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Dear Anna Rossington,

Citizens Advice Response to Ofgem's Statutory Consultation – Extending protections for non-E7 restricted meter customers (SLC 22G)

This submission was prepared by Citizens Advice. Citizens Advice has statutory responsibilities to represent the interests of energy consumers in Great Britain. This document is entirely non-confidential and may be published on your website. If you would like to discuss any matter raised in more detail please do not hesitate to get in contact.

Citizens Advice welcomes Ofgem's proposal to extend SLC22G, and introduce a new provision to be able to extend the protections further if needed. It's essential that these consumers are not disadvantaged by delays to the smart meter rollout.

It's important that consumers are able to make an accurate comparison to understand if switching to a single rate will be beneficial for their circumstances. At present, we are not aware of price comparison websites that can facilitate these complex tariff comparisons for all restricted meter customers. In the absence of these services, suppliers need to assist consumers to take extra steps to help compare their options, and ensure regular signposting to third parties who may be able to help.

Good information is not only needed to assess switching, but also to make most use of their existing tariff. In our report [False Economy](#)¹ we found only 26% of customers on Time of Use tariffs were confident on their heating hours. Ofgem should ensure that suppliers are now providing better information on how to maximise the benefit from these tariffs, in line with the 'encouraging and enabling engagement' limb of its customer communications principles.

¹ Citizens Advice, [False Economy](#) (Sept 2018)

Knowledge of the remedy is low and the Citizens Advice consumer service is still receiving cases where the supplier doesn't inform the consumer of their rights under SLC22G, for example consumers are told they can't switch supplier or tariff as they are on a restricted meter.

Sam changed their heating from storage heaters to central heating. They called their supplier to arrange for their meters to be switched from a non-E7 restricted meter to a single rate meter. The supplier said there were no available engineers for months, and that they would have to wait and stay on the restricted tariff for the engineer to change their meter before they could switch suppliers or tariff.

The consumer service has also seen cases where consumers have switched to a single rate with another supplier and had bill issues, or confusion over how the bill has been produced. Suppliers need to be able to understand the unique situation of consumers with restricted metering arrangements, and be able to accurately show how they are billing them on a single rate.

To tackle these issues, we think an assessment of a suppliers knowledge of the remedy, and ability to take on restricted meter customers under a single rate arrangement, should be included as part of the new threshold assessments proposed in the Supplier Licence Review². We also welcome the recent compliance activity by Ofgem in relation to a supplier that had not met its obligations in this area.³

In the longer term, the rollout of smart meters should remove the need for the remedy for most customers. However, there will be a portion of customers who are in areas that the smart metering infrastructure does not reach or whose property types prevent the successful installation and use of smart meters. As such this will remain a relevant issue for some consumers even after the smart meter rollout has concluded for the majority of homes.

An emergent issue starting to be seen through our consumer service is where suppliers are unable to replace broken meters with a similar legacy meter. Affected consumers are unable to choose not to have a smart meter installed, and for some with more complex metering set ups there are no equivalent smart metering solutions currently available. For those who cannot have smart meters, their restricted meters will still need to be replaced once they are outside of their

² Ofgem, [Statutory Consultation – Supplier Licensing Review: Ongoing requirements and exit arrangements](#), (June 2020)

³ Ofgem, [Ofgem closes compliance engagement with Bulb](#) (August 2020)

certification period, and there may need to be a form of enduring protections for these customers after the “completion” of the smart meter rollout.

There is also likely to be a portion of customers who are currently on restricted meters who do not want a smart meter⁴. Suppliers will need to sensitively engage with restricted meter customers who have concerns around smart metering and seek to assuage these concerns by offering consumers some choice as to how they will operate and assure them of the benefits smart meters will offer.

Yours sincerely,

Alice Brett,
Senior Policy Researcher, Citizens Advice

⁴ Our report [Clear and in Control](#) (Dec 2019) found 44% who didn't already have a smart meter wouldn't want one installed