

Ofgem's call for input on data sharing in a digital future: consumer consent

Citizens Advice Response



**citizens
advice**

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Contents

About Citizens Advice	2
Summary	3
Response	5
1. Do you agree that a consumer consent solution is required as per the taskforce's recommendation?	5
2. Could you please provide any reasons why the current methods for obtaining consent from a consumer might be ineffective or inefficient?	6
3. Do you believe there is a risk of low consumer buy-in to the proposed solutions? If so, why?	8
4. Do you agree that the four use cases referenced are high priority use cases? Can you describe any higher priority use cases?	9
5. Do you believe that a new consumer consent solution would enable the improvements to the energy system described in the four use cases? If not, could you please elaborate?	11
6. Do you agree with our method and scoring of options?	12
7. Which of the options referenced in this chapter do you believe would be the most appropriate consumer consent solution, for the industry, the government, and the consumer?	12
8. Please can you explain why you chose a specific option? Do you have any suggestions on how to improve this option?	15
9. What barriers do you see to the successful implementation of a new consent solution?	16
10. What do you think are the roles of Ofgem, industry and stakeholders in enabling a simple and effective consent solution?	17

About Citizens Advice

We can all face problems that seem complicated or intimidating. At Citizens Advice we believe no one should have to face these problems without good quality, independent advice. We give people the knowledge and the confidence they need to find their way forward - whoever they are, and whatever their problem.

We provide support in approximately 2,500 locations across England and Wales with over 18,000 volunteers and 8,650 staff.

Through our advocacy work we aim to improve the policies and practices that affect people's lives. No one else sees so many people with so many different kinds of problems, and that gives us a unique insight into the challenges people are facing today.

As the statutory consumer watchdog for the energy and post industries we have an important role to play in shining a spotlight on the problems consumers encounter, providing solutions to these problems and ensuring their voices are heard when important decisions are made about the future of these essential markets.

Summary

We welcome Ofgem's call for input having initially recognised the need for a consumer consent solution when we published our paper on the [smart meter data dashboard](#) in 2018. Our research shows that 89% of consumers think that it's important to have control over how their data is used. A consumer data dashboard will help build the trust and confidence that consumers need to engage in the energy market as it transitions to net zero.

The current methods of seeking consent include important checks and balances designed to control data access. While networks and suppliers largely access energy demand data based on their licence conditions, third party intermediaries (TPIs) and other new services are required to seek more explicit consent. These will play a crucial role in facilitating a more complex and flexible energy system, but it is important that they are adequately regulated to provide consumers with the protections they need.

The existing systems for obtaining consent give consumers some transparency and control at the initial point of interacting with a service provider, but fail to give longer term reassurance and ongoing control.

A single technical consent solution - like the consumer facing data dashboard proposed in option one - will make it simpler for consumers to know who is using their data, for what purpose and over what time period. One of the benefits of a single data dashboard is that it would prevent consumers from needing to identify the users of their data themselves and then seek out individual dashboards.

This approach would also reduce the burden on industry by providing a clear path for compliance. It should also make it clear how public bodies can gain consent to access consumer smart meter data, helping to unlock innovative new use cases that meet the needs of consumers.

Any consumer focused solution should work for a range of consumer groups including people who are less digitally confident. It is vital that the consumer dashboard is thoroughly user tested and explains the functions and purpose of the tool in simple language.

Ofgem will play an important role in outlining expectations for a minimum viable product. It should also clarify how a new consumer consent process would interact with data sharing rules under existing licence conditions and as administered by the Smart Energy Code. Ultimately, the industry will be responsible for the success of the dashboard and should embrace this proposal as an opportunity to build consumer confidence.

Response

1. Do you agree that a consumer consent solution is required as per the taskforce's recommendation?

Citizens Advice has been advocating for a consumer consent solution since we published our paper on a smart meter data dashboard in 2018.¹ We believe that a consent solution that provides consumers with transparency and control will play a key role in unlocking the value of smart meter data and facilitating the transition to net zero. We have engaged with stakeholders across the energy market - including through the energy digitalisation taskforce - to emphasise the need for a simple consumer dashboard and are pleased that work on the topic is now progressing.

Smart meter data will help to unlock the benefits of flexibility for the energy industry and consumers. Using data effectively has the potential to reduce the costs of reinforcing the grid and allow consumers to save money by shifting their energy usage. However, these benefits will only be possible if consumers trust the way their data is being used by networks, suppliers and third party intermediaries.

