



Citizens Advice Scotland
Spectrum House
2 Powderhall Road
Edinburgh EH7 4GB
0131 550 1000
www.cas.org.uk

3rd December 2018

CAS response to SEI and SECV Guidance Amendments

Citizens Advice Scotland uses research and evidence to put consumers at the heart of policy and regulation in the energy, post and water sectors in Scotland. We work with government, regulators and business to put consumers first, designing policy and practice around their needs and aspirations.

Under our remit, we are the advocate for Scottish consumers on energy network issues. Although we are separately funded organisations, we work closely with colleagues in Citizens Advice England and Wales in this area.

Please find our comments in relation to the proposed changes to the SEI and SECV Guidance document below. Our comments only relate to the amendments proposed. Further thoughts on the SECV more generally can be found in our soon to be published essay *Incentivising Support for Vulnerable Customers*.

While we welcome the majority of the proposed changes, we have some concern about the proposal to remove the independent assessment component of the SECV incentive assessment.



Response to amendments

1. We support the increase in length of the Panel Session from 20 minutes to 40 minutes and agree that the extra time will help network companies explain the progress they have made from one year to the next. We also support the idea of network companies presenting in the panel session.

2. We welcome the amendment to the feedback process where scores and feedback will not be given on the same day as the panel session. We agree that the time for deliberation will allow the panel to come to a thought through decision.

3. We also strongly welcome the introduction of 'public facing' Panel Report. As detailed in our recent publication *Pylons, Pipes and People*¹, network companies reported that they would like additional feedback in the SECV assessment process and particularly want feedback on why scores given by the independent assessor were different to those assigned by the Ofgem panel. We think that a Panel Report could be an opportunity to provide network companies with more feedback about the decision making process and will help to retain confidence in the way the scores are allocated. Importantly the Panel Report would be a useful document for other organisations, such as Citizens Advice Scotland, to scrutinise network company performance and to ensure the assessment process is as transparent as possible.

4. We also think that the sharing of best practice is an important part of the SECV process which could be expanded. While Ofgem's *Vulnerable Consumer in the Energy Market Report* listed a number of examples of network company best practice, we think that a more formal approach to the sharing of best practice could be adopted. This may be facilitated through the production of a Panel Report and we would suggest that this should form a significant section of the report. This will help to ensure that service provision is driven up across GB.

5. While we welcome the proposal to incorporate Consumer Vulnerability into the remit of the panel, we have some concern of the proposal to remove the independent assessment from the SECV process. Some DNOs report that due to the time given by independent assessors (multiple hours spent within the network company offices) that they have a good understanding of how vulnerability strategies are truly implemented. Network companies also value the detailed feedback given by the reports produced by the independent assessors which also allow for comparison of activity between companies. This also facilitates the sharing of best practice.

If you have any comments on the points made in this response don't hesitate to get in touch.

Dr Jamie Stewart
Energy Policy Manager
Citizens Advice Scotland.

¹ <https://www.cas.org.uk/publications/pylons-pipes-and-people>