



MAT response to the Ofgem proposed amendments to gas and electricity supply licence conditions in relation to the disconnection of vulnerable customers consultation

1 About the Money Advice Trust

The Money Advice Trust (MAT) is a charity formed in 1991 to increase the quality and availability of money advice in the UK. We work with the UK's leading money advice agencies, government and the private sector to increase the availability of money advice, improve its quality, and enhance the efficiency and effectiveness of its delivery.

MAT's vision is to reduce levels of unmanageable debt by:

- Ensuring high-quality money advice through training and support for advisers
- Collecting and disseminating information on debt, credit and the money advice sector
- Improving efficiency and effectiveness within the money advice sector via research and policy work
- Providing advice via National Debtline and Business Debtline
- Raising funds for the sector.

2 Introductory Money Advice Trust comment

We are grateful to the Ofgem for providing the Money Advice Trust (MAT) with the opportunity to comment on its informal consultation on the *proposed amendments to gas and electricity supply licence conditions in relation to the disconnection of vulnerable customers*.

3 Truncated timescale to respond to this consultation

This response departs from MAT's usual practice in relation to responding to consultations, which involves soliciting the views of our partners in the free-to-client money advice sector and collating these comments prior to submitting an integrated sector-wide response. Given the short timescale attached to the current paper, we are submitting a 'unilateral' response, i.e. one that represents our own views alone.

4 Comments on individual issues

4.1 Reasonable steps to identify the status of customers before disconnecting

We consider the revised wording for standard licence condition 27 to be a good clarification of 27.10 and 27.11. Whilst there is an implicit understanding of what taking '*reasonable steps*' might consist of, presenting this as an addition to the existing wording reinforces the needs to verify the domestic customer's status before disconnection takes place. By making attempts to check the household circumstances, this may help to promote dialogue and avoid any further action being taken, along with wrongful disconnections.

4.2 Reconnection of vulnerable customers before winter

We welcome this point being made clearer and think this compliments the ERA Safety Net measures in place for signatories. This measure may also reinforce the proposed changes to the licence condition number 27 outlined in the paper, as wrongful disconnections would be further reduced if the supplier had the added duty of reconnection before winter for vulnerable customers.

4.3 Consolidation of Standard Licence Conditions 27.10 and 27.11

We would welcome the consolidation of the two standard licence conditions stated above as there would be clearer protection for the groups of vulnerable clients that are currently separately covered in both paragraphs, and a better level of protection for clients groups currently covered by standard licence condition 27.11.