q3. What are your views on our proposed approach to consumer communication?
- Q4. What are your views on our proposed approach to housing associations and landlords?
- Q5. Do you view that the draft guidance is clear and allows suppliers to implement this process successfully?

⁷ Expand

- Q6. Do you view that the 2-week “grace period” provides sufficient customer protections?
- Q7. How should the 2-week “grace period” be financed? Should this cost be put back on to the customer after they move into the property or is there an alternate financing option?
- Q8. What other customer protections may be useful to standardise within the guidance?
- Q9. If landlord notification arrangements were in place for energy (as already exist in water in Wales), and considering affordability remains a large reason for debt accumulation, how would this impact debt recovery?
- Q10. If landlord notification arrangements were in place for energy (as already exist in water in Wales), how much will this reduce ongoing yearly costs related to identifying whether a home move has taken place? Please include detail of associated administrative costs e.g. staff time, contact attempts, case handling, tracing and recovery, validation and field activity and account management.
- Q11. How much, if any, fixed costs would you anticipate incurring related to a supplementary intervention in the home moves process around the role of landlords? I.e. updating advice on websites for landlords / letting agents, signposting and reminders of when and where to provide details of a home move.
- Q12. If the status quo were maintained, do suppliers think debt recovery related costs will stay the same or increase? E.g. in time, and operational costs. If so, can suppliers quantify this?
- Q13. Noting that the absence of a timely notification materially increases both operational cost and bad debt risk, what proportion/percentage of home moves debt turns into bad debt?

4. Monitoring and Assurance Framework

This section covers the proposed monitoring and assurance framework contained within the Guidance. It proposes a proportionate mechanism for ensuring compliance and protecting consumers.

Key proposed principles

4.1 We propose to pursue a monitoring and assurance framework that is proportional to the needs laid out in the home moves guidance. This means we are seeking ways to protect consumers that are not overly burdensome to suppliers.

4.2 This framework must enable Ofgem to:

- Ascertain the suitability of the guidance document in protecting consumers;
- Understand the effectiveness of the outcomes we expect for consumers through the home moves process; and
- Support the investability of the energy market by assessing the effectiveness of the guidance in reducing future debt and arrears.

4.3 As suppliers are not required to follow the home moves process laid out in the guidance, our monitoring framework will seek to measure customer outcomes and impacts rather than complete adherence to the process.

Overview of the proposed oversight process

4.4 We propose to break down the monitoring and assurance process into 3 key segments:

1. Activity monitoring: Will seek to understand how sufficient the principles are in the guidance for ensuring customer protections and early engagement with suppliers. Data that we gain through this process may be used to improve the guidance document.

2. Impact monitoring: To measure and understand the outcomes for customers and impacts on suppliers. Information gathered through this arm will inform our wider debt strategy and Markets vision.
 3. Compliance monitoring: Monitoring supplier adherence to existing SLCs. Compliance includes, but is not limited to, providing requested data in a timely manner and providing customers clear and accurate communications.
- 4.5 We do not view that a regular and designated audit period is proportionate to the needs of the guidance, though suppliers should retain evidence as we reserve the right to initiate audits where we have concerns about the application of this guidance.
- 4.6 Table 1 - An overview of the activity and impact monitoring approach, lays out how and when we will request activity and impact monitoring information. This is expanded upon in the draft guidance.

Table 1 - An overview of the activity and impact monitoring approach

Activity	Impact
Data collection requests (DCRs) (previously known as Requests for Information) at 3 monthly intervals from when the consultation response is published.	A DCR will also be used to assess the impacts of the home moves process and sufficient time will be provided to enable suppliers to respond in full.
Suppliers will be provided with a reporting template as part of the DCR and asked to respond within a defined time period.	This DCR will detail the impact related questions, and we may request qualitative information as part of this (e.g. case studies from specific customers).
	We will provide suppliers sufficient time to answer these in full.

Questions

Q14. Do you agree with the proposed mechanisms for monitoring the progress of the home moves process? If not, what is your alternative suggested approach.

5. Assessment of Impacts

This chapter provides an assessment of the potential impacts of Ofgem's proposed guidance on the supplier home moves.