Our research found that consumers are concerned about how their data is being used:

- Nearly a quarter of people (23%) we spoke to said that concerns about companies accessing their data are the biggest barrier to using a smart meter ([Smartening Up](#), 2021)
- 89% of consumers state that it's important that they are given options to opt out of providing access to their data ([Clear and in Control](#), 2019)
- 57% of 25-34 year olds said that it was important to them to be able to opt out of sharing smart meter data vs. 30% of people aged 65+ (Forthcoming, 2024)

A consumer consent solution is needed to build trust with consumers, not just to aid the transition to net-zero but also to rebuild confidence in the industry more broadly. In August 2022 Which? recorded a record low trust rating in the energy industry with nearly half of consumers reporting that they do not trust the

¹ Citizens Advice, [The Smart Meter Data Dashboard](#), 2018

energy sector to act in their best interests.² Figures have improved steadily in the last year, but in May 2023 they remained well below pre-crisis levels.³

Creating a consumer facing product is vital for empowering consumers as energy users. However, transparency over data use must be accompanied by a meaningful ability to exercise control. The data privacy and access framework outlines certain core use cases in which suppliers and networks are required to process consumer data on “legitimate interest” grounds. For most other use cases - and particularly data use by unregulated services - we believe that explicit consent should be the preferred method for accessing data because of the way that it centres consumer control. While we acknowledge that other legal bases for accessing data exist under GDPR, we are concerned that moves away from the consent based principles established in the data access and privacy framework could risk damaging consumer trust.

The emphasis on consent shouldn’t be seen as a barrier for energy industry participants but rather as an opportunity to meet consumers’ needs and build trusted relationships.

2. Could you please provide any reasons why the current methods for obtaining consent from a consumer might be ineffective or inefficient?

At the moment, consumer demand data is accessed by suppliers and networks in order to fulfil the requirements of their licence. For the most part, this access does not require these stakeholders to seek explicit consent (unless network operators wish to access data that has not been anonymised or suppliers want access to more granular data). In contrast, third party intermediaries are required to seek consent whenever they are accessing consumer demand data.

When consumers are required to provide explicit consent they must confirm their address (and that they occupy the property associated with the smart meter data they are sharing). This process is typically carried out by asking consumers to provide their MPXN or by using the consumer's bank details to connect them to their address. This process can present an administrative burden that may dissuade consumers from providing consent. However,

² Which?, [‘Consumer Trust in November 2022’](#), Accessed: 26.01.2024

³ Which?, [‘Consumer Trust and Concern in May 2023’](#), Accessed: 26.01.2024

confirming a consumer's identity is a vital protection against unauthorised access to smart meter data. When meters are not correctly attributed to properties or bill payers we have seen evidence of erroneous switching and inaccurate billing. These mistakes underline the importance of accurately connecting the bill payer and the property.

The existing consent landscape may appear particularly stringent for third party intermediaries. However, we believe it is appropriate given that - at the time of writing - third party intermediaries remain unregulated and their services are discretionary. Third parties have the opportunity to sell optional products and services to consumers in exchange for access to their data. For consumers, offering consent over data use is reasonable if a product adds significant value.

Third party intermediaries (TPIs) are predicted to play an increasingly important role in delivering flexibility services for consumers along with price comparison and automatic switching services, particularly as the energy market transitions to market-wide half-hourly settlement (MHHS). Given their unregulated status, TPIs are not under the same sectoral obligations as suppliers and networks when it comes to providing redress, regularly updating consumers on their current data sharing choices or allowing consumers to opt-in or out - though they will need to comply with general data rules under GDPR.

Although regulation of TPIs offering flexibility services is being introduced, there is a risk that gaps in protection will emerge for customers who continue to use the services of unregulated TPIs. In our 2020 report, [Stuck in the Middle](#), we found that 70% of consumers think that energy price comparison sites and autoswitchers should be regulated. It is important that responsibilities around consumer's data are central to any new regulatory regime in order to prevent a two-track system where data protection standards are lower for TPIs than they are for suppliers or networks.

Existing consent processes provide necessary control for consumers at the initial point of data sharing, however that control is quickly lost. The Data Communications Company (DCC) has - by design - no consumer facing role. This means that consumers are currently unable to establish who is accessing their data, in what detail or for what purposes. If a consumer has concerns about who is accessing their data the only organisation they have a direct relationship with

is their energy supplier. However, an energy supplier has no means of knowing who else might be accessing their customer's data via the DCC.

