



T: 0300 244 4000
E: scottish.ministers@gov.scot

Steve Osmani-Edwards
Email: prepayment@ofgem.gov.uk

7 November 2016

Dear Mr Osmani-Edwards,

Consultation on prepayment meters installed under warrant: final proposals

I welcome Ofgem's consultation outlining final proposals to protect consumers in the process of installation of prepayment meters (PPM) under warrant for non-payment of debt.

Installation of PPM under warrant should be avoided wherever possible, and only used as a last resort once all other avenues have been exhausted. Scotland has a higher proportion of PPM than the UK average and we are committed to challenging utility companies to do more for low income families and to reduce the need for PPMs.

Vulnerability has many forms and can be difficult to define and understand. We welcome the publication of Energy UK's Prepayment Meter Principles and are encouraged by supplier sign up, however more needs to be done. The energy market is changing at pace and regulation must be able to keep up to ensure consumers are sufficiently protected.

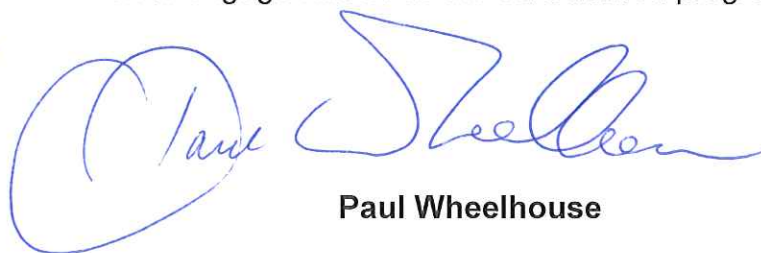
The current warrant process is not working well for consumers. There is a significant need to improve the transparency of process to ensure a consistent approach. We are greatly concerned that vulnerable and low income families are being further penalised and are supportive of steps to guard against disproportionate costs or actions throughout the debt recovery process. This can be a distressing and often confusing time for consumers and regulation must be significantly robust to adequately protect those who are vulnerable and/or find themselves in a vulnerable situation.

Smart meters have the potential to vastly improve the experience of PPM consumers. This presents a real concern that those who do not have smart meters installed, whether for technical reasons or because they refuse to do so continue to be subject to the unacceptable levels of detriment identified in the PPM sector. To this end safeguards must be in place to protect consumers locked out of the smart meter programme.



The proposed licence modifications are an important step in protecting the interests of consumers and we are keen to engage further as the consultation progresses.

Kind regards

A handwritten signature in blue ink, appearing to read 'Paul Wheelhouse', written in a cursive style.

Paul Wheelhouse