

Citizens Advice Scotland's response to Ofgem's Open Letter Consultation on the approach to setting the next electricity distribution price control (RIIO-ED2) (October 2019)

Who we are

The policy teams at CAS use research and evidence to put people 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. We aim to represent the views of different consumer groups using evidence of consumer views and supporting research wherever possible.

CAS advocates for domestic and microbusiness consumers on matters relating to energy networks in Scotland, and although we are separately funded organisations, we work closely with our colleagues at Citizens Advice in this area. We therefore welcome the opportunity to respond to Ofgem's open letter consultation on the approach proposed for RIIO-ED2. Our response to this consultation is not confidential and it may be published in full.

Our response is split into 5 sections:

- Objectives, outcomes, and lessons from RIIO-ED1
- Consumer priorities for RIIO-ED2 in Scotland
- Supporting the decarbonisation of transport in Scotland
- Protecting the interests of low income and vulnerable consumers in Scotland
- Supporting the decarbonisation of heat in Scotland
- Enabling Whole System Solutions

Executive Summary

- CAS welcomes Ofgem's overarching objective and the associated outcomes envisaged for RIIO-ED2, but the regulator must heed lessons from RIIO-ED1, where DNOs have often been allowed to generate large returns in the absence of exceptional overperformance against targets
- CAS is supportive of Ofgem's intention to incentivise DNOs to continue to make anticipatory investment in their networks. However, given the high level of uncertainty that currently exists around how to achieve statutory 'net zero' targets and the potentially

significant impacts of future policy decisions in this area upon DNOs' activities, we believe that such investment in RIIO-ED2 should focus on a core of least regrets solutions and do not believe volume drivers are an appropriate uncertainty mechanism to deliver best value consumer outcomes

- While we are supportive of moves to further incentivise DNOs to innovate to find the most cost-effective solution for consumers, we would caution against a reliance on nascent technologies and untested assumptions that consumers will embrace flexibility services and other new technologies at scale, or enthusiastically engage in significant behaviour change, in the absence of fundamental changes being made to the relationship between consumers and their DNO
- Scottish consumers want an electricity distribution network that is – above all else – affordable, safe, and reliable. Older consumers and those in lower socio-economic grades are particularly worried about the affordability of their DNO's activities, and there is widespread concern among all consumers that the energy transition will have negative consequences for low income and vulnerable consumers in Scotland
- While CAS recognises the need for DNOs to be allowed to invest in their networks in advance of the anticipated upsurge in demand for both public and domestic EV charging, with 24.9% of Scottish households already in fuel poverty we are concerned about how this can be funded in a way that does not harm financially vulnerable Scottish consumers. We therefore believe that DNOs should be required to work closely with central and local government, licenced electricity suppliers, and the private sector, to design a funding model that allows the network costs associated with EVs to be borne by those who will directly benefit from an enhanced EV charging infrastructure and who are also in a position where they are able to pay for its rollout
- There is strong support among Scottish consumers for provisions to be made that ensure that those least able to engage with the scale and pace of change that will be required by the energy transition are not left behind in the rush towards a more sustainable future. CAS therefore believes there would be widespread support in Scotland for the introduction of a PCD in RIIO-ED2 in the form of a 'use-it-or-lose-it' allowance targeted at the needs of low income and vulnerable consumers
- CAS is encouraged by Ofgem's desire to encourage DNOs to adopt a whole system approach for RIIO-ED2. However, while the adoption of a whole system, whole nation approach would be expected to yield best overall value to consumers, it is unclear how

investment in technologies designed to avoid the need for local network reinforcement should be funded where such investment leads to net system benefits, but where the greater proportion of those benefits is felt by consumers in other DNO regions. In Scotland, where the electricity distribution networks for a given area are owned by the same operating group as the electricity transmission network for that region, the adoption of a whole system approach also presents a unique potential for cross-subsidy between distribution and transmission businesses which may not always be in the interest of consumers

