

**Citizens Advice response
to The Commission for
Customers in Vulnerable
Circumstances
CALL FOR EVIDENCE**

May 2018



Overview

Citizens Advice welcomes the opportunity to respond to this call for evidence on vulnerability in the energy market. We should start by recognising the progress that has been made by the industry in this area over recent years. Through initiatives such as the Energy UK safety net, the prepayment commitments and investment in customer service we have seen a recognition by the industry of their social obligations as providers of an essential service.

The significant increase in the number of new providers entering the market has brought new challenges to this consensus. Some have entered with express objectives to help vulnerable consumers while others have simply sought to compete on price. We believe more can be done to reinforce obligations around vulnerable customers at the point companies enter the market but also see an important role for this commission in re-establishing a consensus around the responsibilities of an energy supplier.

However the major challenge for the industry now lies in closing the gap between the help that most suppliers are willing to offer and those that need it. Our recent research into the problem of self disconnection found that 9 in 10 households who could not afford to top up their meter contained a child or someone with a long term health condition. We know that most suppliers will now offer help with topping up if requested and that this vulnerable group would be treated as a priority. However just 9% of these households had contacted their supplier.

This disconnect between help on the one hand and those that need it on the other is also evident in other areas where customers most need support. The priority services register, ECO, Warm Home Discount and smart meter support are all examples where suppliers are willing to provide help if asked at the right time and in the right way. However too often the barriers involved in the process mean people go without. This is also true when it comes to engagement with the energy market more generally where the vulnerable consumers most likely to suffer detriment from high prices are the ones paying them.

It is time for all of us to think how we can bring help closer to those who need it. In particular, how we can make asking for support and engaging in new opportunities easier for those who would benefit most. An important first step would be the creation of a clear set of meaningful commitments from the industry to the consumer on how suppliers will respond if and when people ask them for help. This would give people confidence that reaching out will be worthwhile. We hope the commission will consider how this can be achieved.

1. Are the areas of vulnerability identified in this call for evidence the correct areas for the commission to focus on?

We agree that the areas you have listed should be included:

- Financial vulnerability
- Transient/life events
- Mental health
- Physical health/disability
- Wider vulnerable circumstances

The Ofgem definition of vulnerability is based on a consumer being less able to represent their interests or more likely to suffer detriment. It is important to remember that this criteria can apply to anyone at a given point in time.

Depending on the situation, there are a vast number of different circumstances and characteristics that could make someone more likely to suffer detriment. However it is also clear that some characteristics will make a customer more likely to suffer detriment in a range of interactions with their energy supplier.

We are glad to see financial vulnerability given prominence for this commission. Our data shows a clear link between low or insecure incomes and falling into difficulties with bills. In the year to last July, we supported more than 30,000 people with more than 48,000 Universal Credit issues. Analysis of our caseloads show that those transitioning onto the new benefit are 1.5 times more likely to need help with debt as those on legacy benefits¹. Our research into insecure incomes also found that 83% of advisers saw a link between fluctuating incomes and debt.²

A focus on mental health is also very welcome, as this is an area of vulnerability that has not been given the attention it deserves in the past. Over the past few years, regulators have increased their focus on vulnerability. But at the same time, local Citizens Advice have seen a 15% increase in consumer, utilities and telecoms issues for clients with mental health problems - while there has been no change in consumer issues for our clients overall.³

We would like clarity that groups normally considered vulnerable when it comes to energy supply will also be considered, namely households containing elderly

¹ Citizens Advice, [Delivering on Universal Credit](#), 2017

² Citizens Advice, [Second Choice Jobs](#), 2015

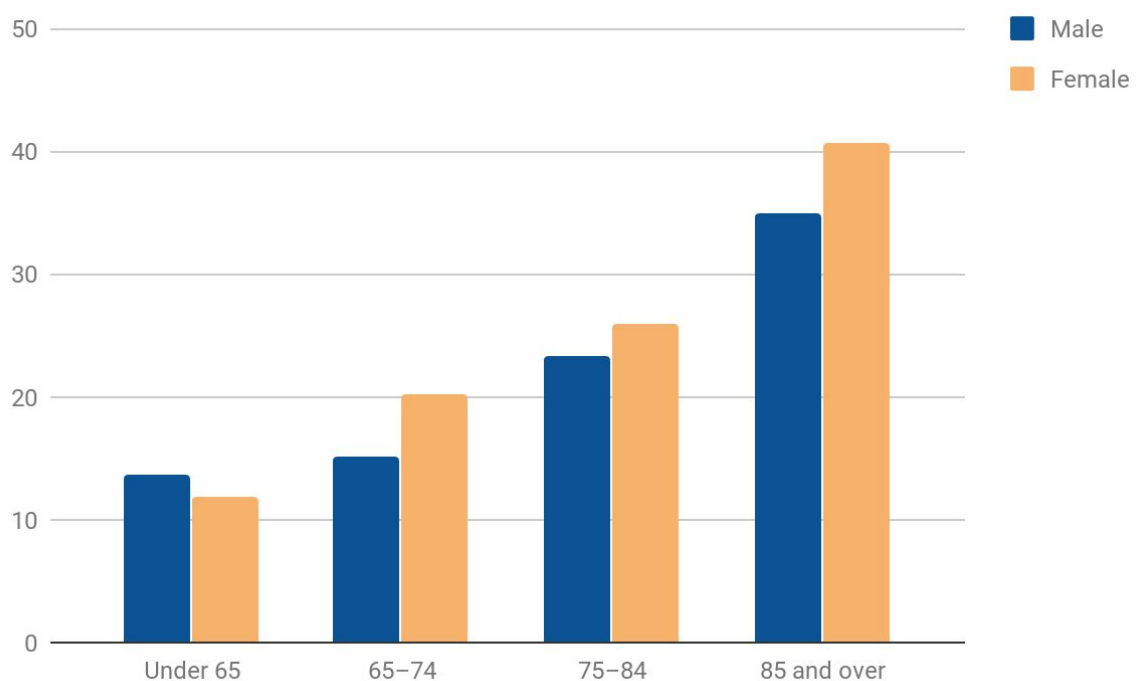
³ Citizens Advice, [Joining the Dots](#), 2017.

