15th February 2019

Ofgem 10 South Colonnade Canary Wharf London E14 4PU

To Whom It May Concern

ACS Response: Ofgem Forward Work Programme

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to Ofgem's consultation on their draft Forward Work Programme. ACS is a trade association representing 33,500 convenience stores across the UK. Our members include One Stop, Spar UK, Costcutter and thousands of independent retailers.

The nature of convenience retail, with long operating hours, intrinsic use of refrigeration and other equipment, means that energy costs are a significant burden. The costs of energy are a critical factor in the viability of a convenience store businesses, therefore we welcome Ofgem's commitment to conduct a strategic review of the microbusiness retail market, particularly as the majority (74%) of convenience stores are run by independent retailers.

We hope that the review will address challenges that convenience retailers experience as energy customers, including overcharging and above inflation costs. ACS has been engaging with officials from Ofgem's Consumer Vulnerability Strategy team and their work on the strategic review of the microbusiness retail market and welcomes continued engagement as the review progresses.

We also welcome the commitment in Ofgem's Forward Work Programme to support the Government with its programme to roll-out smart metering to all domestic and smaller nondomestic premises. ACS' Voice of Local Shops survey of 1,210 independent convenience retailers in 2018, found that 29% of independent convenience retailers already had a smart meter installed in their business, 34% were aware of the government's smart meter roll out, and 32% were not aware that a smart meter was going to be installed in their business by 2020. As such, in our submission to the Department for Business, Energy and Industrial Strategy's consultation on the smart metering implementation programme, we will be calling for increased engagement with microbusiness to build their awareness and understanding of the use of smart meters.

For more information, please contact Julie Byers, ACS Public Affairs Manager by emailing Julie.Byers@acs.org.uk.

Yours sincerely

James Lowman Chief Executive