Objectives, outcomes, and lessons from RIIO-ED1

1. CAS welcomes Ofgem's overarching objective and the associated outcomes envisaged for RIIO-ED2. Electricity distribution network operators (DNOs) play a vital role in the functioning of everyday life in GB, and in a 21st century economy that is increasingly reliant on electricity to power our homes and businesses, it is essential that they are allowed to invest appropriately to ensure the delivery of a high quality, safe and reliable network infrastructure to all GB consumers.
2. Since privatisation in the early 1990s, the 14 DNOs in GB have made significant progress in improving the reliability of their networks while driving down the cost of their activities on consumer bills, and it is important that these fundamentals continue to sit at the heart of their activities in the RIIO-ED2 price control period. However, our colleagues at Citizens Advice have previously found that DNOs have often been allowed to generate excessive returns in response to relatively average levels of performance during RIIO-ED1^{1,2}. This has recently been confirmed by Ofgem's own analysis³ and follows similar criticisms issued by the Energy and Climate Change Intelligence Unit (ECIU), both for the 5 years preceding RIIO-ED1⁴ and the first year of the current price control⁵.
3. CAS does not underestimate the scale of the forecasting challenge faced by Ofgem when setting the next electricity distribution price control, but it is clear that the level

¹ Energy Consumers' Missing Billions: The profits gifted to energy networks; Citizens Advice; July 2017

² The Postcode Lottery in Energy Profits: A regional update of Energy Consumers' Missing Billions; Citizens Advice; April 2018

³ State of the Energy Market 2019; Ofgem; October 2019

⁴ Monopoly Money: How the UK's electricity distribution network operators are posting big profits; ECIU; September 2017

⁵ RIIO Carnival: How new Ofgem regulations are failing to hit high network company profits; ECIU; January 2018

of error in previous forecasts has been significant and that consumers have faced electricity distribution network costs that have been considerably higher than necessary for more than a decade. CAS therefore welcomes reforms to the length of the price control and the introduction of enhanced Return Adjustment Mechanisms for RII0-ED2, and we would hope that the findings of Citizens Advice in their *Energy Consumers' Missing Billions* report⁶ are acted upon appropriately when assessing the business plans of the respective DNOs for the next electricity distribution price control.

4. Alongside the delivery of a safe and reliable network, a renewed focus on the environmental sustainability of DNO activities is also now essential, however, with the UK parliament⁷ and the Scottish Government⁸ both formally recognising the climate emergency in the Spring of 2019. CAS therefore supports the inclusion of environmental outputs in the assessment of DNO performance during RII0-ED2. However, this must not be viewed simply in terms of the carbon intensity of a DNO's activities, and should include consideration of a DNO's approach to land and water management and a focus on their reduction of other harmful substances arising from their activities, such as emissions of sulphur hexafluoride (SF₆), nitrogen oxides (NO_x), and particulates.
5. CAS recognises that DNOs also have a central role to play in the decarbonisation of the wider economy by their provision of much of the infrastructure required to support the proposed expansion at scale of the electrification of transport and heat. With the UK government currently proposing a ban on the sale of all new conventionally powered petrol and diesel vehicles by 2035⁹, and the Scottish Government committed to achieving net zero emissions by 2045¹⁰, the scale of these challenges and the extent and rate of change required to meet them cannot be overstated.
6. CAS is therefore supportive of Ofgem's intention to incentivise DNOs to make anticipatory investment in their networks. However, given the high level of uncertainty that currently exists in relation to both local and national routes to decarbonisation and the potentially significant impacts of future policy decisions in this area on DNOs, we

⁶ Energy Consumers' Missing Billions: The profits gifted to energy networks; Citizens Advice; July 2017

⁷ <https://www.theguardian.com/environment/2019/may/01/declare-formal-climate-emergency-before-its-too-late-corbyn-warns>

⁸ <https://www.independent.co.uk/environment/climate-change-scotland-emergency-global-warming-nicola-sturgeon-snp-conference-a8891071.html>

⁹ <https://www.thetimes.co.uk/article/ban-on-petrol-and-diesel-cars-could-be-accelerated-wn7q8pshg>

¹⁰ Climate Change (Emissions Reduction Targets) (Scotland) Bill

believe that such investment in RIIO-ED2 should focus on a core of least regrets solutions, with a range of uncertainty options that can be drawn down during the price control to provide the flexibility to respond in different ways to a policy landscape that is likely to change considerably over the lifetime of RIIO-ED2. We do not, however, believe that volume drivers represent the best way to manage this uncertainty as these take no account of the presence or absence of local distribution network constraints, and adverse consumer outcomes would, in our view, be commonplace.

7. While we are also supportive of moves to further incentivise DNOs to innovate to find the most cost-effective solution for consumers, we would also caution against a reliance on nascent technologies and untested assumptions that, in the absence of fundamental changes being made to the relationship between consumers and their DNO, consumers will embrace flexibility services and other new technologies at scale, or enthusiastically engage in significant behaviour change, during the next price control.