people or young children. Energy consumers are at their most vulnerable when they are at risk from an insufficient supply of energy to their homes.

There have been many studies of the risks of cold homes and who is most exposed to them. Probably the most thorough in recent times and the one still used by government is that led by Professor Marmot in 2011⁴.

This study concluded that there were significant negative effects of cold homes on infant development, the mental health of adolescents, the physical health of adults with pre-existing conditions and the health and mortality of elderly people.

Figure 1. Excess winter death index by age group - 2014/15⁵



The chart confirms that those over 65 years old are more vulnerable to winter deaths. Within that group however we see that 75-84 year olds are more than twice as vulnerable in the colder months than other people and those over 85, four times more likely.

We would therefore like to see the commission maintain a focus on those at risk of the most substantial detriment in the energy market.

⁴ Marmot Review Team, *The Health Impacts of Cold Homes and Fuel Poverty*, 2011

⁵ ONS, *Excess Winter Mortality Statistics*, 2015

2. In your experience how can particular vulnerabilities impact a customer's ability to interact with their energy supplier?

Barriers to communicating with suppliers as a result of a disability have been recognised for some time in the energy sector with the licence conditions around the priority services register being one attempt to address these. Recently however the industry has become more sensitive to the actual needs of customers in these situations, recognising for instance that traditional solutions such as braille bills may not always be the best solution for a particular customer⁶.

Barriers that customers experience due to poor mental health are less well recognised by the industry although there have been attempts to change this recently. Previous research conducted by Citizens Advice found that when people are experiencing a period of poor mental health:⁷

- 78% felt anxious about speaking to people face to face
- 72% felt anxious about speaking over the phone
- 60% felt anxious about opening post, and 72% find it more difficult than usual to manage or complete paperwork

This shows a very clear relationship between poor mental health and anxiety about using a range of channels to communicate with essential service providers. Sometimes however the causes of this anxiety can be less clear. As has been recognised in the call for evidence, significant life events can reduce the time and energy that people have available to sort out a problem with their supplier. Others may just lack confidence in their ability to get their point across or that suppliers will listen if they try. Outlined below are some examples of customers struggling to get their point across for a variety of reasons. We think these provide important context as the commission considers this question.

Case Study 1

The consumer had mental and physical health problems and had been hospitalised before. She was in receipt of Employment & Support Allowance, Disability Living Allowance and Carers Allowance. The consumer was off supply for electricity as she could not afford to top up her prepayment meter until her next benefits payment in 2 weeks' time.

⁶ Ofgem, [Priority Services Register Review – Final Proposals](#), 2015

⁷ Survey conducted by Comres on behalf of Citizens Advice, March 2017. Base: 1000.

She had contacted her supplier but felt they treated her poorly and offered no assistance. She had also recently been declared bankrupt and believed the supplier was still collecting debt from her prepayment meter.

After the EHU took up the matter the supplier provided a top up credit for £30 as a goodwill gesture and apologised for not helping when she called. It was confirmed there was no debt on the electricity meter however, there was still a debt on the gas meter. The supplier advised their litigation department was dealing with the gas account and that once it was cleared any overpayments would be refunded.

(Extra Help Unit 2018)

Case Study 2

The consumer was in receipt of Employment & Support Allowance and had multiple health conditions including anxiety, depression and post-traumatic stress disorder. He was struggling financially with multiple debts and a balance of £1900 had accrued for gas and electricity.

He felt that his supplier was intimidating and harassing him to pay the balance despite him being in financial hardship. The supplier was sending agents out to chase the debt and he felt they were also pressuring him to have a smart meter installed.

The supplier confirmed the consumer was on their priority services register. Additional support had been offered for example signposting for debt advice and to apply for their trust fund. An alternative tariff had previously been offered.

