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Ofgem  
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26 August 2010

Dear Liz

**Notice of proposed modifications in relation to the disconnection of vulnerable customers**

Many thanks for providing us with the opportunity to comment on the proposed modifications to gas and electricity supply licence conditions in relation to the disconnection of vulnerable customers.

Previously, Citizens Advice responded to Ofgem's informal consultation issued on 26 March 2010 which sought views on proposals to amend SLC 27.10 and SLC 27.11 to make it clearer that suppliers are obliged to take all reasonable steps to ascertain the status of a customer and the occupants of any affected domestic premises before disconnection.

We remain supportive of these proposals. In our opinion they should help to make clear that energy suppliers must be proactive and take all reasonable steps to ascertain the circumstances pertaining to both the customer and other occupants of any domestic premises before taking steps to disconnection their electricity or gas supplies.

In Ofgem's previous consultation it helpfully provided details of the sort of proactive steps that it would generally expect suppliers to follow in attempting to determine whether someone in a property that might be subject to disconnection is vulnerable. In our opinion, these steps seem to cover the type of actions which we would expect suppliers to undertake. We are interested in learning Ofgem's view on the status of this guidance and whether it remains an accurate summary of the types of actions that suppliers should take, and be able to evidence.

In our previous submission we pointed out that in circumstances where suppliers have made every effort to ensure that no vulnerable customer is present but this is in fact the case, then:

- clear information should be provided to customers about their rights to be re-connected if they are vulnerable;
- any re-connection fees should be waived; and
- re-connection should occur within 24 hours of the supplier being made aware of this information.

We reiterate these comments and would welcome confirmation from Ofgem that these are actions which they would expect suppliers to comply with.

Finally, we note that Ofgem is currently looking further at the issue of reconnection of vulnerable customers before Winter. We would hope that any consideration could be concluded swiftly in order to allow sufficient time for any proposed licence changes to be brought into effect before Winter 2010-11 begins.

I hope that you find these comments helpful..

Yours sincerely

Tony Herbert  
Social Policy Officer