

Ofgem's Call for Input Consumer Outcomes

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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.

Executive Summary

Citizens Advice welcomes Ofgem's call for input on Consumer Outcomes. For several years we have advocated for a more outcomes-based approach to regulation, including in our report [Raising the Bar](#)¹. In it we called for a model similar to the Financial Conduct Authority's (FCA) Consumer Duty. We think this approach can create a regulatory environment which protects consumers, promotes innovation and competition, and helps to bring down the cost of the transition to net zero.

As products and services become more complex, asymmetries in information are likely to grow. To tackle this and ensure consumers are confident to engage in the market, we think it is particularly important that there are clear outcomes on:

- **fair price** - to ensure that consumers can be confident that the services they sign up for provide fair value, and
- **products meeting consumer needs** - so firms can monitor and respond to consumer experience on an ongoing basis

To ensure any outcomes-based framework remains coherent, drives high standards and embeds strong protections, we think it will also be necessary to update Ofgem's requirement to treat customers fairly (SLC 0/0A), which in its current form expressly excludes the prices firms can charge. Changes must be in line with the FCA's new consumer principle, which requires firms to 'act to deliver good outcomes for retail customers', and covers the price and value of products.² This approach would also ensure alignment where products or services are across regulatory boundaries, for example, where low carbon technologies are leased under a financial agreement.

We often hear from firms that the current framework fosters uncertainty and does not enable risk-taking in areas where there are no prescriptive rules. An outcomes-based approach should aim to create clear guardrails for suppliers

¹ "Raising the Bar", Citizens Advice. April 2022.

<https://www.citizensadvice.org.uk/policy/publications/raising-the-bar/>

² "FG22/5 Final non-Handbook Guidance for firms on the Consumer Duty", FCA, July 2022.

<https://www.fca.org.uk/firms/consumer-duty/resources>

while enabling more space for them to take different approaches that best meet the needs of their customers.

The use of Ofgem's existing Consumer Interest Framework, as the starting point for an outcomes-based approach, is sensible, and means key areas would be covered. The categories listed in the call for input are also helpful in identifying those areas. However, we are concerned that the 24 outcomes proposed runs counter to Ofgem's aim to create a simplified framework. We believe this list should be consolidated.

We also think there are some key gaps in the proposed outcomes. For example, given the additional risks faced by people who use prepayment, we believe that setting a specific outcome would offer greater clarity and coherence with the range of prescriptive rules that exist in this area. Any future expansion of the framework to other services, like heat networks, may also need additional standalone outcomes that are tailored to their specific needs.

We support a hybrid framework which strikes the right balance between advancing an outcomes-based approach, and ensuring that consumer protections in key areas are not compromised. In some areas, prescriptive rules could be removed immediately, or fall away over time as the market develops,³ with particular focus on pricing and product rules that limit innovation.

Where there is more risk and/or more significant harm, it would be appropriate to retain or strengthen some prescriptive rules or backstop protections, including protections around prepayment meters, debt, and billing. We also think Ofgem should particularly consider strengthening some key non-domestic protections, since many of these are already weaker than those in the domestic market.

We have separately responded to Ofgem's call for input on Guaranteed Standards of Performance (GSOPs), which may create some opportunities in these key areas to improve supplier incentives, alongside a wider move to outcomes-based approach.

³ "Citizens Advice response to Ofgem's call for input on the future of domestic price protection", Citizens Advice, May 2024.

<https://www.citizensadvice.org.uk/policy/publications/citizens-advice-response-to-ofgems-call-for-input-on-the-future-of-domestic/>

To achieve the cultural and behavioural change intended by a shift to an outcomes-based framework, and to ensure continuous improvement, there needs to be a clear mandate on suppliers to develop their own monitoring of outcomes. They should also be able to demonstrate to Ofgem how they are using these to inform decisions about product design and services. An annual output like the one firms are required to produce in FCA's framework, could play a useful role in demonstrating this to customers.

Supplier led monitoring should be done in tandem with effective monitoring, and enforcement by Ofgem to ensure compliance and to protect consumers from harm and poor practice. It should include the collection of data and publication of standardised reporting on key outcomes, and where possible, clear thresholds for intervention. Advice and advocacy bodies should also continue their role in this space to ensure a holistic approach.