An internal team providing extra support had proposed a payment plan at a minimal amount of £5 per week however, he had been unable to agree this and could not afford his ongoing usage. A home visit had been arranged to discuss the situation however, the consumer had been unhappy with this and would not engage.

The supplier confirmed they would not install a prepayment meter given his circumstances and maintained the offer of a payment plan at a minimum of £5 per week. A referral was made to a 3rd party organisation for further assistance regarding his situation and finances.

(Extra Help Unit 2018)

Case Study 3

The consumer had learning difficulties, was epileptic and had a heart condition. He received Personal Independence Payment.

He transferred to the supplier concerned so that he could get a smart meter. This was installed but there had been issues with the supplier receiving meter readings.

The supplier initially advised there was an issue with the signal however, the consumer disputed this as he was able to receive other signals in the household. He believed the issue was down to a fault during installation as he understood there had been an issue with the fuse.

*The consumer was unable to read the meter himself due to being dyslexic. Following the EHU complaint the supplier confirmed there had been an installation error when the meters were first installed. The meters were replaced as an emergency. The consumer was added to the priority services register.
(Extra Help Unit 2018)*

Case Study 4

The consumer was of pensionable age with arthritis and poor eyesight. Her electricity meter was located at ceiling height and she would need to stand on a chair to reach this. She was on the PSR and meter readers had attended however, estimated reads were still being used on the account. When querying this with the supplier she was being asked to take meter readings, which was not possible for her.

*When the EHU investigated a liaison officer from the supplier attended the property and found one of the rates on the meter had not been advancing for an extended period. This had caused the meter readings to be rejected by the Supplier's billing system resulting in estimated billing for an extended period. The meter was exchanged and the billing corrected resulting in a credit balance of over £1,000.
(Extra Help Unit 2018)*

Case Study 5

The consumer had a smart meter fitted. In August it was installed incorrectly and it set on fire. It tripped her electric, breaking my boiler house alarm washing machine due to a surge of electric.

She logged a complaint, claiming for repairs and loss of earnings- she works as a childminder. I have had a voicemail from them today saying they are willing to pay less than 1/2 of what I'm claiming.

*The situation has caused an emotional and mental impact on her and her family. She really needs advice on what to do next and would like someone to ring her. She is emotionally and mentally scarred by what has happened.
(Citizens Advice Consumer Service 2018)*

3. What in your experience are the key things that commissioners need to understand in relation to particular vulnerabilities and how these might impact a customer's ability to engage in the energy market?

This is an area we have researched in some detail over the last few years. Below we summarise the findings of our recent analysis of the Ofgem engagement survey showing which groups are least likely to engage.

The CMA investigation painted a picture of a two tier energy market - with a section of society getting good value from the market by pursuing the lowest prices, while the vast majority of consumers were left paying around £330 more for exactly the same product.

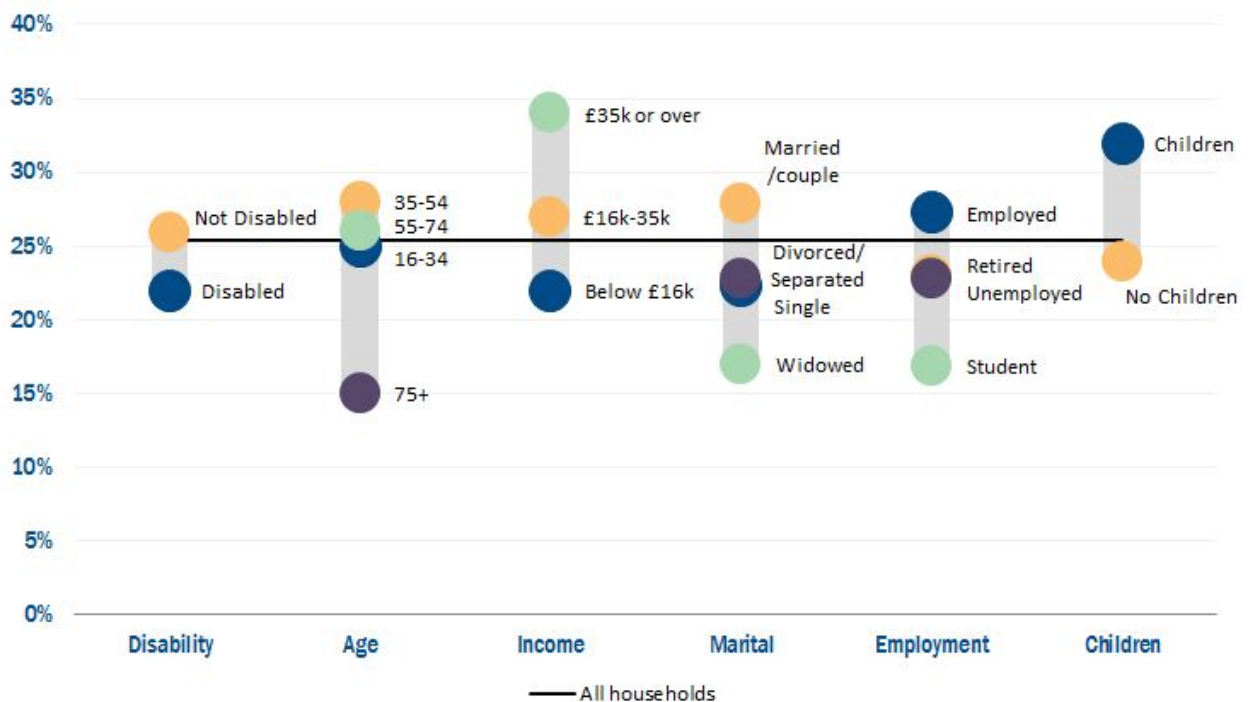
This sense of unfairness was deepened by the results of the CMA's consumer survey which found that the routes to a good energy deal, via price comparison websites or direct negotiation with a supplier, meant that people in certain situations found it much harder to achieve. This meant those paying the highest prices were more likely to be those who would suffer most as a result - households on low incomes and vulnerable (elderly, disabled)⁸.