Consumer priorities for RIIO-ED2 in Scotland

8. Recognising the scale of the challenge posed by the energy transition, we recently commissioned research into consumer attitudes towards the gas and electricity distribution networks in Scotland¹¹. The findings of this research, which we intend to publish by the end of 2019, reveal that consumers currently have a very distant relationship with their DNO, with awareness of the two electricity distribution networks that operate in Scotland extremely limited. In a survey of more than 1500 Scottish consumers, just 1% of those resident in the North of Scotland correctly identified Scottish and Southern Electricity Networks (SEN) as their DNO, while in the South of Scotland electricity distribution area, only 3% of residents correctly identified their DNO as SP Energy Networks (SPEN). In addition, just 28% of our survey was able to correctly identify the functions of a DNO when presented with a list of possible roles, with the vast majority conflating the role of their DNO with functions delivered by other parties in the electricity supply chain across generation, transmission and/or retail businesses.
9. Despite this, consumer satisfaction with their DNO is high at 78%, driven largely by the perceived reliability of their electricity supply and the overall level of service provided. Of note, dissatisfaction with the Scottish DNOs is particularly low among

¹¹ Research was undertaken by Accent Market Research in Spring 2019. Research included focus groups and an interactive survey of 1500 Scottish consumers.

those in our survey who self-identified as having a vulnerability, with only 2% of our vulnerable customer sample expressing any level of dissatisfaction with the standard of service they receive from their DNO. Overall, however, all consumers are generally less satisfied with the value for money they receive from their DNO, with those in lower socio-economic grades particularly concerned about the impact of their DNO's activities on the size of their electricity bill.

10. With this in mind, we asked the consumers surveyed what their priorities would be for the next electricity distribution price control, having first outlined to them the challenges faced by DNOs in response to the significant changes to the way in which electricity is generated and used that have both occurred to date and that are expected to occur in the future. Of 7 potential areas of investment, the delivery of an electricity distribution network that is affordable, safe, and reliable was prioritised, with older consumers and those in lower socio-economic grades particularly concerned about the affordability of their DNO's activities. Investment in measures designed to protect vulnerable consumers and in reducing the environmental impact of the electricity distribution network ranked next, with older consumers, vulnerable consumers and those in lower socio-economic grades prioritising vulnerability, and younger and more financially secure consumers more inclined to prioritise environmental impact mitigation. Lowest on the priority list for our consumers was investment in innovation and improving customer satisfaction.
11. Underlining the distant relationship between consumers and their DNO, only 14% of our consumers could recall ever contacting their DNO, with the vast majority of these contacts having been made in relation to an interruption to the electricity supply. This low incidence of contact, combined with a high overall level of satisfaction and a perception among some of our consumers that electricity suppliers are effectively the direct customers of the DNOs, can perhaps help to explain why such low prioritisation is given by our respondents to further improvements in customer satisfaction in the next electricity distribution price control. Though good customer service is not seen as being unimportant, the affordability of the electricity distribution network rated twice as important as improvements in customer satisfaction overall.
12. The low priority given to investment in innovation during the next price control gives a further indication of the scale of the challenge with which DNOs are currently faced. In qualitative discussions, consumers we surveyed explained that despite having been provided with an overview of the energy transition on which so much of the planning for RIIO-ED2 is based, they struggle to envisage how the industry's predictions of a

smart, flexible and responsive future will be realised, and the impact this will have on their relationship with their DNO. On a very basic level, innovation was also seen as something that all companies should be doing as part of their 'business as usual' activities in an attempt to grow and/or increase profits, and some of our consumers therefore questioned whether this was something that should be paid for by consumers via sizeable incentives that are ultimately funded through their electricity bill.