Ofgem's recent Compliance Operating Principles are a good step in this direction, but Ofgem should also learn lessons from previous principles-based regulations to ensure that new outcomes-based rules are enforceable. We also remain concerned by the slow pace of some enforcement activity, with investigation of failings related to prepayment meters still ongoing after 3 years. Slow investigations can reduce the deterrent effect, delay compensation and leave consumers open to risk.

We would also caution that, while helpful, a move to a more outcomes-based regulation system may not be sufficient to significantly drive innovation in the market. Further action may be needed, including changes to the Universal Service Obligation (USO), in order to enable more specialisation by firms.

Response

Q1. In your view, what are the key factors we should consider if we are updating our regulatory framework for retail energy suppliers, keeping in mind the balance between our growth and net zero goals, and consumer interest duties?

The primary focus of updating Ofgem's regulatory framework should be on consumer protections and the consumer benefits of a more innovative and competitive market. This should aim to support growth and net zero by increasing the options for engagement and enabling new clean energy services. Shifting to a more outcomes-based approach, should include clear parameters in order to measure effectiveness and success. Alongside greater reliance on outcomes in some areas, this could also include stronger backstop protections in key areas like billing, use of GSOPs to drive compliance with key minimum standards, and responsive monitoring, compliance and enforcement activity.

Q2. Why do you think there is such a divergence of satisfaction rates across different consumer cohorts?

Recent gains in energy market satisfaction are positive. However, we support Ofgem's ambition to drive further improvements so that the sector matches the performance of the highest scoring essential services such as banking and broadband. We also recognise that service improvements are not being experienced equally by all consumers.

Consumers have different needs and experiences which cause some divergence in satisfaction when comparing specific consumer cohorts. Additionally, some groups who find it harder to engage are among those with lower satisfaction. Steps to strengthen competition and diversify offerings should improve the experience of those who are already engaged and enhance greater engagement. However, this is likely to take time to change, and some consumers will remain disengaged. To prevent some consumers falling further behind, there remains a need for clear parameters and consumer protections as Ofgem shifts to an outcomes-based approach.

From our recent Energy Consumer Satisfaction Survey and key driver analysis research (delivered in partnership with Ofgem), it is clear that improved supplier services can improve overall satisfaction in a meaningful way. This indicates that areas such as billing, smart metering and ease of contact are key to overall satisfaction. These are areas where Ofgem should carefully consider the right blend of consumer outcomes and protections to support different consumer groups, including those who are currently disengaged. We think this should include stronger backstop protections around smart metering and billing, given the significant impact these can have on overall satisfaction.

Q3. The Consumer Outcomes have been developed based on what industry, charities, consumer groups and consumers have told us they need to cover. Do you agree that these outcomes cover the most important expectations consumers have of energy suppliers?

We understand many stakeholders would like to see a more simplified regulatory framework which further promotes consumer protections and helps suppliers to compete, innovate and meet net zero goals.

We support the use of the Consumer Interest Framework as a starting point for the consumer outcomes, and the larger umbrella categories in the call for input which cover most areas that are important to customers. However, to make the new framework coherent and send a clear signal to consumers that this approach should deliver for them, we think Ofgem should also introduce an overall Consumer Duty as a vehicle to deliver good outcomes. To be effective, it's also vital for Ofgem's overall expectations of suppliers to include price, unlike the current SLC0/0A.

In relation to prepayment, suppliers will need to refer to a number of other outcomes on debt, vulnerability, and accessibility and responsiveness to understand what a good consumer outcome looks like. This increases the opportunities of misunderstanding and misinterpretation, and ultimately consumer harm. Given the particular additional risks for this group, we think a standalone prepay outcome would be clearer and provide coherence with the various prescriptive rules related to prepayment.

We're also aware that if the framework is applied to cover a wider range of services, such as heat networks, further specific outcomes may be needed.

Q4. Do you think we should streamline or consolidate the Consumer Outcomes further and, if so, which should we prioritise?

Alongside the additional outcomes proposed above, we think the initial list of 24 outcomes in this call for input should be consolidated in certain areas, particularly where outcomes are similar, such as consumers' awareness of energy options and enabling choices, and simplified where outcome descriptions are particularly long. This should help avoid confusion and minimise risks that outcomes do not align or are misinterpreted, while also helping firms to prioritise.

