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Dennis Berg
Ofgem

Sent by email to CDconsultations@ofgem.gov.uk

Dear Dennis

Bulb response to Ofgem consultation on extending SLC 22G

Bulb supports the extension of SLC 22G to 2025. Ofgem should ensure that all suppliers are complying with these rules. In our recent compliance case on this issue, Ofgem set out that suppliers must charge restricted meter customers the same standing charge - and the same number of standing charges - as single rate customers. Ofgem reiterated that suppliers cannot make access to single rate tariffs conditional on customers changing meter set ups.

We have conducted research into whether suppliers are making their single rate tariffs available to restricted metering customers. We have found that some suppliers do not seem to be complying with SLC 22G. We have researched 13 suppliers so far and compared their Ts&Cs to the offerings made on the phone and online. Our preliminary findings reveal that knowledge of restricted metering setups amongst customer service teams is very low.

We are concerned that there was a significant amount of misinformation, including from one supplier who advised that the related meter needed to be "fixed" by the current supplier before they could switch. Some suppliers could not advise on whether they would charge two standing charges for two MPANs, even when the issue was escalated to senior handlers. We will provide the detailed results of our research separately to Ofgem and Citizens Advice.

Ofgem highlights that consumers have limited understanding of their protections under SLC 22G. Given our research, Ofgem should engage with suppliers with more than 50,000 customers to understand:

- Are suppliers making available all tariffs, including loss-leading fixed tariffs, to all customers?
- Are suppliers putting barriers in the way to make it hard or impossible for restricted metering customers to take up certain tariffs?
- Are suppliers using key prompt points to highlight alternative tariffs to these customers?

We also support the continued use of a sunset clause for these rules.

Best wishes

Tom

Tom Lowe
Head of UK Regulatory Affairs