

## **Plymouth Energy Community response to Ofgem's PSR Consultation July 2016**

### **2. Eligibility and customer identification**

#### **Customer eligibility**

Agree.

#### **Customer identification**

Disagree on point 2.21. It is essential that suppliers proactively identify vulnerable customers. Should make it clear that suppliers should use every point of contact to identify potentially vulnerable customers. Proposal does not go far enough.

The example of a customer mentioning they are chronically sick – I think this is unlikely to happen often. The customers we speak to usually find the call handlers difficult to communicate with – very scripted and unresponsive – so I think it is unlikely they will want to disclose personal details about illness or disability to someone they find unfriendly and unhelpful.

### **3. Priority services**

Agree.

### **4. Data recording and sharing**

No comment.

### **5. Awareness of priority services**

No comment.

### **6. Compliance and performance monitoring**

6.10 – Disagree. Compliance with license conditions underpinning PSR requirements should be in the companies' Treating Customers Fairly statement (section 6) - which Ofgem proposed initially. It's hard for people to find the information. That PSR doesn't apply to every customer is no reason why it shouldn't be there. About 10% of customers are on the register, and many of them will find it harder than average to find information.

#### **Other comments**

#### **Complaint reporting:**

We have spoken to over 100 people in the last two years who have had an issue with their energy supplier, which wasn't their fault, which has resulted in their falling into debt or avoiding using energy or heat for fear of debt. Vast majority are vulnerable. The most common issues are; incorrect billing and metering - often taking months or years to resolve (suppliers never seem to have a record of previous calls, even if they have been called many times about an issue); failure to identify vulnerable people and inappropriate use of pre-payment meters (such as installing in the home of a disabled person or an agoraphobic person). Most of these issues were never raised as a complaint despite the customer feeling they had been 'complaining' for months/years. We suggest that the numbers of recorded complaints from vulnerable customers are a lot lower than they should be, and suggest Ofgem should put in place methods to ensure more of these issues are recorded as complaints.

Customers do not realise that unless they register a formal complaint the supplier will be under no incentive to resolve their issue. We find suppliers rarely do anything to resolve, for example, wildly inaccurate bills, unless a formal complaint is raised. Customers never seem to do this without our support.

#### **Pre-payment meters:**

We ask Ofgem to ensure that pre-payment meters are never installed forcibly in the homes of vulnerable people. We have worked with many people who have had a pre-payment meter installed inappropriately – for instance in a basement when they can't get down stairs, or 10' up a wall behind a shared entrance doorway – only accessible by a ladder – in the home of a chronically sick customer.

We have had reports of customers have a pre-payment meter installed before any other debt recovery option has been explored. Pre-payment meters but not be installed unless safe and reasonably practicable.

#### **Supplier operative attitude:**

Ofgem should seek to ensure that call handlers at energy suppliers improve their attitude towards vulnerable people and customers who call to raise an issue. Customers calling to dispute a bill or meter reading are repeatedly told "the bill is correct" even when it will later turn out to be incorrect. If a customer wants to be taken seriously about his type of issue they will usually need to be extremely determined and demanding, otherwise they will be fobbed off and their pleas ignored. This is sometimes the case even when a customer has received a very unusual bill – such as several thousand for a month.

#### **Sanctions:**

We do not think that voluntary commitments from suppliers will be effective in ensuring that service to vulnerable customers improves. We think enforcement and sanctions are essential.