Our analysis of Ofgem's most recent engagement survey data⁹ shows this trend continuing with the same groups less likely to engage. Figure 2 below shows poorer, older and disabled consumers are more likely to be paying a higher price for energy. Students and widowed people also seem to fare particularly badly in the market. Households with children or those earning high incomes are the most likely to switch. Lack of engagement becomes particularly pronounced for consumers over 75.

⁸ <https://tinyurl.com/yafrb39c>

⁹ <https://www.ofgem.gov.uk/publications-and-updates/consumer-engagement-survey-2017>

Figure 2. Percentage switched supplier or tariff in last year by circumstance



This does not of course mean these characteristics prohibit someone from engaging but the significant differences in engagement levels suggest that people in these situations are facing barriers to getting a good deal in the market. This analysis also only covers the circumstances covered by Ofgem’s survey. We would like to see further exploration of what people in these situations have in common, who else might be experiencing similar difficulties and how their barriers could be addressed.

4. What key trends should commissioners be aware of?

In this section we highlight some of the key issues that we consider to be priorities for improving the outcomes for vulnerable energy consumers.

Self disconnection

Our recent research found that self-disconnection is a chronic problem for a significant minority of PPM users. We found that 16% of consumers with a prepayment meter (PPM) are running out of credit on their meter each year. This is the same as in 2014. Our research shows that around 140,000 households could not afford to top-up their PPM in the last 12 months. 50% said that keeping their PPM topped up and connected is a major daily concern. Most of

these households (88%) contained a child or someone with long term health issues. 87% of these households were on benefits.

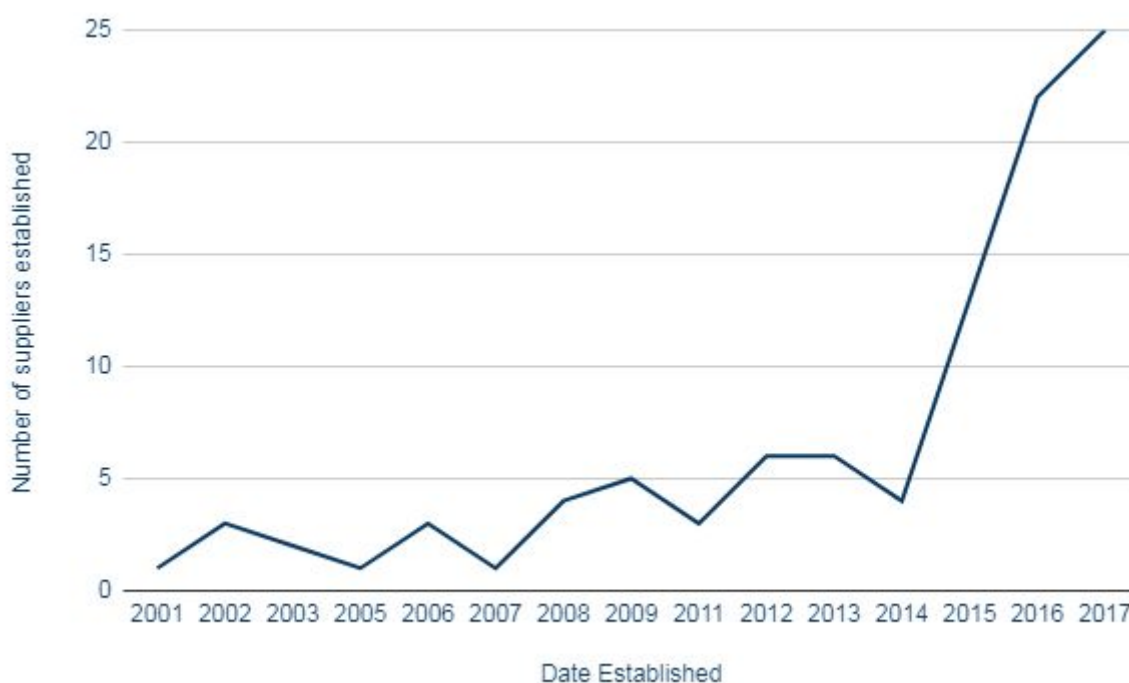
One of the concerning findings is how few customers, who are struggling to top up their prepayment meter, are turning to their supplier for help. Only 9% of these households had contacted their supplier for help. 22% of those who could not afford to top-up contacted someone in authority (8% of all those who had self-disconnected), 11% contacted a job centre. 7% contacted Citizens Advice. This can be compared to 33% (of those citing affordability) who used a blanket or hot water bottle to stay warm (42% households with children, 53% elderly people) and 47% who borrowed money from friends or relatives. Our advisers also tell us that cutting back on food and heat, or borrowing money from friends and family are the most likely responses to those struggling to top up their prepayment meter.

