

Comments on Ofgem statutory consultation on prepayment meters – Coventry Citizens Advice

- Might Ofgem consider reviewing the ‘sunset clause’ now that the date for smart meter roll out has been put back?
- We take on board the issues around criteria, proof and your proposal to have a method of appeal during which fitting is suspended. For your information, what we do here with identifying vulnerability in those with council tax liabilities, as a prelude to recovery, is to have simple rules around identifying ‘potential vulnerability’ (the reasonable suspicion of), to identify this potential vulnerability and then to suspend recovery action until a trusted third party (eg advice agency worker) has been given some time to prove or otherwise actual vulnerability. This has proved effective and might be something worth considering.
- Thirdly, vulnerability does not excuse liability – vulnerabilities must be respected in the way people are treated but if they are liable the liability must be dealt with. This is only a controversial point if the energy industry assumes advice services/clients are going to use the vulnerability rules to avoid client liabilities – but some do believe this so the point is worth making.

Beyond these points we agree with the diagnosis of the problem in the report, the objectives and, by and large, the measures (we responded more fully to the previous consultation exercise). We have issues with the level of the cap and the potential for shifting costs to the consumer/other consumers through other mechanisms. Consequently, we would also urge Ofgem to focus on monitoring, review and reporting of progress through its Social Obligations report. Apart from that, and the questions over the issue of ‘transfer objections’ which, again, may have detrimental unintended consequences, we are satisfied that the proposals are sound and positive.