Purpose and scope

- 5.1 This chapter provides an assessment of the potential impacts of Ofgem's proposed guidance on the supplier home moves process. It is intended to support stakeholders in understanding the expected consumer and supplier impacts as well as to set out the limits of our current evidence base and uncertainties associated with the proposed intervention.
- 5.2 The assessment considers impacts on domestic consumers, including consumers in vulnerable situations, as well as licensed energy suppliers. It also considers wider market impacts arising from changes in supplier and consumer behaviour resulting from the proposed home moves process.
- 5.3 This chapter is not presented as a full Regulatory Impact Assessment. Instead, it provides a qualitative and quantitative assessment of the expected impacts of the proposal, supported by indicative quantitative analysis where relevant evidence is available. The quantitative analysis is intended to illustrate the potential scale of impacts and identify the assumptions made in our analysis that are most likely to influence the outcome.
- 5.4 Suppliers already have the ability under the existing regulatory framework to operate home moves processes involving remote switching to SPAYG. However, evidence gathered through the Call for Input and subsequent stakeholder engagement, suggests that supplier adoption remains limited and approaches vary across the market and further identified uncertainty regarding customer protections. The proposed guidance seeks to reduce this uncertainty by providing a route to delivering a home moves process that protects customers and adheres to existing regulatory requirements. The impacts assessed in this chapter therefore arise from the potential for increased supplier confidence, wider

adoption and more consistent implementation of processes that suppliers can already operate under the existing framework.

- 5.5 In developing this proposal, a spectrum of approaches was considered, ranging from maintaining the current position without further intervention, through non-statutory guidance clarifying existing requirements, to the creation of new licence obligations. We consider guidance to be a proportionate approach at this stage because it provides additional regulatory clarity and promotes consistency while preserving supplier flexibility and avoiding the need for new licence obligations while the evidence base continues to develop.

Evidence and limitations

- 5.6 This assessment draws on evidence gathered through our 2025 Call for Input, the published summary of responses, stakeholder working groups, official statistics relating to household moves, smart meters, and energy debt, and confidential, commercially sensitive, operational evidence provided by a small number of suppliers who have been trialling similar home move processes.
- 5.7 While the supplier evidence provides a useful calibration point for understanding potential impacts, it may not be representative of all suppliers. Those suppliers trialling this approach have started relatively recently, and so the outcomes may not represent what we see in a fully mature, market wide, process. Impacts may vary depending on factors such as supplier size, customer demographics, meter portfolios, levels of smart meter penetration, consumer awareness, and existing home move processes.
- 5.8 The market-wide estimates presented in this annex are therefore illustrative extrapolations rather than observed market totals, giving a rough order of magnitude of impacts. The quantitative analysis should be interpreted as an indication of the potential scale of impacts under a low, central and high set of assumptions, rather than a forecast of future outcomes.
- 5.9 The principal drivers of the modelled outcomes are the estimated number of successful Change of Mode (COM) processes and the assumed level of debt

accumulation avoided per successful COM. The number of successful COMs is influenced by assumptions regarding the proportion of home moves for which suppliers are notified in advance, the proportion of eligible cases where suppliers attempt a COM, and the probability that an attempted COM is completed successfully. The estimated debt accumulation avoided per successful COM is also a material driver of the monetised results and is subject to uncertainty, as it is based on a limited number of supplier estimates prepared using different methodologies. By comparison, assumptions relating to annual home move volumes and smart meter prevalence are derived from established data sources and contribute a lower degree of uncertainty to the overall results.

Dynamic baseline and counterfactual

- 5.10 The baseline for this assessment is dynamic rather than static. Some suppliers already operate, pilot, or are developing approaches that share features with the proposed guidance and may continue – or begin – to do so, even in the absence of Ofgem intervention, subject to existing regulatory obligations and licence conditions.
- 5.11 The relevant comparison is therefore not between the proposed guidance and a market in which no action is taken, but between the proposed guidance and a mixed and evolving market position in which supplier approaches to home moves events vary in design, scope and implementation.
- 5.12 The relevant counterfactual is the current, mixed market position in which a small number of suppliers operate or are developing processes with similar features, while approaches across the wider market remain variable. Some of the modelled impacts may therefore arise without the proposed guidance. However, stakeholder engagement suggests adoption has so far been limited and that greater regulatory clarity could increase supplier confidence in implementing comparable processes. The assessment therefore focuses on the potential impacts associated with implementation of the proposed approach rather than attempting to isolate the incremental effect of the guidance itself.