In April 2013, responsibility for delivering discretionary emergency welfare was transferred to local authorities in England, and the devolved governments in Scotland and Wales. Not all schemes provide support with fuel costs and application processes can be difficult. Some privately-funded schemes have emerged, like the nPower Fuel Bank™ which provide emergency fuel vouchers to PPM users who are in crisis and British Gas Energy Trust which will clear debt for those who are struggling. These schemes provide welcome support for consumers but their coverage is patchy. Schemes often operate under restrictive criteria, meaning consumers may have to contact multiple organisations to access help and assistance.

New suppliers

There are over 65 domestic and 60 non domestic energy suppliers in the market and new entrants, in general, have introduced innovative practices and improved the state of competition. Figure 3 shows how quickly new entrants have increased.

Figure 3. The number of energy suppliers established by year¹⁰



Through our work, we've identified that a minority of newer entrants lack suitable skills, experience or financial capital to operate a business that is providing an 'essential for life' service. Some have also pursued low cost business models that have restricted availability of customer service support. Examples of detriment caused by poorly prepared suppliers have included mis-selling, failure to accurately bill consumers, long wait times to get through to customer service agents and prepayment meter users going off supply for extended periods of time due to failures in supplier processes. This detriment will clearly be more acute, becoming quite serious, for customers already in vulnerable situations.

Smart and new technology

Smart meters, and the products and services they enable, have the potential to improve outcomes for consumers in vulnerable situations. The innovation and flexibility that smart meters bring should transform the prepay market, making it an attractive option to all consumers. If the stigma that has traditionally been associated with prepay energy is removed, smart meters will have certainly delivered for large groups of vulnerable consumers.

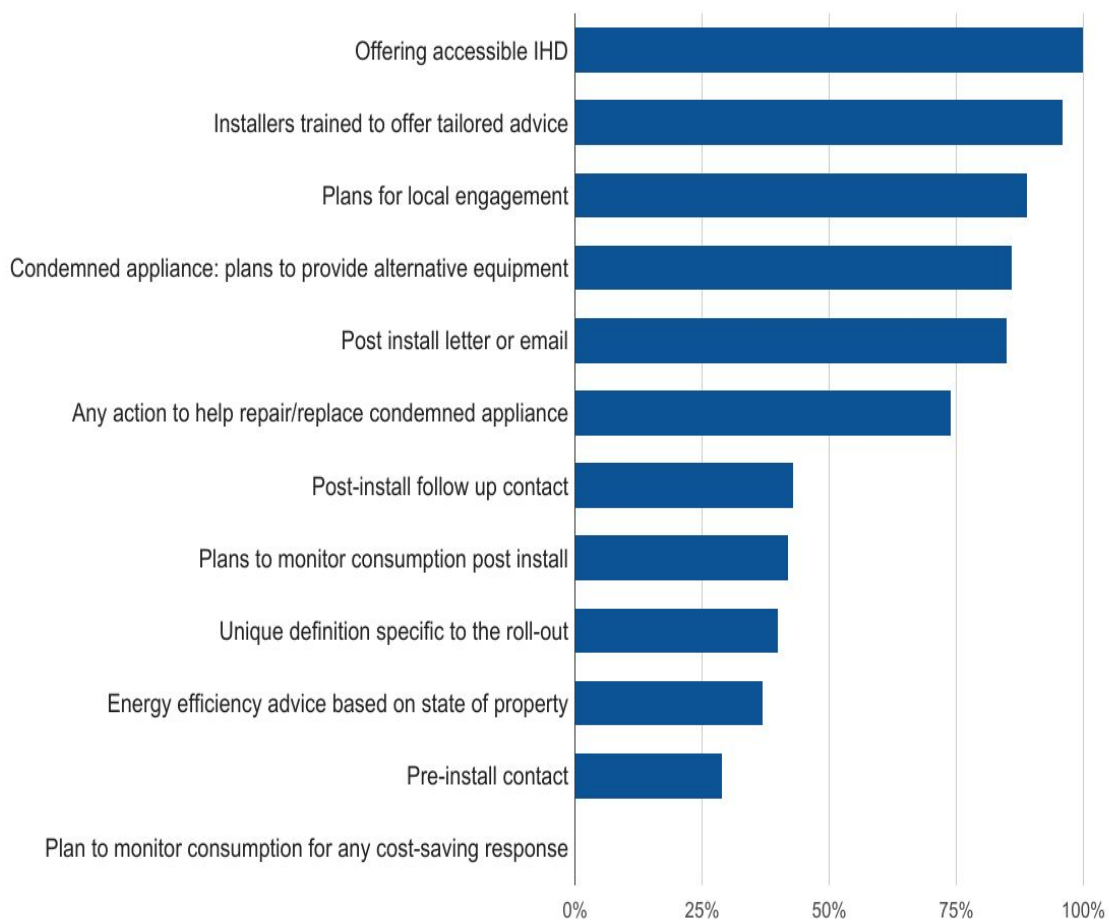
Time of Use tariffs give consumers a chance to plan their electricity consumption to lower-priced hours and save money - this could be a huge help to fuel poor households. But these tariffs won't work if industry, the regulator and

