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16th August 2019

Dear Meghna

### **Draft Consumer Vulnerability Strategy 2025 Consultation**

Shell Energy Retail Ltd welcomes the opportunity to respond to this consultation and especially for granting us an extension to do so. We strongly believe in building an even fairer strategy and maintaining focus on the key industry objective of protecting Vulnerable Consumers.

We broadly support the strategy and feel the five principles will help drive better services for consumers in vulnerable circumstances, with the following further suggestions.

- Greater level of detail on Ofgem's regulatory approach to Price Comparison Websites (PCW's). An increasing number of customers use PCW's to switch energy supplier, and therefore we would like Ofgem to consider PCW's and how they intend to meet the needs of vulnerable customers. For example, some PCW's do not consider the financial implications of a vulnerable customer switching from a supplier who is part of the Warm Home Discount scheme to a supplier that is not. Therefore comparative savings may be lower than anticipated as the new supplier is not part of the scheme.
- Consider further the impact of the Default Tariff and Prepayment Meter Price Caps on the ability of suppliers to innovate services for customers in vulnerable circumstances. It would be beneficial over the medium term, if there was an allowance under both caps for suppliers to develop vulnerable customer offerings. The energy market is on the verge of widespread changes, and the distributional impacts of these changes need to be monitored. Appropriate customer offerings have to be developed for vulnerable customers, based on anticipating emerging markets and the future impact of network charging.
- The draft Consumer Vulnerability Strategy could do more to clarify the issue of energy affordability. As energy is an essential service there is ongoing consumption. However affordability goes wider than the energy industry. We would like to play a supportive and



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transparent role for all our customers. We believe energy suppliers having a clear role in doing this would benefit all involved.

If you would like to discuss any of the points raised in our response or have any specific queries, please do let us know.

Yours sincerely

[Not signed]

**Paul Farmer**  
**Industry Code Manager**