5.13 As adoption is voluntary, implementation may not occur uniformly across the market, and individual suppliers may reach different conclusions regarding the expected costs and benefits of the process.

Scale of the issue and modelled population

5.14 Ofgem's debt and arrears indicators reported total domestic consumer debt and arrears of approximately £4.79 billion in Q1 2026. Responses to the Call for Input included supplier evidence indicating that debt associated with unnamed occupier accounts following a home move may represent a material proportion of overall debt and arrears. These figures are presented as contextual evidence regarding the potential scale of the issue and should not be interpreted as an estimate of the debt that would be avoided under the proposed guidance.

5.15 Not all home moves are within scope of the proposed home moves process. Specifically, in the assessment, the impacts of the proposed process will only apply in scenarios where:

- a supplier has been notified of a change of occupancy in a property in advance of the outgoing customer's departure; and
- the property is served by a smart meter that is not already operating in prepayment mode (as those in prepayment mode would remain so).

5.16 Our analysis therefore applies assumptions regarding the number of home moves per year and smart meter prevalence across GB to estimate the proportion of home moves that may be affected by the proposed process.

5.17 The English Housing Survey (EHS) estimates that approximately 1.8 million households in England moved home in 2024-25. As directly comparable estimates for Scotland and Wales are not published on the same basis, a GB-wide home move estimate was derived by applying the England home move rate to the estimated household populations of Scotland and Wales. This produces an indicative and rounded estimate of approximately 2.1 million home moves across GB each year.

- 5.18 Based on limited data received from suppliers, we estimate that suppliers are notified of around 65% of home moves in advance of a customer vacating the property, and therefore, in 65% of cases, the supplier would be able to perform a change of mode (COM) on the meter(s) at the property provided they have smart functionality.
- 5.19 Currently around 72% of meters in GB are smart meters. Of these, around 11% already operate in prepayment mode. Therefore, we estimate 64% of meters in the country could be eligible for the new home moves process.
- 5.20 Given the above, we estimate around 42% (0.9m) home moves each year could be affected by the new proposed home moves process. The resulting modelled population should be regarded as illustrative rather than definitive. It is intended to provide an indication of the potential scale of impacts under a set of assumptions and does not represent an estimate of the number of cases that will participate in the process in practice.

Impacts on consumers

- 5.21 The proposed process may enable suppliers to identify support needs at an earlier stage, including whether a customer may be in a vulnerable situation or require additional assistance. Where customers engage with their supplier sooner, suppliers may also be able to assess whether continued use of SPAYG is safe and reasonably practicable and provide appropriate support where required. The process may therefore accelerate access to support for consumers who would otherwise remain unknown to the supplier for an extended period.
- 5.22 Earlier engagement also creates an opportunity for suppliers to discuss consumer needs including vulnerabilities, available tariffs, payment methods and account options sooner than would otherwise occur. This may help consumers select arrangements that are more appropriate for their circumstances and provide greater visibility of the options available to them.
- 5.23 Earlier engagement may also reduce the likelihood of consumers receiving large unexpected or retrospective bills after moving into a property. Based on supplier

evidence, the current average time for an unnamed occupier to make first contact with their supplier is approximately 90 days. During this period, energy may continue to be consumed before an account is fully established and appropriate payment arrangements are agreed. By comparison, supplier evidence from an existing home move process reported average customer engagement within approximately two weeks. Earlier engagement could therefore reduce the likelihood of an incoming occupier receiving a large retrospective bill after consuming energy for an extended period without understanding their account status or responsibilities.