13. We also introduced the consumers surveyed to a range of flexibility services and provided a brief explanation of how each would work, and of the benefits each would be expected to bring from a bill-payer perspective. Our findings reveal a relatively high degree of interest (59%) in the expansion of Time of Use tariffs, with two thirds of consumers with a smart meter expressing an interest compared with 55% of those with a traditional meter, and levels of interest in such an offering relatively consistent across age groups. Three quarters of those who currently make use of electric room or space heaters as their primary source of space heating also expressed an interest in smart electric storage heaters, but only 31% of our survey expressed any level of interest in smart electric vehicle (EV) charging – the lowest of all of the flexibility services presented in our survey. This is particularly noteworthy given the level of importance that is currently being placed by industry on the ability of EVs to provide flexibility services beyond demand side response as an alternative to network reinforcement.
14. The consumers surveyed were also asked how willing they would be to provide flexibility in more traditional ways, such as by changing the way in which they use energy if such a change were to lead to a reduction in their bills. Unsurprisingly there was a relatively high level of support for such a proposition, with 80% of our sample stating that they would be prepared to change their behaviour to reduce energy costs and only 13% indicating that they would be resistant to such an idea. However, qualitative research suggests that such enthusiasm for behaviour change may be misleading, as most consumers (57% of those who indicated that they would be prepared to change their behaviour) did not envisage an ability or willingness to make significant lifestyle changes as a route to cheaper bills. The availability and uptake of technology are therefore seen as key drivers for consumers to be able to effectively engage with flexibility but several barriers to effecting change were highlighted, particularly around the affordability and acceptance of new technology, and lifestyle factors such as inflexible working hours and vulnerability.

Supporting the decarbonisation of transport in Scotland

15. In its 2017 Programme for Government, the Scottish Government announced its ambition to eliminate the need for new petrol and diesel cars and vans by 2032¹². While this currently stops short of legislating for an outright ban on the sale of new petrol and diesel cars and vans before the UK Government's proposed 2035 deadline, this ambition was reaffirmed in the 2018 Programme for Government, where the Scottish Government pledged to create at least 20 'electric towns' by 2025 and to provide funding to invest in a fleet of 500 ultra low emission vehicles (ULEV) for the public sector, more than 100 new 'green buses', and an additional 1500 EV charging points in a combination of domestic, commercial and public settings¹³. In September 2019, the Scottish Government also committed to creating the conditions required to phase out the need for all new petrol- or diesel-fuelled cars and light commercial vehicles in Scotland's public sector fleet by 2025, and to phase out the need for all petrol and diesel vehicles – including heavy goods vehicles – from the public sector fleet by 2030¹⁴. A new strategic partnership with Scottish DNOs was also announced in August 2019 to improve the public EV charging infrastructure in Scotland¹⁵.

16. Despite government policy on the decarbonisation of transport being heavily reliant on plug-in hybrid and EVs, however, our consumers apparently lacked enthusiasm for smart EV charging. However, this might be partially accounted for by the relatively low rate of EV market penetration at present¹⁶. EVs are also still seen by many as being beyond their financial reach and less flexible than a petrol- or diesel-fuelled alternative due to their relatively limited range and relatively long charging times, all of which are issues beyond the immediate gift of DNOs or governments to resolve if EVs are to gain enthusiastic and widespread public acceptance.

17. Nevertheless, CAS is supportive of efforts to increase the publicly available network of EV charging points to help drive the uptake of EVs and plug-in hybrid vehicles, and we recognise the need for DNOs to be allowed to invest in their networks in advance of the anticipated upsurge in demand for both public and domestic EV charging. With

¹² A Nation with Ambition: The Government's Programme for Scotland 2017-18

¹³ Delivering for Today, Investing for Tomorrow: The Government's Programme for Scotland 2018-19

¹⁴ Protecting Scotland's Future: The Government's Programme for Scotland 2019-20

¹⁵ <http://news.ssen.co.uk/news/all-articles/2019/august/charging-ahead-with-evs/>

¹⁶ <https://www.nextgreencar.com/electric-cars/statistics/>

24.9% of Scottish households already in fuel poverty¹⁷, however, we are concerned about how this can be funded in a way that does not harm financially vulnerable consumers.

18. In 2017, 28.1% of all households in Scotland did not have access to a car or van for personal use¹⁸. This compares with a 10-year high of 31% of all households with no access to a vehicle for personal use in 2012 and is the lowest figure in more than a decade¹⁹. As might be expected, however, access to a private vehicle increases with household income, and so the distribution of households without access to private transport is disproportionately higher among lower income households. Thus, while 23.7% of households with a net household income between £20,000 and £25,000 per annum did not have access to a vehicle for personal use, this rose to 63.1% of households with a net annual income less than £10,000 per annum²⁰.

