

Changeworks' response to Statutory Consultation: Extending protections for non-E7 restricted meter customers (SLC 22G)

Changeworks is a Scottish environmental charity, supporting householders to achieve an affordable, low carbon lifestyle. We have offices in Edinburgh and Inverness. As an organisation we operate two of the Home Energy Scotland (South-East and Highlands and Islands) advice centres and have a number of in-house affordable warmth advisors delivering face-to-face support across Scotland. We therefore have a great depth of knowledge of householders' experiences and challenges with restricted meters. The organisation has also recently completed [research](#) into restricted meters in the North of Scotland, focusing specifically on Total Heating Total Control. This research was funded by Scottish Government's Improving Consumer Outcomes Fund and engaged a number of agencies across Scotland. The findings of this research and experiences of Changeworks' staff have been used to inform our response to the consultation.

Extension to term of compliance

Changeworks welcome the proposed extension to compliance under SLC 22G and the option to extend further without consultation. As per our research findings, while the smart meter roll-out may offer solutions to some of the challenges experienced by restricted meters, consumers need to continue to be offered the regulatory protection that the SLC 22G currently offers until the infrastructure is in place to enable ease of access to the wider market.

However, we also believe that this is an opportunity for Ofgem to make the SLC 22G more robust and impactful to ensure suppliers are proactive in supporting these consumers.

Active communication and awareness raising

As noted in the consultation (para. 23), there has been little switching reaction following the implementation of SLC 22G. We believe this is because the emphasis on establishing awareness of and accessing the most affordable tariff for DTS customers is still placed on the consumers themselves (who are often vulnerable) and the advice organisations who support them; taking-up considerable time and resource.

Instead, we believe the wording of the SLC 22G needs to go further, placing more responsibility on the supplier to communicate the options to their DTS consumers. This should include contacting consumers to:

- Provide details of their energy profiles and offer support to those who do not seem to be using their heating system effectively or signpost them to an advice organisation for support.
- Explain which of their alternative tariffs (single rate or other alternative) might be most suitable to them (based on their energy-use profile) and outline the savings that are possible for each individual household.
- Indicate that other tariffs are available with different suppliers and refer to an appropriate organisation for switching support.

To support this, there should be guidance given on the need for suppliers to use clear, accessible and consistent terminology in these communications. Training should be given by suppliers to customer service operatives so that their staff are able to notify new / existing customers as to the options available to them at each point of contact.

As per our previous feedback (para. 27), it would also be beneficial for Ofgem to raise awareness of SLC 22G to consumers and advice organisations. In addition, the ombudsman and complaints procedure should also be explained, so that there is a clear route to recompense should a supplier be found to be in breach of SLC 22G. This would also support Ofgem in identifying any breaches, reducing the risk of wider, undetected consumer detriment.

Support for pre-payment meter consumers

The current provisions do not extend to consumers on pre-payment meters (PPM). While we are aware that the solution is not as straight forward, these consumers are often the most vulnerable and arguably the group that would benefit most from the support of such protections. With a projected average saving of £154 per year (para. 12), a lack of protection for these consumers and the delayed smart meter roll out could result in them losing out on a typical saving of £770 over this five-year period.

Changeworks believe that SLC 22G should be expanded to include PPM consumers affording them the same opportunities to access the open market. Possible solutions to support this could be:

- The offer of a more competitive multi-rate tariff to suit the existing metering arrangement.
- A rebate.
- An additional Warm Homes Discount support package for DTS PPM consumers.

In addition, Changeworks suggest that SLC 22G should include a clause that would see suppliers prioritise PPM DTS meter consumers in the smart meter roll-out to enable them the opportunity to access the wider market sooner. This should be accompanied by an explanation as to the alternative tariffs available to them, support to help them find the tariff most suited to their energy-use profile / heating system and the associated savings.

Clarifications on smart meter roll-out

In relation to the smart meter roll-out, Changeworks would like to see clarification on the following aspects from Ofgem with regards to SLC 22G:

1. When will twin-element/5-terminal meters be readily available?
2. If current DTS consumers had a twin-element/5-terminal meter installed, will they be able to access the open market, or will the same issues arise?
3. With regards to the phase out of Radio Tele-Switching, what will the options be for those who have not moved to a smart meter? How will their heating and hot water systems be activated and what protections will be available to them?

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