- 5.24 Earlier account establishment may also improve the accuracy of move-in dates, meter readings and customer records. This could reduce disputes regarding responsibility for energy consumption and charges incurred before a customer became responsible for the property. More consistent implementation of home moves processes across suppliers may also help consumers better understand what to expect when moving into a property and how to engage with suppliers following a move.
- 5.25 Over time, earlier account establishment and payment arrangements may reduce the accumulation of debt and arrears associated with home moves events. To the extent that this reduces suppliers' debt-related costs, including debt administration and working capital requirements, consumers may benefit through lower Debt-Related Costs (DRC) allowances within the retail price cap and reduced debt-related costs across the wider market, leading to lower tariff offerings both on the price cap and on fixed-term contracts. Debt reduction should therefore be viewed as one of the mechanisms through which wider consumer benefits may arise, rather than as a consumer benefit in itself.
- 5.26 The impacts described above are interconnected and arise through a common causal pathway. Earlier engagement between incoming occupiers and suppliers is the principal mechanism through which a range of outcomes may be realised, including earlier identification of customer circumstances, improved access to support, more accurate account information and earlier establishment of payment arrangements. The benefits described above should therefore not be

interpreted as separate or additive impacts, but as related outcomes that may arise from earlier customer engagement.

- 5.27 The proposed process may also create consumer costs. Incoming occupiers will need to recognise the need to contact a supplier, navigate a contact route and, while the meter remains in SPAYG mode, understand how to monitor credit levels and top up where necessary. While this is already the expectation placed on consumers, and may represent a minor inconvenience for many consumers, it could be materially more challenging for some groups protected under the Equality Act 2010 and for consumers in vulnerable situations. A more detailed assessment of these impacts is set out in the accompanying Public Sector Equality Duty (PSED) assessment.
- 5.28 There is also a risk that some incoming occupiers may not receive, or may not recognise, communications informing them that the meter has been remotely switched into SPAYG mode. In such cases, consumers may not know who their supplier is, be unaware of the need to engage with a supplier, or be unable to manage their SPAYG balance, increasing the risk of self-disconnection once any initial credit provided by the supplier has been exhausted. The consequences of self-disconnection may be particularly severe for vulnerable consumers and those with higher energy needs.
- 5.29 Existing protections available to SPAYG customers, including emergency credit and friendly-hours credit, may reduce the likelihood and duration of supply interruptions where customers are aware of, and able to access, those protections. However, a key risk associated with the proposed process is that some incoming occupiers may not realise that the meter has been remotely switched into SPAYG mode, may not know who their supplier is, or may be unaware of the support and credit arrangements available to them. In such circumstances, consumers may be unable to access support in a timely manner, increasing the risk of temporary loss of supply until contact is made with a supplier and supply is restored.

- 5.30 Evidence from an early supplier trial suggests that fewer than 5% of successful meter mode changes resulted in any self-disconnection. However, the estimate is based on a relatively small sample and should therefore be treated with low confidence. While the likelihood of this outcome may be limited, the consequences in individual cases could be significant and may affect consumers' health, safety and ability to use essential energy services within the home if they are unable to contact a supplier soon after self-disconnection.
- 5.31 Several features of the proposed approach are intended to reduce this risk. These include the provision of pre-applied credit when a meter is remotely switched, continued access to emergency credit and friendly-hours credit, expectations regarding customer communications, and existing supplier obligations relating to vulnerability, self-disconnection and customer support. These mitigations are expected to reduce both the likelihood and duration of any loss of supply where customers engage with the supplier or become aware of the support available to them.

Impacts on suppliers

- 5.32 Suppliers may benefit from a reduction in the duration of unnamed occupier accounts, enabling earlier payment, earlier identification of the responsible bill payer and earlier establishment of ongoing payment arrangements. This would reduce debt accumulation during the home move period, improve the quality of customer information held by suppliers and reduce the need for tracing activity, retrospective billing and disputes regarding responsibility for energy consumption.
- 5.33 The revised home moves process could also reduce suppliers' debt-related costs over time. Earlier engagement and account establishment may reduce the accumulation of debt and arrears associated with home moves events. A reduction in debt accumulation does not necessarily translate directly into an equivalent reduction in supplier losses, as some debt may ultimately be recovered. However, lower debt accumulation may reduce debt administration costs by reducing the number of accounts requiring tracing, debt management

and recovery activity. Suppliers may also benefit from lower working capital requirements associated with financing unpaid consumption and lower bad debt provisions where debt accumulates at a lower rate than under existing arrangements.

