

Code Reform - Electricity Systems Team,
Department for Business, Energy and Industrial Strategy,
Abbey 1, 3rd Floor,
1 Victoria Street
London
SW1H 0ET

Sent by email to: codereform@beis.gov.uk & industrycodes@ofgem.gov.uk

5th September 2019

Dear Sir

Consultation - Reforming the Energy Industry Codes.

The Association of Chief Trading Standards Officers (ACTSO) is the single membership organisation representing senior Trading Standards Managers from councils across England and Wales.

National Trading Standards delivers national and regional consumer protection enforcement. Funded by BEIS; its purpose is to protect consumers and safeguard legitimate businesses by tackling serious national and regional consumer protection issues and organised criminality.

This response is sent on behalf of both organisations.

We have noted your current consultation

https://www.gov.uk/government/consultations/reforming-the-energy-industry-codes?utm_source=02f9ac86-c82a-4e46-b635-1120d83ebd4a&utm_medium=email&utm_campaign=govuk-notifications&utm_content=

and wished to express our views about the regulatory and enforcement system.

We are supportive of the proposals to bring the 11 current industry codes under one umbrella. The current regulatory regime is extremely complex and any move to streamline the process for energy providers will make things easier for smaller new entrants.

We have seen exploitation by unscrupulous businesses in relation to the energy sectors. Of the very large consumer protection frauds being investigated by National Trading Standards, six relate to energy scams, on both supply and tariffs. The sector seems to provide fertile ground for potential scammers to mislead consumers about the nature and value of products and misappropriate energy tariffs and grants.

We believe there is need to ensure that consumer interests are embedded in the new regime and its industry codes. Requirements should be specifically referenced in codes to ensure being fair to consumers is a central plank of operation.

To ensure that is happening code owners need to ensure that there is adequate and properly funded auditing of the new regime to ensure compliance. Previous codes (such as green deal) and more recently the SMICoP (smart meter code) are felt by Trading Standards to not have been adequately policed which results in consumer detriment. Supervision and compliance must be built into whatever is devised moving forward.

I hope this is helpful and if you wish to discuss the matter with us, please contact our office at admin@actso.org.uk

Yours faithfully



Trish Caldwell
Chair ACTSO



Lord Toby Harris
Chair NTS