The DCC also lacks adequate checks and balances when it comes to sharing data with designated other users. If a DCC user requests data from a consumer or business meter then it is passed to them via the DCC, there is no check from the DCC that consent has been gained. Instead, by passing the process of becoming a DCC user they are deemed to be trustworthy. Once a user has accessed consumer data via the DCC a consumer has no way of preventing that access without contacting the user directly.

3. Do you believe there is a risk of low consumer buy-in to the proposed solutions? If so, why?

Our data shows that consumers are concerned about how their smart meter data is being used. However, our research has also revealed that consumers operate within a "privacy paradox". This means that while having the option to opt-out of data sharing is important to consumers very few actually use that option. In its market-wide half-hourly settlement impact assessment Ofgem reported that the rates of consumers opting-out of data sharing were low "with a number of suppliers reporting single-digit percentages".⁴

This suggests that the value consumers gain from the proposed consent solution may not be reflected in the number of consumers who engage with the consent dashboard at its launch. Our research shows that having the option to view and control your data usage is reassuring to consumers even if that option isn't used. The google dashboard is an example of this phenomenon from outside of the energy industry. The dashboard provides a summary of the data associated with a google account and the services used. While the dashboard reports relatively low traffic it is a key way that google provides users with transparency.

For consumers to buy in to a consumer consent dashboard, suppliers, networks and third party intermediaries must be able to clearly explain its value. A consumer dashboard will be particularly valuable following the move to market wide half hourly settlement and the expansion of complex time of use tariffs. Suppliers, networks and third party intermediaries will face the challenge of

⁴ Ofgem, [Market-Wide half-hourly settlement: Final Impact Assessment](#), 2021.

explaining the value of new energy products and services alongside a new data dashboard. A program of consumer awareness and education will play an important role in explaining the use and relevance of a data dashboard.

It is also important to consider specific groups of consumers who may find it more difficult to engage with a data dashboard including those who are digitally excluded. In a recent report, [Access Denied](#), we recommend that all digital services need to be simple and accessible to meet the needs of digitally excluded consumers and those who support them. Even when following best practice it is likely that some consumers will never engage in a consumer data dashboard. Ofgem and the Government must ensure that default data sharing conditions do not penalise disengaged consumers.

Despite significant challenges, there is evidence to suggest that consumer facing tools will play a valuable role in the transition to a net zero energy system. The creation and popularity of the smart meter checker tool (which tells consumers what type of smart meter they have and if it is working in smart mode) serves as a strong proof of concept for creating “windows” into the DCC for consumers to use.

4. Do you agree that the four use cases referenced are high priority use cases? Can you describe any higher priority use cases?

All of the use cases identified demonstrate the potential benefits that improved data use will have for consumers and industry.

Retail specialisation

We have recently published a paper [Ripping Off the Band-Aids](#) that outlines the potential benefits of increasing retail specialisation for consumers. Many specialised services will require access to consumer data. As the energy system becomes more complex, specialisation will mean that some consumers will have their needs better met (for example having access to “energy as a service” models that would require a specialist energy company to provide a heat pump as part of a package of services).

We have also identified the risks that specialisation presents for groups of consumers who may need more support and could be at risk of slipping through the cracks in a more specialised energy market. Specialisation also introduces

the risk of “less desirable” consumers being excluded from accessing certain products and services.

We see data playing an important role in creating a safety net for some of those consumers. Our report [Closing the Gap](#) outlined how better data sharing between companies and simpler, one-time routes to inform and update support needs can support consumers in vulnerable circumstances. In order for consumers to engage with a “universal priority services register” they need to feel confident that the appropriate data protections are in place.

Energy System flexibility

We know that flexibility will play a key role in the transition to net zero and that household demand data is necessary for a range of products and services that are central to the future energy market. These include: time of use tariffs, energy as a service models, bundled products and marketplace models. These innovations have the potential to reduce energy consumption, save consumers money and make homes more comfortable. Detailed usage data will also be needed for comparing prices and switching providers. Many of these uses have the potential to enable load shifting which in turn would reduce the amount of reinforcement work required for the grid.

