

Energy Saving Trust's response to Citizens Advice Consultation: The Citizens Advice Draft Consumer Work Plan 2022/23

Citizens Advice draft workplan 2022/2023

We welcome the opportunity to comment on your latest draft workplan and hope we can continue to work collaboratively in progressing action towards addressing the climate emergency, towards a just transition to net zero and particularly to support consumers through the current energy price crisis.

Citizens Advice has a unique ability to look across the economy and use its rich insight to understand the true consumer experience and issues faced. When it comes to net zero, Citizens Advice's expertise and insight across the economy, and involvement across the energy system (from networks and systems, to retail and customer service, consumer experience and homes) enable it to make important links between policy agendas and join up the key issues for people such as advocating for greater consumer redress in new and developing technologies to drive consumer confidence.

Energy Saving Trust is an independent organisation dedicated to promoting energy efficiency, low carbon transport and sustainable energy use. We aim to address the climate emergency and deliver the wider benefits of clean energy as we transition to net zero. We empower householders to make better choices, deliver transformative programmes for governments and support businesses with strategy, research and assurance – enabling everyone to play their part in building a sustainable future.

We agree with the four main themes that Citizens Advice has identified in its workplan. We welcome the strong focus on the consumer experience in a changing energy market particularly around decarbonising homes, net zero, energy efficiency and affordability. We have provided some more detailed comments below.

Making markets work for consumers

We strongly welcome Citizens Advice safeguarding consumer experience in the evolving energy sector at a time of both historically high wholesale prices and consecutive supplier failures. Consumers will have improved outcomes and see long-term benefits from research-based advocacy for regulatory reforms. This will deliver a more resilient energy market underpinned by better compliance and enforcement at a time consumers need it most. Working alongside Ofgem to track consumer experiences through supplier failure and debt support will be key to informing this advocacy.

We are pleased to see Citizens Advice focus on the myriad benefits of improving the energy efficiency of homes. We strongly agree that consumers currently need better information, protection and support when making their homes more energy efficient or when installing low carbon home technologies. Such support will accelerate the transition to net zero. We support Citizens Advice action to advocate more wide-ranging support for consumers to take action, reflecting the scale of the task. Citizens Advice research to understand the key barriers to retrofit and energy efficiency improvements will be key in overcoming them.

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Better value infrastructure

We support Citizens Advice’s continued efforts to ensure delivering net zero through network investment is good value for consumers. Consumer confidence in this area will be increasingly critical for the energy transition.

We welcome Citizens Advice work to optimise the consumer experience in the smart meter roll-out particularly for harder to engage consumers, the insight collected in this process will provide better outcomes for those using the technology going forward.

Citizens Advice taking on the role of advocate for heat network consumers will drive confidence in the industry which will need to ramp up significantly as part of achieving net zero.

We are particularly pleased to see a focus on improving the experience of public charging as uptake increases and the 2030 phase out nears. We agree that the current system is unreliable and requires improvement. Consumer confidence in this area is key in driving further uptake of electric vehicles. Citizens Advice advocacy for a better complaints and redress process will highlight consumer barriers in public charging which can inform the work undertaken by Citizens Advice and the Electric Vehicle Energy Taskforce.

A fair deal for consumers in vulnerable circumstances

We welcome Citizens Advice’s work on tackling Fuel Poverty in England and Wales which is a key part of a just transition to net zero. We would be keen to work more closely with Citizens Advice around the development of future fuel poverty schemes in GB and England, particularly the plans for Energy Company Obligation post 2022 and the Home Upgrade Grant scheme.

We support the case to improve the affordability of essential services for people on low incomes using measures such as social tariffs. Alongside these measures, insight into how successful suppliers are at supporting people out of debt will inform this position and deliver better outcomes for energy consumers. Fuel poverty is rising and predicted to rise throughout the year and we are pleased Citizens Advice will continue to advocate for targeted support within the energy system to help those at particular risk of fuel poverty. We are likewise pleased Citizens Advice will bolster current Government schemes aimed at fuel poor households such as ECO4. We value the focus given to understanding the lived experiences of fuel poor households and the work to identify gaps in support as we have seen in our work delivering Home Energy Scotland, consumers have better outcomes when advice and support is specific to individual needs. We are pleased that Citizens Advice are expanding the number of referrals to their energy advice services as demand for support rises in light of the price cap increase earlier this month.

Protecting consumers in rapidly evolving markets

We are pleased that Citizens Advice continues to have such a strong focus on putting people at the heart of the transition to net zero. Citizens Advice research and advocacy in this area will be valuable in helping the transition happen at pace and understanding the support that people need when making changes to their homes or heating systems.

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We agree that the way we use energy in our homes and the energy system itself needs a radical shift to meet our climate targets and further agree that this transition must be just and support all of society. We value work which will represent consumer interests in the development of the UK government's regulatory approach to smart energy services, eg data control and privacy using smart energy systems. This will again provide confidence in the market and drive uptake making more efficient use of our energy systems. For smart charging, we agree that innovation is an opportunity to serve as wide a group of consumers as possible and think that Citizens Advice are well placed to lead the debate on providing consumer protection. Understanding barriers to engagement with new energy services will highlight gaps in support and provide a consumer-focused blueprint for future innovation.

We agree that national and local decisions around low-carbon heating must be consumer focused and far-reaching. The deployment of low carbon technologies such as heat pumps, biomass boilers, advanced storage heaters, heat networks and hydrogen boilers are vital in meeting net zero and will require significant behaviour change. It is because of the behaviour change needed that it is so important that decisions around deployment of these technologies is led by consumers. We therefore strongly support Citizens Advice continued advocacy on the need for meaningful consumer public engagement on net zero. Consumer support must be 360 degree and follow people seamlessly through their low carbon journey to maximise engagement.

We are pleased that Citizens Advice will engage with government in ensuring adequate, robust consumer protections are in place around low carbon technologies. The consumer journey in the transition will determine its success which is why we support ongoing analysis of the issues consumers experience with low carbon technology and energy efficiency measures. This analysis feeds back into the supply chain. We value knowledge sharing across stakeholders and believe it will improve service delivery and outcomes for consumers.

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