- 5.34 Suppliers are also expected to incur implementation costs in order to establish and operate the revised process. These may include systems development, process design, staff training, customer communications and operational changes required to support meter mode changes, temporary tariffs and account management processes. Based on limited supplier evidence, the illustrative quantitative analysis assumes a one-off implementation cost of approximately £58k per supplier. Actual costs are likely to vary depending on supplier size, existing system capability and the degree of process automation already in place.
- 5.35 Recurring costs may arise from increased customer contact, monitoring and reporting activities, complaint handling, provision of initial credit and any standing charge revenue foregone during periods where a temporary zero-standing-charge arrangement is applied. Based on the indicative modelling undertaken for this assessment, annual recurring costs could range from approximately £158k to £231k, depending on assumptions regarding the size of the eligible population, customer engagement rates and the duration of the temporary arrangements. However, these costs should be considered alongside the potential reduction in bad debt exposure, debt administration costs and working capital requirements associated with earlier customer engagement. The overall financial impact on suppliers will depend on the balance between these costs and the extent to which the revised process reduces debt accumulation and improves debt recovery outcomes.
- 5.36 The quantified recurring cost estimates included in the illustrative analysis are limited to those cost categories for which supplier evidence was available, including administrative processing costs and assumptions relating to credit exposure where pre-applied credit is exhausted. The estimates should not be interpreted as a comprehensive assessment of all supplier costs. Suppliers may incur additional costs associated with staff training, customer support, complaint

handling, process maintenance and other operational activities. Evidence on these costs was either not available or was insufficiently robust to support quantification within the illustrative analysis.

5.37 It should also be noted that the proposed guidance would not require suppliers to implement the revised home moves process. The guidance is intended to clarify how suppliers may operate such arrangements within the existing regulatory framework. Suppliers would therefore remain responsible for determining whether implementation is commercially and operationally viable, taking account of the expected costs and benefits for their own customer base, meter portfolio and systems.

5.38 The scale of supplier impacts is expected to vary across the market. Suppliers with larger smart meter portfolios may experience a greater number of eligible home moves events and therefore larger absolute costs and benefits. Conversely, smaller suppliers may face proportionally higher implementation costs per case due to lower customer volumes. The overall impact for individual suppliers will depend on their customer base, smart meter penetration, existing home move processes and the extent to which the revised process reduces debt accumulation and debt management activity.

5.39 Confidence in the direction of supplier impacts is relatively high, as the proposed process is expected to create both implementation costs and opportunities to reduce debt-related costs. However, the scale of these impacts remains uncertain and is sensitive to supplier uptake, customer engagement rates, the proportion of eligible Change of Tenancy events, and the extent to which the revised process reduces the duration of unnamed occupier accounts and associated debt accumulation.

Illustrative monetised analysis

5.40 We have undertaken illustrative quantitative analysis to indicate the potential scale of impacts associated with suppliers operating the proposed home moves process. The analysis combines official data on annual home moves and smart-

meter prevalence with confidential operational evidence provided by a small number of suppliers currently operating comparable processes. Because supplier processes, meter portfolios and reporting definitions may differ, the results should be treated as scenario estimates rather than forecasts.

- 5.41 The analysis first estimates the annual number of home moves that may fall within the technical scope of the process. The central scenario assumes that suppliers are notified in advance of 65% of home moves, that 72% of meters are smart and that 89% of smart meters are not already operating in prepayment mode. Taken together, these assumptions imply that approximately 42%, or 0.9 million, annual home moves may fall within the initial eligible population.
- 5.42 The number of successful Change of Mode (COM) processes will be lower than the eligible population because not every eligible meter will enter the process and not every attempted mode change will be technically successful. The scenarios therefore vary in the proportion of eligible cases entering the process and the successful mode-change rate. We have estimated three scenarios based on differing numbers of COM-eligible home moves per year (i.e. those where the supplier is notified in advance and the property has a smart meter), COM attempts by suppliers, successful COMs, and customer engagement rates post-COM. They do not include subsequent reattempts, which means the estimated successful volumes may understate final success where suppliers retry initially unsuccessful cases.
- 5.43 An illustrative debt accumulation value per successful COM (£814) has been applied to estimate the potential scale of debt that may not arise under the revised process. This value is informed by a limited number of supplier estimates prepared using different methodologies and is therefore held constant across scenarios solely to isolate the effect of changes in process volumes. The resulting estimates should not be understood as realised financial savings or as impacts attributable solely to the proposed guidance.
- 5.44 Some debt that would otherwise accumulate may subsequently be recovered under existing arrangements through retrospective billing, debt collection or

repayment plans. However, reducing the duration and value of outstanding debt may still generate economic benefits where debt is ultimately recovered, because suppliers would finance unpaid consumption for a shorter period and may incur lower tracing, administration and working-capital costs.