Q5. Do you agree with the explanations provided of the Consumer Outcomes in the appendices of this call for input? Do they help you understand the intent of the outcomes?

The explanations of each consumer outcome in the appendices are helpful to understand the potential direction Ofgem is proposing, but also to close any gaps and minimise negative outcomes born of supplier discretion and inconsistent interpretation. As the outcomes develop, future consultations should include similar explanations and can help ensure suppliers act to deliver equitable outcomes for consumers. These would also be helpful to better inform consumers of their rights in areas where there is more reliance on outcomes in future.

Q6. Why do you think these outcomes are not materialising consistently for all consumer groups given that they are in line with our existing rules?

See response to question #2.

Q7. Do you think some outcomes are more important for consumers than others?

Some outcomes are fairly universal to all consumers, like consumer information and awareness of energy options that are suitable for their needs. In practice, outcomes may be more impactful for consumers in areas where there is less

prescription or fewer backstop protections that exist or are retained. This is why we think outcomes are initially more likely to shape the experiences of consumers using innovative energy services, where fewer existing rules apply.

We also think there is a need to tailor some outcomes for groups of consumers that have unique challenges and barriers compared to others. For example, we think an overall prepay outcome could more clearly guide actions around self-disconnection and suitability assessments. These would be measured through more specific monitoring of outcomes for these consumers.

Q8. Do you see an opportunity for outcomes, though not necessarily the Consumer Outcomes set out in this call for input, to be applied to wider market participants? Who should they apply to and why?

Yes, we do believe there is an opportunity for an outcome- based approach to be applied to wider market participants, particularly for more innovative products. This can potentially include Third Party Intermediaries and other varied services.

For example, once the load control licence comes into force in 2027, there could be specialised outcomes which relate to the activities of flexibility service providers. A relevant consumer outcome could be that consumers understand what load control means in practice, including when and how their appliances may be controlled, or that flexibility services do not result in adverse impacts, such as under-heating or reduced ability to meet basic comfort and health needs.

Also, some of the Consumer Outcomes in this call for input could also potentially be applied to the wider market as they are broad enough to achieve better outcomes for different consumer bases. For example, the Consumer Outcomes grouped under the Low-cost Transition and the Enhanced Protections for vulnerable consumers headings could make up part of a framework that relates to consumer interactions with a wider range of market actors - such as flexibility service providers or third-party ownership or service models.

We understand that the consumer outcomes call for input is seeking evidence primarily on the energy retail market. New authorisation conditions for heat

networks are currently being phased in, and it will take time for Ofgem to understand their impact. There are thousands of heat networks across the country which vary in age, size and efficiency, while heat network suppliers essentially operate as monopoly providers. Domestic heat network consumers should expect the same outcomes as domestic retail consumers, however the mechanisms to achieve this will likely be different. We expect that more prescriptive and stricter rules will be required in some areas to achieve the same outcomes.

We expect Ofgem in the coming years to be continually learning and iterating based on how the new rules are being applied in practice. Any decisions on outcomes-based measures for heat network consumers should come after comprehensive information gathering, and should not be rushed to align with the energy retail market.

Q9. Do you have a preferred approach among those outlined below or should we retain the current framework? Do you have an alternative suggestion? Please explain your reasoning.

The current framework needs reform in order for outcomes to deliver improved consumer experiences in a more complex market. As set out above, this should include upgrading the Standards of Conduct to include a Consumer Duty, similar to that of the FCA, and changes to ensure that this incorporates price, as well as service.

Overall, we support a hybrid model of outcomes-based principles and prescriptive regulation as it shapes behaviours with better parameters. This would allow for consistency and give the industry some standards of measure where there are risks to consumers, while also providing a way to measure suppliers performance and allowing for comparative analysis. The case study of the UK's Solicitors Regulation Authority used in the call for input is a model worth considering and potentially adopting for the energy sector to deliver a cultural shift.

This framework should enable prescriptive protections to be retained or strengthened where necessary, while enabling the removal of SLCs where these are complex and restrictive, or no longer relevant. Please see response to question #12 for more detail.

