

**To:** Bart Schoonbaert

**Subject:** Smart pre-payment for a smarter market - consultation

Mr Schoonbaert, good morning.

I do hope that this is the correct channel for feeding back regarding the above consultation. My apologies if not.

I am sure that some contributors will have more specific feedback but these points and questions may prove thought provoking.

2.4 – How is it ensured that suppliers will leave a meter in credit mode for the duration of the switch and, how is the customer expected to pay for the energy used during this period? Do suppliers use a central data recording point for information of this type (Switch progress etc) that is immune to “system errors” and “operative mistakes”?

Point 2 in table 3 – Why would consumers build up significant debt during the process of switching supplier? How long will this take? What systems are in place to ensure this is a smooth process?

Table 4 – Credit and top ups. Is there the likelihood of a system being developed that reflects Pay As You Go mobile phone top ups in that, if you purchase a regular, minimum or set amount of credit, you build up bonus reserves of minutes texts and data? Could the PPM top up system build up emergency credit or general credit in this way?

Self cut-offs – I would hope that the SMART element of the new meters allows suppliers to and would actively encourage them to, monitor self cut-offs as is mentioned in Appendix 2, 1.8. It would be cost effective for suppliers to avoid intense negotiation, debt recovery and complicated administration through actively monitoring such negative consumer practices.

Will the overall costs of pre-payment be brought into line with more typical payment methods? Currently pre-payment users are penalised financially with higher costs for using this payment method.

Appendix 2 – PPM users should always reserve the ability to pay by cash.

3.19 – Situations change. As an example, if a customer selects to pay by mobile phone and, due to financial difficulty cannot afford to keep the phone, the point above is ever more relevant.

What training do energy supplier staff receive that allows them to identify customers that are vulnerable or at risk? And how does this training inform the are customers assessed in terms of the Safe and Reasonably Practicable Guidance and switching to and from PPM?

I hope this add something.

Kind regards

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