5.45 The analysis also estimates direct set up costs (£58k), administration costs (£0.06 per COM), potential unrecovered initial credit and, where applicable, standing-charge revenue forgone under a temporary zero-standing-charge arrangement. Supplier evidence indicates that initial credit (assumed at £30 based on current industry practise), is generally intended to be recovered once the responsible customer is identified. The model therefore treats the full credit applied as exposure rather than cost and applies a separate sensitivity assumption to the proportion of exhausted credit that may ultimately remain unrecovered. Our model estimates a potential avoided debt range of £84m-493m per year at an annual recurring cost of £158k in the low-COM-rate scenario, £269k in the mid-COM-rate scenario, and £231k in the high-COM-rate scenario. The costs are lower in the high-COM-rate scenario than the mid-COM-rate scenario due to the higher assumed COM success rate and smaller proportion of COMs assumed to be applied to vacant properties (where the credit applied to the meter by the supplier is not repaid).

5.46 Supplier evidence suggests that approximately 4%-16% of successful COMs may exhaust the initial credit balance before a subsequent move-in is completed or contact is made with the supplier by the new occupier. This should not be interpreted as an equivalent rate of occupied household self-disconnection, as a material proportion of observed exhausted-credit cases may relate to vacant properties. Credit consumed in a vacant property is not necessarily unrecoverable, although the administrative cost of identifying the liable party and pursuing a relatively small balance may exceed the amount recovered.

5.47 The estimates represent the gross effects associated with operating the modelled process. They do not isolate the incremental impact of the guidance. Some suppliers already operate or are developing comparable processes and some impacts may therefore arise under the baseline. However, stakeholder

engagement suggests that adoption remains limited and that further regulatory clarity may increase supplier confidence in operating such arrangements.

5.48 Given these limitations, the results are best interpreted as indicators of the scale of the addressable population, potential changes in debt accumulation and direct process costs. They are not estimates of net financial benefits attributable to the guidance. The full range of estimates produced can be found in the table below. In the low-COM-rate estimate we assume the value of each variable which would produce the fewest successful COMs and highest administrative costs per successful COM each year, i.e. the fewest eligible home moves, lowest COM success rate, and lowest customer engagement rate. In the high-COM-rate scenario we assume the opposite end of these variables' estimates, and in the mid-COM-rate scenario we assume a mid-point of each variable between its high and low estimates.

Table 2: Estimated annual costs and benefits of proposed home moves process⁸

Variable	Low-COM-rate	Mid-COM-rate	High-COM-rate
Home moves per year in GB	2.1m	2.1m	2.1m
Potential eligible home moves per year	740k	874k	1m
Successful COMs	104k	297k	605k
Potential avoided debt	£84m	£242m	£493m
Cases with exhausted credit	17k	30k	23k
Potential unrecovered credit	£254k	449k	340k
Recurring costs	£158k	£269k	£231k
Recurring costs per successful COM	£1.50	£0.90	£0.40

⁸ Note that figures have been rounded, and sub-totals may not add up to their respective totals.

Evaluation and Monitoring

Process and impact evaluation

5.49 Ofgem will monitor the implementation and effectiveness of the revised Home moves process to assess whether it is achieving its intended objectives of promoting earlier customer engagement, reducing the prevalence and duration of occupier accounts, and limiting the accumulation of debt and arrears in the retail energy market. Monitoring may include both process and impact evaluation activities.

5.50 A process evaluation would aim to answer questions regarding the Home moves design and implementation, and would covers areas such as:

- How have suppliers implemented the guidance?
- Has the guidance improved consistency across the market?
- What implementation challenges have emerged?
- Are further changes to the guidance required?

5.51 An impact evaluation would aim to quantify the extent to which the Home moves process has achieved its key objectives and identify any unintended consequences. Key areas we would assess include:

- What reduction has been achieved in occupier accounts?
- Has the average duration of occupier accounts reduced?
- Has debt accumulation reduced?
- Are customers engaging earlier?
- Have there been any unintended consequences?

- What costs have suppliers incurred?

