

Prepayment meters installed under warrant: final proposals consultation

Question 1: Do you agree with the outcomes intended as a result of our policy detailed in paragraph 2.4?

Agree, the intended outcomes are laudable and are difficult to find fault with.

Question 2: Do you agree with our preferred option as detailed in paragraphs 2.8 to 2.11?

The principle of proportionality is important. The present arrangements where a (vulnerable) customer would be charged for costs incurred by a supplier which far exceed the value of any debt are simply unreasonable. The potential act of withholding light or heat as a way of enforcing a debt is inhumane.

Perhaps the care agencies could automatically inform the utilities supplier when a person becomes vulnerable or crosses a certain threshold, in order to prevent enforcement action from being started. A cap would encourage suppliers to seek alternative methods to debt recovery.

Question 3: Do you have views on any further unintended outcomes which could be realised in addition to the risks outlined in paragraphs 2.47-2.50?

The point made at 2.49 is valid.

Consideration should be given to the effects of the "Smart Meter" rollout. Presumably any new meters installed will be "Smart" with the PPM function enabled. Moving forward, there will be no need to enter premises to fit a PPM as the PPM function can be enabled remotely and at negligible cost. Would this require a degree of enforcement action, presumably to be charged for, probably to be described as an "Administration fee"? Would the charges be to the full extent of the cap? Although outside the scope of this consultation, it must be asked what would be the charges to returning the meter to a "Credit meter" for new and existing customers.

Question 4: Do you agree that the cap should be applied when the warrant process is not completed and that no further detail is necessary? (See paragraph 2.55)

Disagree in part. A cap at some level should be in place. A concern here is that a minimal amount of work could take place and the full value of the capped charge could be applied.

Question 5: Do you agree with the proposal for a new debt path proportionality principle (as detailed in paragraphs 2.59 to 2.66), in that this would not be limited to warrant activities and would require costs and actions relating to ALL debt recovery activities (including transfer objections) to be proportionate? Do you have any views on unintended consequences of this broad scope?

Agree, Para 2.61 regarding smart PPM. It is difficult to understand why a customer in debt should be forced into paying for the installation of a "Smart" meter when customers who are not in debt are entitled to a similar installation free of charge.

Question 6: Do you agree with our definition of “under warrant” to mean a warrant that would authorise the installation of a PPM. Do you have any views on unintended consequences of this narrow scope?

No concerns.