¹⁰ Based on data collected by Citizens Advice from suppliers and Companies House

government get the transition wrong. Without a clear and concerted focus on customer engagement and communication, the tariff transition will not be successful.

It is vital that as smart meters and subsequent offers are introduced, that everyone is given the information and support to make the most of those offers. There is a danger, in the rush to start realising some of the benefits of new technology to the wider market, that the needs of those households facing barriers to engaging with it become an afterthought. Unfortunately our research last year found that to be the case in the smart meter rollout. Figure 4 below shows a patchy and inconsistent level of support being offered during and after the installation.

Figure 4. Percentage of market offering each service in smart meter roll-out - some selected services



It should be said that the situation with regards support for vulnerable consumers in the roll-out has improved through a concerted effort of the industry and government. However these findings do highlight the risk that some consumers could be left behind as the market reforms. In our view the success of these reforms depends on their impact on the outcomes of vulnerable consumers.

5. Can you share any examples of best practice to support customers in vulnerable circumstances, either within energy or other relevant sectors?

Below we summarise some examples of good approaches to vulnerability that we have found in recent research into supplier practices.

Self Disconnection¹¹

Check if a PPM is still safe and reasonably practicable: Self-disconnection poses a health and safety risk to consumers, particularly if consumers are self-disconnecting regularly. Suppliers should therefore take the opportunity to reassess whether a PPM is still safe and reasonably practicable and, if appropriate, arrange an alternative payment method.

Additional good practice: We have also seen suppliers demonstrate good practice that may not be applicable to all consumers who self-disconnect. These provide additional useful learnings:

- Signpost to local councils for welfare assistance.
- Signpost to local food banks.
- Advise on how to use and manage a prepayment meter: standing charges, emergency credit and friendly credit facilities.
- Bring forward meter exchange appointments.
- Install a smart meter.
- Exchange a prepayment meter for a credit meter.

Customers in Debt: If a consumer is in debt to their energy supplier and struggling to keep up with repayments, they may also be eligible for a grant from an energy trust fund. All of the largest energy suppliers have their own trust funds that their customers can apply to. In addition, the British Gas Energy Trust, EDF Energy Trust and E.on Energy Fund are open to all energy consumers,

¹¹ Citizens Advice - [Good Practice Guide - Holistic Support for Users](#) 2017.

regardless of who their supplier is. Some consumers may need additional support to make an application.

Our research found that advice on prioritising debts is particularly important for PPM users. Consumers with multiple debts often self-disconnect because they prioritise other payments such as rent and council tax arrears, credit cards, catalogue debts and loans. Where this is the case, it is important to explain to the consumer which debt is a priority. Priority debts are those with the most serious consequences - like being evicted or getting a court fine. A resolution might involve setting up an affordable debt management plan or applying for a debt relief order.

“They might prioritise their credit card because they use it for food... it’s about explaining what is a priority payment.” Adviser - Coventry Citizens Advice

Money management: Our research shows that PPM users who are financially constrained tend to budget by putting a fixed amount on the meter whenever they get paid. They monitor their usage carefully and cut back as much as possible. When the credit is used up, they self-disconnect until the next payday.

Advisers encourage people to plan ahead for increased consumption in the winter so that they are less likely to self-disconnect. In particular, they encourage people to keep topping up their gas meter even when they are not using it over the summer. This helps ensure standing charges do not build up, and helps the consumer build up a reserve for the winter.

Smart meters bring other opportunities to help PPM users manage their budget. Several clients we spoke to as part of this research said they would like a smart PPM to help manage their usage. Research by CSE shows that features like Historic Usage, Target Setting, Debt Balance and Credit Alerts on smart PPMs can help consumers to budget and change their energy consumption. For example, they can remind consumers to top up over the summer. The same research also shows that home energy advice visits are important for showing consumers how to make best use of these features

Avoid PPMs if unsafe

A PPM is not safe and reasonably practicable if there is a serious risk to health from self-disconnection or extensive self-rationing. This includes cases where the consumer, or another member of the household:

- has a health condition that is made worse by living in a cold home, or
- uses medical equipment that requires an electricity supply

In these cases...