However, forthcoming Citizens Advice research has indicated that interest in time of use tariffs drops when consumers have negative experiences of existing products and services in the energy market. We found that consumers who are currently using smart enabled products and services are the groups who are most concerned about having the ability to opt out of data sharing. In order for innovative products, like time of use tariffs, to be used widely and effectively consumers must have confidence that they have choice and control over how their data is being used.

Reduced barriers to market entry and increased competition

In order to foster innovation it is important that there is a level playing field when it comes to access to consumer data. However, that shouldn't mean watering down requirements around consent and communication with consumers. Third party intermediaries should be able to access consumer data, but their obligations around data protection should be as stringent as those placed on suppliers. To do otherwise risks opening a loophole that could place

TPIs at a competitive advantage or encourage suppliers to use TPIs to circumvent their licence conditions around data.

It's important that any market entrants who are relying on demand data to deliver their products and services have a clear argument for the consumer need they're meeting. Consumer demand data is a valuable asset and suppliers and third parties should be expected to provide a valuable product or service in exchange for seeking consumer's consent to access that data. This consent based model has worked effectively when used in demand flexibility schemes and provides the framework for a number of existing third party intermediaries providing energy saving advice services. However, we do recognise that TPIs need access to data for product development purposes - particularly given that suppliers are able to carry out research and design on consumer data as part of their licence. In order to ensure fair competition, fully anonymised demand data should be made available. We are aware that work is underway to explore how aggregated demand data held by network operators might be made "open" and available for use.

Consumer empowerment protection and trust

Transparency and control will help to improve consumer confidence. In [Smartening Up](#) we found that 60% of consumers said that control over what data they can share, and clear information about what companies can access would improve their confidence in the market for smart energy services.

We are pleased that the call for input identifies the important role that data can play in improving outcomes for consumers in vulnerable circumstances. We are particularly interested in the suggestion that data could be better utilised to improve the functioning of the priority services register (PSR). In our recent report [Closing the Gap](#) we outline the shortcomings of the existing PSR. Data sharing both within and across essential services should be improved. There is an opportunity to share learning from data sharing infrastructure associated with smart meter data with work looking to improve the PSR.

There are also a number of additional use cases we would like to mention:

- Home efficiency analysis - use your usage data to establish how efficient your home is. Potentially combined with temperature data it can help you work out if (for example) a heat pump is right for you or solar panels etc.

- Connecting to smart home kit - your meter and HAN will have access to tariff rates and DSR alerts, smart home kit that can access these data flows could do things like manage appliances for you
- Joining up with other data sets in the smart data ecosystem for example home security systems, insurance companies who offer better rates when they know more about how you live your life, financial products/loans that use your usage to evaluate profile/credit worthiness

5. Do you believe that a new consumer consent solution would enable the improvements to the energy system described in the four use cases? If not, could you please elaborate?

In order to engage in the products and services that will drive energy system flexibility, consumers need to trust key stakeholders in the energy market and feel confident that their needs are being met. Building trust and confidence in the market presents a significant challenge, but we believe that providing control and transparency over data use - by using a single centrally hosted consent mechanism - is an important piece of the puzzle.

In addition to building confidence and trust, we believe that a uniform consent pathway for accessing consumer usage data will reduce the barriers for entry into the market and facilitate innovation. The dashboard should be agile enough that it can incorporate data uses that will arise in the future energy market. This could include for example showing consumers what devices are connected to their home-area-network or providing an option to opt in to sharing near real time usage data.

6. Do you agree with our method and scoring of options?

We strongly agree with the method Ofgem has used to score the options presented. We're particularly pleased to see that half of the critical success factors are based on the impact that the chosen option will have on consumers. We also think that the sub-categories: consumer empowerment, predicted consumer engagement, consumer protection and trust and accessibility helpfully capture the ways that a consent solution might impact consumers. We're pleased to see that "consistency" is included under the solution development and maintenance section. Having a clear and consistent solution that consumers can rely upon and engage with over time will help to build trust and encourage uptake.

We agree with the way that each of the three options has been scored.

7. Which of the options referenced in this chapter do you believe would be the most appropriate consumer consent solution, for the industry, the government, and the consumer?