We don't support adoption of an outcomes-based model in full, with removal of all prescriptions. This would be disruptive and create key risks in the consumer journey, and place too much pressure on a new outcomes framework. This could lead consumers to experience more issues and harm, and reduce consumer confidence and engagement. If this led to a subsequent reversion to a more heavily regulated sector it could also undermine industry confidence and willingness to invest.

a) What level of action/intervention do you feel would be proportionate to drive up customer service in the non-domestic sector? Does it differ from domestic?

We understand this call for input is not looking for opinions on further regulations through SLCs as such, however, it does seek to understand stakeholders' preference on approach and the balance between prescription and an outcomes approach.

Citizens Advice recommends separate outcomes and potentially additional SLCs to specifically help improve experiences and protections for the non domestic consumer base.

Many of the outcomes capture basic universal protections that all consumers should expect when engaging with their suppliers and the energy market. While non-domestic consumers, particularly small and micro-businesses, tend to navigate and experience the market similarly to domestic consumers, they also have unique challenges and barriers that other consumers do not. Ofgem should take these into account as it moves to an outcomes-based framework, including the more limited prescriptive and backstop regulatory protections that apply in some areas.

For example, billing is currently a very challenging issue for non-domestic consumers. Under the current rules, suppliers are only obligated to contact businesses with a statement of account once a year. While most suppliers provide this more regularly than this, it leaves some consumers at risk of harm. A billing outcome could encourage better practice and improvements for all

consumers if a minimum quarterly billing standard is also introduced for non-domestic consumers, as we called for in our Risky Business report.⁴

A second example is concern around debt for small and microbusinesses. The current proposed outcome on debt would not apply to this consumer cohort. Currently SLC 0A, treating consumers fairly, does not extend to debt collection activities for non-domestic consumers, and debt pathways are very inconsistent between suppliers. Suppliers can disconnect businesses at short notice for failure to pay or accrued debt, unlike consumers in the domestic market. Ofgem should use this opportunity to remove exclusions from SLC 0 to ensure it can set outcomes that pertain to options for repayment, debt collection and disconnection measures.

Q10. Do you think a voluntary approach – where suppliers make a public commitment to deliver the Consumer Outcomes without formal regulatory change could be effective? What conditions would need to be in place for this to work?

Citizens Advice is opposed to a voluntary approach without formal change. If an outcome based approach is to be adopted, this must be done through regulatory change to ensure consumers are experiencing fair outcomes, backed by Ofgem intervention where needed.

To ensure this, effective monitoring and clear performance measures will be necessary to evaluate success; without them, accountability and consumer trust and confidence will be further diminished. This will particularly be the case if suppliers do not deliver what they have committed to.

It would also be too risky for consumers if prescriptive protections were removed or amended on the basis of a voluntary commitment which could be changed at any time, which will undermine the aims of this work.

Q11. Could a more outcomes-based regulatory framework benefit the supply market? Do you think this kind of approach could unlock innovation and growth? Please provide examples.

⁴ "Risky Business? How the energy debt protection gap is putting the pressure on small businesses". Citizens Advice. October 2024.
<https://www.citizensadvice.org.uk/policy/publications/risky-business-how-the-energy-debt-protection-gap-is-putting-the-pressure-on/>

We think there are likely areas of the rulebook where a more outcomes-based framework can remove some current rules that block innovation, building on earlier changes to introduce Standards of Conduct and other principles-based rules.

More importantly given the pace of change in the energy sector, outcomes-based rules can give companies a clear understanding of the outcomes they should consider when designing innovative or emerging energy products and services that current rules do not capture. The alternative approach of attempting to regulate these in a prescriptive way is likely to be more reactive, which can lead to worse consumer outcomes if protection is delayed, and create regulatory risk for firms which could stifle investment and innovation.

The extent to which an outcomes-based approach can be adopted, and the benefits maximised, is likely to depend on other areas of the rules. For example, the current Universal Service Obligation significantly limits the ability of firms to specialise and focus on specific services, which may be a more significant barrier to a more innovative market. We note that essential service markets, like broadband and banking, which have different USO models have higher overall satisfaction and are assessed by some as more innovative.

Q12. Are there specific licence conditions where less prescription could benefit the retail market without compromising consumer protection? a) For suppliers: are there any areas where you find guidance helpful or unhelpful?