19. 70% of income poor households in Scotland are either in fuel poverty or extreme fuel poverty²¹. Given that such households are also much less likely than the national average to have access to a private vehicle, CAS believes it would be highly regressive to require income poor households to fund an EV rollout programme from which they are significantly less likely to directly benefit than more affluent households. Funding an EV charging infrastructure and any associated network reinforcement via a universal or consumption-linked charge on all consumers' electricity bills would place further financial stress on households who are already struggling to meet their essential fuel costs and would run counter to the efforts of the Scottish and UK governments to alleviate fuel poverty. We therefore feel strongly that DNOs should be required to work closely with central and local government, licenced electricity suppliers, and the private sector, to design a funding model that allows the network costs associated with EVs to be borne by those who will use this infrastructure and who are able to pay for its rollout, for example via a combination of taxation and electricity bill levies targeted at those who use EVs.

¹⁷ Scottish House Condition Survey 2017

¹⁸ Scottish Household Survey 2017: annual report

¹⁹ <https://www.transport.gov.scot/publication/scottish-transport-statistics-no-37-2018-edition/sct01193326941-04/>

²⁰ Scottish Household Survey 2017: annual report

²¹ Scottish House Condition Survey 2017

Protecting the interests of low income and vulnerable consumers in Scotland

20. Our research shows that there is a high level of concern among consumers in Scotland that lower income households might be left behind by the energy transition, and for the impact that may have on vulnerable consumers' bills. For example, 79% of our respondents are concerned that households on lower incomes may not be able to take advantage of technology that helps them reduce their impact on the gas and electricity distribution networks, with only 5% of our sample expressing an opposing view. An even higher proportion of our survey (80%) thought that gas and electricity distribution companies should assist households on lower incomes to engage with the energy transition, with only 3% of our consumers disagreeing with this proposition. In both cases the strength of feeling of our respondents was notable, with more consumers 'strongly' agreeing with the concepts raised than those who indicated that they were merely 'tended to' agree.
21. In qualitative discussions, these opinions were attributable to a view that the gas and electricity distribution network operators are to some extent duty bound to provide a level of support to financially vulnerable consumers, and from our discussions it is apparent that the mutual benefits to consumers and the network companies arising from the development and adoption of these new technologies at scale are not lost on the public. However, the potential increase in the prevalence of Time of Use tariffs causes concern that those consumers who are unable to adapt their energy consumption profile, and who are unable to invest in energy storage technologies, may be unfairly penalised for their inability to be flexible in the way in which they use their energy. In this context, elderly and low-income consumers are seen as those most in need a reduction to the size of their energy bills, yet are also considered least able to afford the technologies that would allow them to reduce their costs.
22. As stated above, our survey shows that there is widespread concern among consumers that the energy transition will have negative consequences for low income and vulnerable consumers, and strong support for provisions to be made that ensure that those least able to engage with the scale and pace of change that will be required in the coming years are not left behind in the rush towards a more sustainable future. It is therefore noteworthy that of the 80% of our survey that supported the idea of Scottish gas and electricity distribution network operators assisting lower income households to engage with the energy transition, 62% would support the provision of smart, high efficiency, low carbon heating systems to those homeowners least able to afford them, while 63% would also support the provision of funding to reduce the cost

of other smart technologies such as domestic battery storage that would make it easier for such households to take advantage of Time of Use tariffs, for example.

23. CAS therefore believes there would be widespread support in Scotland for the introduction of a Price Control Deliverable (PCD) in RIIO-ED2 in the form of a 'use-it-or-lose-it' allowance targeted at the needs of low income and vulnerable consumers. This would be similar to a PCD proposed for RIIO-GD2 and could be used by DNOs to fund innovative solutions to help their vulnerable and low income customers keep pace with the energy transition. This might include targeted, high value interventions such as the provision of battery storage to low income consumers with a health condition that leaves them reliant on mains-powered medical equipment; smart, high efficiency, low carbon heating systems to low income homeowners who are unable to access alternative sources of funding such as that currently provided by the Energy Company Obligation and the Scottish Government's Warmer Homes Scotland scheme; and/or lower value interventions that could be spread more widely among a DNO's customer base.

Supporting the decarbonisation of heat in Scotland

24. Even more so than with transport, the future of heat in GB remains subject of much debate, with a variety of technologies competing for the attention of policymakers. Unlike in Wales, however, heat is an issue devolved to the Scottish Government. Combined with legislation passed in September 2019 that commits Scotland to achieving net zero emissions status 5 years ahead of the rest of GB²², there is a risk that this will result in divergent policies from those adopted in the rest of GB that will require SPEN and SHEPD to go further and faster towards the delivery of a 'net zero' compatible network during RIIO-ED2 than will their counterparts in England and Wales.
25. 292,000 (12%) of Scotland's homes currently rely on electricity as their primary source of space and hot water heating²³, but with an abundance of untapped renewable electricity generating potential and limited capacity to export excess electricity to the rest of GB, it seems almost certain that this figure will rise as routes to achieving the decarbonisation of heat are developed within each of the 32 local authority areas in Scotland under the Scottish Government's Local Heat and Energy Efficiency Strategies.