Competition Assessment

5.52 Ofgem's competition framework considers the impact of policy interventions on customer engagement and empowerment, market rivalry, and market structure.

5.53 The revised home moves process is intended to promote earlier engagement between consumers and suppliers, reduce the prevalence of occupier accounts and improve the accuracy of customer information held by suppliers. Earlier engagement may improve consumer awareness of available payment methods, tariff options and supplier offerings at an earlier stage in the home move process. While the primary objective of the policy is not to increase switching, earlier engagement may support more informed consumer decision-making and strengthen customer participation in the retail energy market.

5.54 The revised process is not expected to create a significant barrier to competition. Many suppliers already operate elements of the proposed process, and the publication of guidance is intended to support a more consistent approach across the market. However, implementation costs may vary between suppliers depending on existing systems, processes and levels of automation.

5.55 Ofgem will continue to monitor the implementation of the revised process and consider any evidence of unintended impacts on competition, customer engagement or supplier behaviour that emerge over time.

Public Sector Equality Duty

5.56 Ofgem has a legal duty to consider the impact of our policies on people with protected characteristics under the Public Sector Equality Duty (PSED). The main objectives of the PSED are to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010.

- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

5.57 Our assessment is that the main objective of this policy (Ofgem's vulnerability duty) overlaps with the PSED for the following portrayed characteristics: age and disability. Our assessment of benefits identifies the impact of our policy in these groups, and it therefore covers our requirement to undertake an Equalities Impact Assessment.

5.58 For other protected characteristics such as religion, sexual orientation and gender reassignment, we have not identified any potential for discrimination or adverse impacts. Some of the distributional impacts on these groups are included implicitly.

Initial Equality Assessment

5.59 This assessment represents Ofgem's initial consideration of the potential equality impacts of the proposed Change of Tenancy (CoT) arrangements. In developing the policy, we have considered how different groups of consumers may experience both the benefits and risks of the proposals, particularly where there may be barriers to engaging with suppliers during a home move. We recognise that evidence on the distributional impacts of the policy remains limited at this stage and will continue to monitor implementation, stakeholder feedback and emerging data including any evidence of differential impacts on consumers with protected characteristics.

5.60 Overall, we expect the proposals to benefit consumers through earlier engagement, reduced debt accumulation and clearer account set-up arrangements. However, some consumers may experience disproportionate impacts from the requirement to engage with suppliers promptly following a move, particularly where there are communication, accessibility, health, financial or vulnerability-related barriers. At this stage, we consider the greatest potential

for differential impacts to be on consumers with disabilities, older consumers, consumers with limited English proficiency, and consumers experiencing circumstances that may reduce their ability to engage during a home move. Table 4 below sets out our initial assessment of impacts by protected characteristic, alongside relevant mitigations.

Table 4.

Characteristic	Impact	Key issue	Mitigation
Disability	Potentially disproportionate negative impact	Some disabled consumers may face greater challenges engaging with suppliers promptly following a move, understanding communications, or managing a meter operating in prepayment mode. This may increase the risk of poorer outcomes, including self-disconnection where engagement is delayed.	Accessible communications, reasonable adjustments, support credit and vulnerability identification processes.
Age (older)	Potentially disproportionate negative impact	Some older consumers may face barriers to engaging promptly with suppliers during a home move, particularly where they require additional support, rely on third-party assistance, or are less familiar with changes to metering and payment arrangements.	Clear communications through multiple channels and proactive supplier support.
Age (younger)	Mixed	Younger consumers are overrepresented in the private rented sector and move home more frequently than other groups. As a result, they are more likely to experience both the benefits and risks of the proposed home moves process. Earlier engagement and reduced debt accumulation may provide disproportionate benefits for this group, although some consumers may face challenges engaging during a move.	Clear move-in information and guidance intended to promote greater consistency in supplier home moves processes.