As set out in question #11, we think a key benefit of outcomes will be to avoid the need for new prescriptive rules in relation to innovative energy services. Thus, over time this would see prescriptive rules applying to a smaller share of the market.

However, there are 3 types of rules where we think Ofgem should consider making changes alongside a move to more outcomes-based regulation:

- Rules which could be removed for all suppliers to potentially enable more product and service innovation. This includes rules on tariff design (SLC 22A) which could enable more innovative service offers. Similarly, we think Ofgem should not take forward proposed rules requiring suppliers to

offer low standing charge tariffs. We've also argued consumers using more complex default products may be better protected by fair pricing outcomes rather than a prescriptive price cap, with backstop protection from the ban on acquisition-only tariffs.

- Rules which could apply to a smaller number of firms than they currently do, where doing so does not distort competition. This is more likely to be suitable in relation to 'legacy' services which it may be disproportionate for new and smaller suppliers to provide. This could include rules to be a mandatory FIT licensee (SLC 33), SEG licensee (SLC 57) and Green Deal licensee. Ofgem should also explore changes to which suppliers are required to offer a range of payment methods, particularly which suppliers should be required to offer cash payments and serve traditional prepay customers, given these will decline in the coming years, though this should be subject to retention of the prepay levelisation to ensure costs are shared fairly, and ensuring that consumers using these services are protected from unfair prices.
- Rules which are no longer in use, or are less relevant given changes in the market. There are some rules which are no longer in use, including rules on token meters (SLC 12), restricted meters (SLC 22G) the closed CRC Scheme (SLC 21A), the Market Stabilisation Charge (SLC 24A) and the prepay charge restriction (SLC 28A). Others are outdated given system changes and the government's approach to delivering clean power, including rules on fuel mix disclosure (SLC 22G) and environmental claims (SLC 21D).

If the new outcomes are embedded and assessed to be effective, it may be possible to remove further prescriptive rules over time.

We note there are also consumer-facing prescriptive rules outside of the licence which Ofgem should explore as part of its review, to understand how they can/should align with a more outcomes-based approach. These include the Complaint Handling Standards, and retail rules and processes set out in Codes, including the Debt Assignment Protocol.

More radical changes to prescriptive requirements, including on which rules apply to smaller and new entrant firms, would be possible if the Universal

Service Obligation is reformed and additional mechanisms to ensure costs are fairly shared between firms are introduced.

Q13. Are there areas where prescriptive rules should remain in place? If so, why?

As set out above, prescriptive rules and backstop protections should be retained, or strengthened, in areas of key consumer risk. This will drive improvements for consumers who are less engaged or face specific challenges. We think this should include enhancing backbilling protections for people with smart meters. There is also scope for improvements to be delivered via new Guaranteed Standards, including those proposed in relation to smart metering, which should be taken forward.

Significant additional prescription and guidance has been added in relation to prepayment, following the failure of some suppliers to use this appropriately during the energy crisis. We think Ofgem should add a clear overall prepay outcome to drive supplier behaviour, assessing opportunities for simplification of prescriptive rules, and keep them under review based on their effectiveness. There should be a high bar before removing or amending protections given the potential consumer risks.

We also note that a significant number of prescriptive rules introduced in recent years are designed to improve supplier resilience, and are important in limiting the cost and harm to consumers of supplier failures. These rules are likely to remain necessary in the absence of legislative changes to achieve similar outcomes (eg such as introducing more frequent Renewables Obligation payments).

Q14. What factors should we consider to determine whether specific rules are best delivered through prescription, principles or outcomes?

It is important that any framework is centred on the needs and protections of consumers, especially vulnerable consumers. For traditionally vulnerable consumers identified through the PSR or otherwise, prescriptions should remain in place to ensure this. It would also ensure a level of consistency across the market, while providing a clear expectation and requirement for suppliers to follow.

Principles and/or outcomes-based rules would be best delivered through a universal set of outcomes or expectations that all consumers should be able to rely upon when engaging with suppliers and the energy market via a Consumer Duty or similar. This would also mean ensuring distinct outcomes are created for specific consumer bases, like those in heat networks or who have prepayment meters.

Q15. Which of the monitoring approaches we outline below would be the most effective for monitoring supplier performance against the Consumer Outcomes? Are there alternative approaches? Please provide evidence.