Debt repayment options: Suppliers are required to offer a range of payment options to customers in payment difficulty:

- payment by regular instalments through means other than a PPM, e.g. direct debit
- payment by direct deductions from welfare benefits (Fuel Direct)
- payment through a PPM, where this is safe and reasonably practical

Referrals¹²

Suppliers should do what they can to help and support consumers themselves while recognising when a third party is better placed. There are many ways that suppliers can help and support consumers in vulnerable situations in-house, including:

- cheapest tariff checks
- voluntarily billing customers on cheaper tariff rates
- discretionary prepayment top ups
- flexible support with managing debts

By delivering a consistent message in the right way, consumers are more likely to take up offers of help when they need and want it. Suppliers should endeavour to make all customers aware of third parties that can offer additional help and support should they need it. The help available from third parties should be promoted consistently across all communication channels, such as letters, telephone, the supplier's website, and increasingly, apps.

Suppliers should give staff the tools they need to make good referrals. Suppliers should allow agents time to have the right conversations with consumers. One supplier we spoke to does not time calls at all, while others have flexible KPIs so that agents can take longer than normal if needed. It can also be helpful to provide visual prompts and reminders of the different organisations that agents can signpost or refer customers to. This can range from 'vulnerability cards' attached to computer screens to pop up dialogues integrated into the CRM system.

We recommended suppliers work constructively with a range of referral partners. We also discussed the need to support consumers up to the point of referral, and sometimes beyond, in order to help them access services. But

¹² Citizens Advice - [Good practice guide: How energy suppliers can signpost and refer vulnerable consumers to the right source of help](#) 2017.

equally, suppliers should not penalise consumers who are not in a position to accept help.

Smart meter installations¹³

Our research into supplier practices for smart meter installations revealed a range of innovation and good practice. The approaches here could be replicated in other areas of vulnerability.

Defining and identifying

Positive progress has been made in adapting **definitions** and processes within industry. Some techniques which have been used to do this include:

- **enhancing the definition of vulnerability** - some suppliers have built on the content of Ofgem's Vulnerable Consumer Strategy to broaden their definition of vulnerability specifically for the roll-out. For example, one supplier has included characteristics such as housing tenure, internet access and the energy efficiency of the property in their definition.
- **engaging with charities and other organisations to develop insights into different forms of vulnerability**. As a starting point, some suppliers have used relevant characteristics from the new PSR data-sharing codes to develop definitions. From this, one supplier has collaborated with organisations who have expertise in particular forms of vulnerability. This knowledge has been transferred into developing a stronger definition and subsequent improvements to their smart meter offer.
- **analysing gaps in developing insights** - some suppliers are conducting a gap analysis with their existing partners to consider which vulnerabilities need further examination and where there is potential for new partnerships.

Identifying vulnerability can prepare suppliers for how best to communicate with the customer. Good practice in this area includes:

- **training staff to recognise vulnerability** - One example is a 4 hour face to face training session alongside annual e-Learning courses. Many suppliers also now have systems in place to ensure this information is shared reliably across the organisation.

¹³ Citizens Advice - [Smart Support: A Good Practice Guide](#) 2017.

- **using established scripts or conversation guides when conversing with customers** - these are designed to elicit information about the specific needs of customers. Ultimately, this information allows suppliers to alter any ongoing engagement they have with the customer, to best suit the consumer's circumstances.
- **creating platforms for customers to self-identify any vulnerabilities** - most suppliers recognise the importance of allowing consumers to register their own circumstances and have digital platforms for customers to do this. Some suppliers have also provided pre-installation literature, which reminds consumers to self-identify any needs they have.

Engaging

Some good approaches include:

- **engaging with customers early and applying their understanding of specific needs to their smart meter offer**- For example, some suppliers recognise there may be language barriers during the roll-out. One supplier has begun collecting information through their customer survey, to provide evidence of which languages are prevalent within their customer base.
- **building relationships with organisations such as local authorities, housing associations, charities, Smart Energy GB and Registered Social Landlords** - these relationships allow suppliers to identify specific types of vulnerability and engage appropriately. Furthermore, partners can help suppliers to raise awareness of the smart meter rollout. One example includes a registered social landlord who sent dual branded engagement letters to their tenants. One medium sized supplier uses their default supplier agreements with housing associations to install smart meters.
- **using local community centers as a point of contact for customers** - this offers the consumer familiar surroundings in which to discuss any smart meter related issues. One supplier did this through an existing project they were involved in. SEGB have funded a programme to train all frontline Citizens Advice staff to ensure they can support consumers as the rollout progresses.