Characteristic	Impact	Key issue	Mitigation
Sex	Potentially disproportionate negative impact for some consumers	Some consumers may be more likely to experience financial vulnerability, including certain household types that are disproportionately represented by women. As a result, any difficulties engaging with suppliers during a home move may have a greater financial impact on these consumers.	Earlier customer engagement and clearer information on billing, payment arrangements and support available to customers experiencing financial difficulty
Race/ethnicity	Potentially disproportionate negative impact	Some ethnic minority groups are disproportionately represented in the private rented sector and may therefore be more likely to experience change of tenancy events. Consumers with limited English proficiency may also face additional challenges understanding supplier communications and information relating to account set-up, payment arrangements and supplier contact requirements. This may increase the risk of poorer outcomes where processes are not clear or accessible.	Guidance encouraging suppliers to provide clear and accessible home moves communications.
Pregnancy/ maternity	Potentially disproportionate negative impact	Consumers who are pregnant or have recently given birth may face additional practical and administrative pressures during a home move which could make engaging promptly with suppliers more difficult. Delayed engagement could increase the risk of confusion regarding payment arrangements or interruptions to supply, meaning any negative outcomes associated with the home moves process may have a greater impact during this period.	Guidance encouraging suppliers to provide clear move-in communications and early customer support.
Religion/belief	Neutral	No evidence that COT processes, debt treatment or supplier practices disproportionately affect consumers	N/a

Characteristic	Impact	Key issue	Mitigation
		based on religion or belief. Potential indirect impacts (e.g. communication preferences or trust in institutions) are expected to be limited.	
Sexual Orientation	Neutral	No evidence that sexual orientation directly affects exposure to risks associated with change of tenancy, including debt attribution or supplier engagement.	N/a
Gender Reassignment	Neutral	No specific evidence of differential impact, however some individuals may experience barriers in engaging with services due to wider vulnerabilities or mistrust. These are not specific to COT processes.	N/a

Key mitigations

5.61 To mitigate the potential impacts identified above, the proposed arrangements include:

- Publication of home moves guidance and best practice expectations for suppliers.
- Improved consumer communications, including expectations at move-in

6. Conclusions and next steps

- 6.1 We welcome any written feedback on this consultation by 9 December 2026 sent to debtstrategy@ofgem.gov.uk. Please include detail and supporting evidence in your comments wherever possible. We will carefully consider stakeholder feedback following the close of this consultation.
- 6.2 Our aim is to publish a decision enabling changes to the home moves process in Spring 2027.

Send us your feedback

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this consultation. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Do you have any further comments?

Please send your feedback to stakeholders@ofgem.gov.uk.

Appendix 1. List of Consultation Questions

Questions

- Q1. What incentives or offers do you provide to retain customers who inform you that they are moving house?
- Q2. What are your views on our proposed approach to consumer protection?
- Q3. What are your views on our proposed approach to consumer communication?
- Q4. What are your views on our proposed approach to housing associations and landlords?
- Q5. Do you view that the draft guidance is clear and allows suppliers to implement this process successfully?
- Q6. Do you view that the 2-week “grace period” provides sufficient customer protections?
- Q7. How should the 2-week “grace period” be financed? Should this cost be put back on to the customer after they move into the property or is there an alternate financing option?
- Q8. What other customer protections may be useful to standardise within the guidance?
- Q9. If landlord notification arrangements were in place for energy (as already exist in water in Wales), and considering affordability remains a large reason for debt accumulation, how would this impact debt recovery?
- Q10. If landlord notification arrangements were in place for energy (as already exist in water in Wales), how much will this reduce ongoing yearly costs related to identifying whether a home move has taken place? Please include detail of associated administrative costs e.g. staff time, contact attempts, case handling, tracing and recovery, validation and field activity and account management.
- Q11. How much, if any, fixed costs would you anticipate incurring related to a supplementary intervention in the home moves process around the role of

landlords? I.e. updating advice on websites for landlords / letting agents, signposting and reminders of when and where to provide details of a home move.

- Q12. If the status quo were maintained, do suppliers think debt recovery related costs will stay the same or increase? E.g. in time, and operational costs. If so, can suppliers quantify this?
- Q13. Noting that the absence of a timely notification materially increases both operational cost and bad debt risk, what proportion/percentage of home moves debt turns into bad debt?
- Q14. Do you agree with the proposed mechanisms for monitoring the progress of the home moves process? If not, what is your alternative suggested approach.

Appendix 2. Privacy policy

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

Department for Energy Security and Net Zero

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for one year after the project has closed

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system.

10. More information For more information on how Ofgem processes your data, click on the link to our “[Ofgem privacy promise](#)”.