

A Response by the Scottish Fuel Poverty Forum to the Ofgem Vulnerable Consumer Strategy Consultation

The Scottish Fuel Poverty Forum (the Forum) is the fuel poverty advisory body in Scotland that draws a wide range of stakeholders together to advise Scottish Ministers on matters that pertain to fuel poverty. The Forum's remit, while mainly focused on fuel poverty in Scotland, allows it to look across GB and actively engage with all Government Departments that have a role in the fuel poverty agenda. The Forum considers that the work of Ofgem in protecting vulnerable consumers is important in tackling fuel poverty in Scotland as well as across Great Britain. The Forum is an amalgamation of many organisations, NGO's Government agents, fuel suppliers and housing providers.

The Forum welcomes the opportunity to comment on this important strategy by Ofgem and would like to make the following comments. Please note however that the views expressed here are of a collective nature and this would not bind any of the organisations/companies that make up the Forum to hold that view individually. It is also likely that individual groups within the Forum will submit their own response to this consultation and that these individual responses may differ from the collective view expressed by the Forum as a group.

Question 1: Do our proposed Strategy themes provide an accurate reflection of the work Ofgem should be doing to help protect consumers in vulnerable positions?

Yes. The Forum is content with the strategy themes as they are outlined in the consultation document.

Question 2: Do you agree with our proposed perspective on vulnerability? Are there other risk factors or features of the energy markets that could present issues that we have not covered?

In addition to the criteria outlined the Forum would suggest that where customers live can place them in vulnerable situations and so become vulnerable customers. Those living off the gas grid without access to a range of affordable fuel types are vulnerable. For example those customers reliant of the purchase of fuels from an unregulated market, or customers who due to the nature of their dwellings construction have been unable to access programmes of support to date, CERT, CESP, EAP etc.

Question 3: What is your view on whether the BSI Standard on inclusive services could provide a practical approach to adopting our perspective on vulnerability?

The Forum welcomes the proposal to encourage suppliers and distributors to adopt BS 18477. Using a formal standard, agreed by consensus through BSI (as the national standards body), is the best way to establish a common benchmark that will be understood by the industry and consumers.

The Forum also understands why there might well be reservations that self-declaration to the standard will provide the level of confidence required by the market, government and the public interest.

With this in mind the Forum would suggest that consideration be given to the development of a certification scheme for BS 18477 so that compliance by suppliers and distributors can be verified by an independent certification body. This will provide a higher degree of confidence that the suppliers and distributors really do meet the standard.

The Forum would further recommend that the United Kingdom Accreditation Service (UKAS) should be consulted on the development and accreditation of a certification scheme for BS 18477. UKAS is the Government appointed National Accreditation Body and, as part of its responsibilities, accredits certification bodies for competence, consistency and impartiality.

UKAS accredited certification of suppliers and distributors against BS 18477 would provide users with the highest degree of confidence that the standard is being met and that consumer vulnerability is being properly addressed.

The Forum would also comment in relation to the Priority Services Registers held by all suppliers that these should be of a standard format. Currently each company has their own name for the register and this can be confusing for not only vulnerable customers but for those agencies who are supporting vulnerable customers. There should also be a protocol developed that automatically gives the details of a vulnerable customer on the PSR to any new supplier should that customer change supplier.

Question 4: What are your views on other approaches suppliers and distributors could take to adopt our proposed perspective on vulnerability in practice?

The Forum suggests that distributors have opportunities to work with the Scottish Government's National Retrofit Programme. While there is also potential to combine schemes using Government and ECO funding with renewables through RII0-ED1 and extension of the gas grid to fuel poor customers. Otherwise the proposals set out with the addition of the PSR seem to be the best approach which would allow all suppliers to support vulnerable customers.

The Forum is supportive of the Energy Best Deal and Energy Best Deal Plus in Scotland and believes that despite substantial efforts to assist customers through the Retail Market Review there is still a continuing need to provide impartial advice to vulnerable consumers.

Question 5: What are your views on our plans for developing a Consumer Vulnerability Network and are there additional organisations that we should engage?

The Forum believes that in terms of consumer engagement that this would be more meaningful if Ofgem alongside its established consumer panels in Scotland were to make better use of Scottish based consumer groups and devise a more proactive strategy for engagement with them.

For while Ofgem undoubtedly consult national consumer bodies, Consumer Focus or CAB's for example, these and other consumer facing groups have uniquely Scottish units or in the case of Citizens Advice Scotland completely separately constituted

bodies that will have specific knowledge of issues effecting Scottish consumers that the national body may not have and would have difficulty in articulating.

The Forum hopes that these comments are useful and welcomes the on-going dialogue with Ofgem and in particular the support of the Scottish Ofgem team in their attendance (as observers) at the Forum meetings. The team's input continues to ensure that the Forum is well briefed and better informed on national energy policy.

David Sigsworth

Chair of the Scottish Fuel Poverty Forum