- **Option One: A single technical solution to obtain consent, such as a consumer consent dashboard. This proposal builds on the Energy Digitalisation Taskforce's recommendation to deliver a technical consent solution.**
- **Option Two: A set of principles outlining a consistent way for trusted market participants to obtain consent, such as Data Best Practice.**
- **Option Three: An industry developed code of conduct outlining a consistent way for trusted market participants to obtain consent, such as the Confidence Code.**

Option 1

Since 2018, Citizens Advice has been calling for a smart meter data dashboard that gives consumers transparency and control over how their data is being used.⁵ We are therefore pleased to see that many of the core principles of our proposal are included in option one outlined in this call for evidence. We believe that option one is most likely to meet the needs of consumers as well as delivering benefits for industry and the government. It is important however that the quality of the technical solution is high enough to adapt to the needs of the future energy system while delivering a quality user experience.

As we outlined in our original report, for consumers to become empowered data decision makers they need how their data is being used - by whom, over what time period and for what purpose - and they must have the ability to control that data use.

As the call for input suggests, a single dashboard (as opposed to a more piecemeal approach with different dashboards produced by different actors in the energy market) will make the platform more accessible for consumers. One

⁵ Citizens Advice, [The Smart Meter Data Dashboard](#), 2018.

of the benefits of a single data dashboard is that it would prevent consumers from needing to identify the users of their data themselves and then seek out individual dashboards. This would be particularly helpful given that consumers may not have ongoing relationships with all of the companies they may consent to share their data with, for example price comparison websites or switching providers.

A single, centrally hosted solution would also be more accessible for digitally disadvantaged consumers. In our 2022 paper [Access Denied](#) we worked closely with digitally disadvantaged consumers to understand how to improve their engagement with the energy market. Aside from maintaining offline services the key recommendation we made was for digital services to be simplified as far as possible.

A single consent solution will also improve access to data for a range of actors who might be using data for public good purposes. The data dashboard will make it clear the consent standards that these organisations must follow and will allow consumers to more readily consent to sharing their data with local authorities, academic institutions or even advice providers like citizens advice.

We anticipate that providing a single technical solution would reduce the burden on industry by providing a clear path for compliance. By improving consumer trust, a data dashboard is also likely to increase the number of consumers willing to engage in innovative new products.

A consumer facing data dashboard will encourage consumers to engage with flexibility products, in turn helping the government to meet its net-zero goals. Our report, [Zero Sum](#), outlines the conditions that will need to be in place to bring consumers along on the journey to net zero. We argue that companies providing energy products, services or supply must be required to make information about products and services transparent and accessible. This will be crucial in giving consumers the confidence to engage with (and change) the way they use energy.

It is important that the dashboard host is chosen carefully. If the data dashboard were to be delivered by individual suppliers there is a risk of potential abuse. Information on who a consumer is sharing data with is, in itself, potentially sensitive data. Accessing someone's data dashboard would allow you to see which services they make use of and a particular users' apparent propensity to

share data, as well as which services they appear to value most. Specific risks could include:

- an energy supplier noticing that a consumer is using an independent energy efficiency advice service and using that information to tailor marketing materials to the consumer,
- or the energy supplier gaining the knowledge that a consumer has started making use of services that help them switch to a better tariff and then courting them with better rates as a retention strategy.

The company or organisation that hosts the tool will have to be a trusted party.

Options 2 and 3

Neither option 2 nor option 3 guarantee a consumer facing solution. It is vital that consumers are put at the centre of the transition to net zero and providing a mechanism for transparency and control helps to do that.

There is also a risk that these approaches could lead to an overly complex mechanism that requires every actor in the energy market to develop their own data dashboard. We can take learnings here from the shortcomings of the Priority Services Register as we discuss in our paper [Closing the Gap](#). Depending on the geographical area, between 30% and 70% of people who are eligible are registered on their energy network's PSR. This low engagement is partly due to the piecemeal nature of the register, with each supplier and network using different definitions of vulnerability, requiring different forms of data and using different portals. This is replicated further across multiple PSRs in different sectors. The Government has recognised these shortcomings and is now beginning work to develop a single, cross-sector PSR.

The call for input suggests that option 3 has the potential to graduate on to be a consumer dashboard, a framework of principles, or something else entirely. If that is the case it feels most effective to simply make a commitment to one of the other two mechanisms rather than spending time on an additional layer of decision making from industry. We would also like to point out the limitations of an approach similar to the Confidence Code, which offered limited consumer benefit, suffered from low consumer awareness and ultimately did not keep pace with changes in the sector.

