

18 October 2012

Dora Ianora
Ofgem
9 Millbank
London, SW1P 3GE

Dear Dora,

Consumer Focus agrees with and supports the intentions of MAP CP 130.

The inefficiencies associated with the previous process, whereby large pots of unallocated funds were able to build up, has been a long standing problem. Whilst we are pleased that processes have been put in place to prevent the future build up of such large sums, it is unfortunate it has taken until recently for industry to address this issue. We also seek further assurances that all steps possible have been taken to improve existing processes.

Consumer Focus has written to the suppliers with the largest number of prepayment meter customers with a request. If MAP CP 130 is adopted, we have asked them to use the existing money held to provide support to their most vulnerable consumers by contributing the funds to their trust fund or other hardship fund.

Going forward, smart metering will enable real-time validation of the customer's payment against supplier information, thereby removing the likelihood of payments being attributed to the wrong supplier or not allocated to any supplier. We welcome this. However we are aware that there is a risk that new solutions could increase the likelihood of customers being left off supply. In today's world if the customer takes the wrong payment device to their vending outlet, the top-up can often still be made and customers still have access to energy. In a smart world the payment will either be rejected at the point of sale or the customers could top up the wrong meter. In both instances the customer will be left off supply. We urge Ofgem to work closely with DECC over the development of the smart metering design solution and customer journey for prepayment meters, to ensure that processes develop in the best interests of the consumer.

If you require any further information please contact me on 0207 799 7960.

Best regards,



Gillian Cooper
Head of Energy Retail

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