²² Climate Change (Emissions Reduction Targets) (Scotland) Bill

²³ Scottish House Condition Survey 2017

It will therefore be essential when assessing the Scottish DNOs' business cases for RIIO-ED2 that they are viewed in the context of a policy landscape that is likely to differ significantly from that which exists in the rest of GB, and that the outputs and incentives for the next price control are set in such a way as to support the environmental targets set by the Scottish Government at least cost to Scottish consumers.

Enabling Whole System Solutions

26. CAS is encouraged by Ofgem's desire to encourage DNOs to adopt a whole system approach when scoping and delivering on their business plan for RIIO-ED2. In our recent response to the BEIS consultation *Facilitating Energy Efficiency in the Electricity System*, we called for the adoption of a whole system, whole nation view of investment in RIIO-ED2, where DNOs are incentivised to invest in, and support the third-party development of, energy efficiency projects on their networks where they meet a whole system (as opposed to local network) level need. We therefore cautiously welcome Ofgem's ideas on encouraging whole system solutions more widely in the RIIO-ED2 price control.
27. The benefits of adopting innovative solutions to relieve electricity distribution network constraints are well established, having already been demonstrated by projects such as SSEN's Orkney Smart Grid²⁴. However, CAS believes that a whole system approach must be allowed to go beyond active network management, and should include more traditional routes to demand reduction such as investment in energy efficiency. SSEN's Northern Isles New Energy Solution (NINES)²⁵ project is a recent example of this.
28. It is notable, however, that the success of such projects is often likely to depend to a greater or lesser extent on consumer behaviour change and/or the acceptance and efficient use of new technologies at scale. Strong community buy-in to the aims and objectives of the DNO would therefore appear to be essential, with practical support for consumers made readily available before, during and after a given project's completion. However, as noted at the very beginning of this response, consumers currently have a very distant relationship with their DNO, and the scale of the challenge DNOs will face to overcome this is likely to be significant.

²⁴ <https://www.ssen.co.uk/OrkneySmartGrid/>

²⁵ <http://www.ninessmartgrid.co.uk/>

29. While the adoption of a whole system, whole nation approach would be expected to yield best overall value to consumers, it is also unclear how investment by a DNO (or indeed a distribution system operator) in technologies such as demand side response, storage or energy efficiency should be funded, where such investment leads to net system benefits but where the greater proportion of those benefits is felt by consumers in other DNO regions (e.g. through constraint alleviation at transmission level, or a reduced reliance on the capacity market by decreasing network stress). In Scotland, where the electricity distribution networks for a given area are owned by the same operating group as the electricity transmission network for that region, this also presents a unique potential for cross-subsidy between distribution and transmission businesses which may not always be in the interest of consumers. Ofgem must therefore take care to ensure that it does not allow excessive levels of profit to be derived from the adoption of a whole system view, and to ensure that a suitable mechanism exists to ensure that relevant costs incurred by a whole system solution are allocated fairly among consumers at whole system level.

Citizens Advice Network in Scotland

Citizens Advice Scotland (CAS), our 59 member Citizen Advice Bureaux (CAB) and the Extra Help Unit, form Scotland's largest independent advice network. Advice provided by our service is free, independent, confidential, impartial and available to everyone. Our self-help website Advice for Scotland provides information on rights and helps people solve their problems.

In 2017-18 the Citizens Advice Service network helped over 295,100 clients and dealt with almost 800,000 advice issues for clients living in Scotland. With support from the network clients had financial gains of almost £142.2 million and our self-help website Advice in Scotland received approximately 3.2 million page views. On energy consumers issues in particular, we advised on over 41,000 energy-related issues in 2017-18, generating over £1.8m in client financial gain²⁶.

Our extensive footprint is important in helping us understand how issues impact locally and nationally across the country and the different impacts that policies can have in different areas.

²⁶ https://www.cas.org.uk/system/files/publications/cas_energy_advice_detail_2017_18_published.pdf