8. Please can you explain why you chose a specific option? Do you have any suggestions on how to improve this option?

As outlined in our response to the previous question, we believe that a single technical solution like a consumer dashboard will most effectively empower consumers as data users.

One challenge, which has been explored by the Retail Energy Code Company is how the dashboard might be practically implemented.⁶ In particular, how a consumer data dashboard would work for consumers living in the private rented sector. In our [Room for Reform](#) report we found that over 1 in 8 renters (13%) have their landlord manage their gas and electricity. This means they are barred from engaging in the energy market and risk missing out on key protections. Given the greater use of data and specialised energy products and services we've previously called for tenants to be able to request to take control of their energy supply, where this is feasible, and for the scope for re-billing to be limited.

One approach to managing access to the data dashboard in households with multiple occupants is to provide access to the bill payer, perhaps with the option to provide "read" access to non-bill paying households members. However, this becomes more challenging in situations where bills are paid directly by non-resident landlords rather than tenants. In that instance it wouldn't be appropriate for landlords to be able to view or edit the households data sharing preferences.

Changes in tenancy also represent a data access challenge. It is important that tenants on deemed contracts are not able to access previous tenants' energy demand data. However, there is an opportunity for the dashboard to provide new occupants with an indication of their current supplier - replacing existing tools that provide a similar function. The dashboard would also allow new occupants to check that their meter has been adequately wiped and any ongoing data access agreements ended.

While a consumer consent dashboard will play a significant role in empowering consumers, it is also only one part of a wider consumer protection picture. It is vital that consumers have access to redress if their data has been misused. By identifying which organisations are accessing consumer's data and for what

⁶ Retail Energy Code Company, ['Consumer Consent: consumer focused findings'](#), 2023.

purpose the dashboard will help to build accountability. If consumers then decide to raise a complaint or seek redress companies must be clear on their responsibilities. In order to provide meaningful consumer protection it is important that all TPIs are regulated thoroughly. We look forward to Ofgem sharing further detail on the enforcement arrangements associated with a new consumer data dashboard. We recognise the significant role that the ICO will play in determining failures to comply with data rules, but would also welcome some responsibility being held by the dashboard owner.

9. What barriers do you see to the successful implementation of a new consent solution?

Consumers must be at the centre of all design decisions made about the dashboard. User testing with consumers, including those in vulnerable circumstances and consumers experiencing digital disadvantage, will be incredibly important if the dashboard is to work in practice.

As suggested in the call for input, it will be vital that consumers are informed about the function and purpose of a new data dashboard. Suppliers and trusted third parties will have a key role to play in informing consumers about their data rights and how they can use the data dashboard.

There's a risk that if the dashboard isn't implemented successfully from the beginning it will knock consumer confidence and engagement. The need to get it right must be balanced with the urgency of the task at hand. When market wide half hourly settlement is introduced in 2026 we can expect demand for access to smart meter data from third party intermediaries to grow significantly. At the same time, suppliers and networks are expected to be making more use of smart meter data. This consent solution should be up and running to support consumers in the transition to MHHS.

10. What do you think are the roles of Ofgem, industry and stakeholders in enabling a simple and effective consent solution?

We are pleased that Ofgem is taking an active role in progressing work on a consumer consent solution. We think it is right that Ofgem set the framework for

the aims of the consumer dashboard as well as outlining their expectations around a minimum viable product. Ofgem should also be clear about the ways that a new consumer consent process would interact with data sharing rules under existing licence agreements and as administered by the smart energy code.

Ofgem should also coordinate with the relevant departments in government to ensure that any developments in consumer data use are in step with the creation of a universal priority services register.

While Ofgem are responsible for providing guidance on the consumer consent dashboard it is up to industry to make the dashboard a success. As we outlined recently, the industry should not see consent as a barrier to innovation but rather as an opportunity to build consumer trust and confidence.⁷ A single consent mechanism will make it easier for the industry to access consumer data. It should use that access to find innovative ways of using data to meet consumer's needs. Various third party intermediaries have demonstrated the feasibility of using consumer data to better identify households in fuel poverty. Suppliers and network operators should use new data tools like these to better meet consumer needs.

Consumer advocates like Citizens Advice have an important role to play in providing the consumer perspective on issues related to data and digitalisation. We will continue to engage closely in Ofgem's process and with wider stakeholders.

⁷ Citizens Advice, [Can big data solve big challenges in the energy system?](#), 2023

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