There should be a clear onus on suppliers to develop their own monitoring of consumer outcomes, and demonstrate how this informs decisions about product and service design and delivery. An output similar to the Consumer Duty reporting required by the FCA could support transparency and enable consumers to be well informed and empowered.

Consideration will need to be given around the level of discretion that will be left to suppliers in responding to requests for information (RFIs) by Ofgem and other parties. While discretion around what data is provided can establish agency for suppliers to demonstrate that they have met an outcome, it can also create inconsistencies and results that are not comparable.

Ofgem will therefore also need to adapt, and take a more robust approach which looks to assess consumer outcomes in a holistic way. Market level data, like complaint volumes and billing errors, should still have a significant role in assessing if suppliers are performing as expected. Clear parameters can provide comparable data, ensure that monitoring is done efficiently and effectively, and be used to better inform consumers about supplier performance. We think a combination of supplier and Ofgem reporting would be appropriate, along with data collection and analysis from the statutory consumer advice bodies, which will also be impacted by these changes.

Citizens Advice's Star Rating is already an effective tool for comparing supplier performance on a quarterly basis, providing more timely and accessible insight than more detailed annual reporting. As an outcomes-based framework is

developed we will consider what changes may be needed in future, and what data could be incorporated.

We understand Ofgem's concerns that over-monitoring can lead to a pseudo-prescription based system, but this must be balanced against the risk for some groups of consumers that could emerge if there is too much room for interpretation and a lack of accountability. We also recognise that these changes could change the way that its compliance and enforcement functions operate.

Ofgem should seek to learn from other regulators which make greater use of outcomes-based rules to understand how they manage this balance, including how they apportion resource between policymaking, monitoring, compliance and enforcement functions. It should also seek to improve its digital and data capabilities to ensure that monitoring draws on a wide range of data sources in a way that eases burdens and can provide a coherent overview of performance. We're keen to work with Ofgem to consider how data provision from bodies through the Tripartite process can change to support this.

It is crucial that suppliers can continue to be held accountable during and after implementation of any changes. This means that clear thresholds and metrics in the monitoring must be developed by Ofgem alongside new outcomes, prioritising minimum thresholds for each consumer outcome category listed in the call for input (i.e. Debt, Transparency, Resilience etc).

We are concerned by Ofgem's reference to more time being needed for enforcement activity under an outcomes-based approach. Investigations into rules relating to prepayment have been ongoing for over 3 years, and we remain concerned that these delays can prevent clear expectations of supplier behaviour, weaken deterrence and redress, and leave rules open to interpretation for long periods. It's vital that Ofgem considers the bottlenecks in its enforcement work and how it is able to progress these cases more quickly, whether they relate to prescriptive or outcomes-based rules.

Q16. How do we best measure our success as to whether we have: a) Improved consumer outcomes and achieved our ambitions for customer service and b) Reduced regulatory burden and encouraged growth and innovation

As set out in question #15, robust supplier monitoring must be part of the strategy to measure and achieve success. This must be done by having some standards to assess suppliers' performance in a consistent way. Other tools available to Ofgem must also be part of this effort, including consumer survey data and other insights and data from a range of stakeholders, including Citizens Advice.

We expect key success measures for the effectiveness of an outcomes-based approach could include overall consumer satisfaction, complaint levels and resolutions, the range of choice in the market and innovative services, levels of new entry etc. It's important that these measures also assess the distributional impacts to understand if any groups of consumers are benefiting less than others.

Q17. Is there anything Ofgem can do to improve how we work and engage with you as a stakeholder on retail energy supply policy and regulation?

Citizens Advice appreciates ongoing discussions with Ofgem and other stakeholders on how to ensure any regulatory changes are best for the consumer. We would appreciate continuing that effort and better understanding how it sees the various assessments, frameworks and policy proposals, like the Ofgem review and Growth Duty, coexisting and forming a more cohesive system for consumers.

Given the complexity of the changes and the trade offs required we think it could be beneficial to establish working groups of key industry and consumer stakeholders to work through specific issues and challenges, to support and complement formal consultation processes. In addition to incumbent suppliers, this should aim to engage with innovative and new entrant energy service providers, since they may be most affected by the adoption of a

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