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To: Forward Work Programme 2018-19 <Forward.WorkProgramme2018-19@ofgem.gov.uk>

Subject: Response to consultation

Hi,

I attended the Cardiff stakeholder engagement event on 22 January which discussed the forward work program.

I work for the Speakeasy, a charity advice centre and I made some comments at the event but I would like to expand on what I said.

It was discussed how a vulnerable customer safeguard tariff should be employed next Winter if a general cap isn't ready to be imposed on SVTs. In my opinion, the best way to identify low-income households who will qualify for assistance is through automatic data-matching with the DWP to locate people receiving means tested benefits. This won't find everyone but will find a bigger majority than any other method.

I think that suppliers should also be asked to use the data they have on their priority services register to identify potentially vulnerable households to ask if they need assistance or automatically place them on the safeguard tariff.

Households with young children, older people and chronically sick/disabled people are all more likely to be on lower incomes as well as requiring higher energy consumption. Suppliers could proactively contact people who fall into these categories to ask if they are on a low household income and if so, put them on their cheapest available tariff or at the very least, the vulnerable customer safeguard tariff.

There should also be a means by which a customer and/or someone acting on their behalf (e.g. a support worker) can apply to go on the safeguard tariff for people who have slipped through the cracks and have not been automatically put onto it. I would expect take-up of this to be low, as it would usually be more beneficial to switch to that supplier's cheapest tariff instead of the safeguard one, so making contact with the supplier would usually result in this instead. To me, the safeguard tariff's main purpose seems to be to protect vulnerable people who do not or cannot engage with their suppliers in this way.

If you would like any clarification of what I've said or any further insight from the perspective of a front-line adviser, please feel free to contact me.

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