Pre-installation

Before installing a smart meter, most suppliers have processes in place, which are intended to make the installation go as smoothly as possible. Companies are already adapting these processes for vulnerable customers, to include:

- **using identified knowledge to adapt how an appointment is made** - for example, one supplier is trialling appointment booking forms for deaf customers to fill and return. This could be extended to other important exchanges of information, such as data sharing consent.
- **a series of warm up communications in different formats to prepare consumers** - these range from appointment confirmation texts to sending consumers literature related to the smart meter or contacting the consumer by phone the day before the appointment. One supplier also plans to use their customer relations team to conduct home visits for some vulnerable customers prior to installation.
- **offering vulnerable consumers a dedicated point of contact** - assigning a single member of staff who to help these consumers through the installation process, including contacting them before and after the installation.
- **producing easy to understand videos** - these videos introduce smart meters to the consumer ahead of the installation and explain how they can be more energy efficient. It allows those who may struggle during the installation process to engage with information in their own time and in a different format.
- **offering fixed/flexible appointments** - understanding the needs of the customer may mean one is more appropriate than the other. This will differ with circumstance. Some suppliers offer fixed appointments for customers with a medical dependency on electricity or if a nominated person/carer is required, making the appointments more manageable.

Installation

Despite processes being in place, sometimes vulnerabilities are not identified prior to the installation. In such cases, there are examples of how industry can effectively anticipate and deal with these situations. Some suppliers are:

- **ensuring their installers provide tailored advice** - one supplier trains installers to explain their IHD in different ways, depending on the needs of the customer. Some suppliers adjust their advice based on their situational knowledge, gained throughout the process. Others will use knowledge gained on site to give energy efficiency advice based on the consumer's property characteristics. Furthermore, one supplier is collaborating with their external partners to explore how best to tailor advice.
- **giving literature to the consumer on the day, which signposts to other sources of information** - in one example, the literature points

them in the direction of an online support tool the supplier has designed. Others use relationships with energy charities to provide further advice.

- **monitoring third party contractors** - some suppliers who choose to outsource smart meter installations are able to retain information about potentially vulnerable customers through regular reports, which are requested from the contractor. Other suppliers are considering adding performance indicators, such as handling vulnerability, into their contract. Good performance may be rewarded, whereas unsatisfactory performances may lead to financial penalties.

Post-installation

Some effective examples of post-installation engagement include:

- **follow-up communication** - the majority of the market provide some form of follow-up communication. One supplier will call the consumer after 1 week and send a subsequent letter or email after 2 weeks. In addition to this, the same supplier is currently in the middle of a trial where they call consumers after 6 and 9 months to give further energy efficiency advice. Two suppliers will use information obtained during the follow-up telephone call to identify consumers who would benefit from a home visit.
- **checking smart meter functionality** - one supplier uses the follow-up call to check whether the consumer's IHD is displaying the correct tariff. This is useful for some vulnerable consumers who may need support in identifying or discussing issues.
- **looking for ongoing signs of vulnerability** - there are a range of techniques suppliers are using. Some plan to look at consumption patterns for signs of inability to pay and evidence of repeated self-disconnection.
- **preparing customers for the prospect of increasing bills after a smart meter installation** - one supplier is sending letters to consumers who have had estimated bills with their standard meter. The first communication is sent after the smart meter installation and explains the usage on the customer's standard meter from their last bill until the date of the smart meter installation. Such a communication could reduce the impact of a potential bill 'shock'. Another supplier reviews any bill post-installation that does not align with previous bills. These are investigated internally and, if necessary, the consumer will be contacted to discuss the issue.

Other info

Two other issues that we have not covered so far but would like to highlight are:

Our energy supplier rating

Our energy supplier rating provides consumers with at-a-glance information about the customer service they can expect from an energy company. Part of the rating is based on membership of voluntary schemes.

As part of our review of the rating in 2017 we were keen to introduce more consideration of the needs of consumers in vulnerable circumstances. To this end, we increased the proportion of the score based on voluntary schemes to 10% of the rating, and added new schemes/standards which are more relevant to vulnerable consumers. These are:

- Safety Net for vulnerable customers
- Energy UK PPM Principles
- British Standard on Inclusive Service Design (BS 18477)

The rest of the scoring for voluntary schemes is based on membership of the Energy Switch Guarantee (ESG). Suppliers currently score 3 points for membership of the ESG, and 1 point for membership of the other schemes (up to a maximum of 5 points).

If the Commission for Customers in Vulnerable Circumstances develops a new scheme/standard to go alongside (or replace) some of those already run by Energy UK, then we will consider amending this methodology to accommodate these changes.

We generally apply three tests to the inclusion of schemes/standards in the rating, and when determining their weighting:

- How far beyond existing rules in the supply licence (or elsewhere) the scheme/standard goes, and how much value this adds for consumers
- How accessible the scheme is to a range of suppliers, in terms of customer numbers and business models
- What compliance measures are in place, to ensure that suppliers meet the requirements of the scheme/standard they have signed up to.

We would expect to apply these same tests to any new scheme or standard developed as a result of the Commission's work.

Small businesses

We would like to see more provisions for people residing in business premises to be treated appropriately. We would expect suppliers to respond to the needs

of any consumers in vulnerable situations resident at a property, independent of whether the building is associated with a meter on a domestic or non domestic contract. For example, not disconnecting in winter if resident is vulnerable. Further, the commission could consider how the existing considerations of consumers in vulnerable situations, particularly regarding mental health, should be considered by suppliers of micro businesses.