

Consultation on scope and delivery approach for making tariff data accessible

Citizens Advice response



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advice**

Citizens Advice
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Introduction

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.

If you would like to discuss any part of our response further, please contact Rachel Mills at rachel.mills@citizensadvice.org.uk

Our response

1.

Not answered

2. Do you agree with the government’s proposal to extend the scope of public tariff data to all tariffs that are applicable to domestic and small non-domestic (microbusiness) consumers? If you do not agree, please explain why.

We agree that the government should introduce a requirement for organisations providing load control to make the information about the tariffs they offer available in a consistent format, in addition to a new complementary licence condition on energy suppliers.¹

It’s important that this benefits consumers as well as the market. We know that one of people’s main barriers to participating in smart energy services is not understanding and being able to compare offers. When we asked consumers to read information about smart energy services and then complete comprehension tests to check their understanding, 40% got something wrong in the tests.²

For more complex time of use tariffs consumers will also need to access their historic, granular consumption data to model their likely costs. Some work in this regard has been conducted through the ‘energy midata’ programme (currently paused), and through the ‘smarter tariffs - smarter comparisons’ project, which built a useful prototype tool based on accessing data from the DCC, but which also identified significant barriers to uptake. It is likely that improved access to consumption and tariff data will remain important for consumers in order to confidently engage with smarter energy tariffs, as well as smarter tools to identify the impacts of adoption of different technologies and behaviour change on costs.

¹ Citizens Advice (2023) [Towards a more innovative energy retail market: call for evidence](#)

² Citizens Advice (2021) [Powering up or facing resistance? How people understand the benefits of smart appliances](#)

3. Do you agree that the data standard should be extended to include gas tariffs? If you do not agree, please explain why.

We agree. Extending the data standard to gas tariffs will enable optimisation opportunities for dual fuel customers.

4. Do you agree that a Supplier Standard API is the most suitable technical approach to enable interoperability of tariff data, based on the analysis set out in the consultation document and analytical annex? Please explain your answer.

In principle we support the approach of using a Supplier Standard API.

A crucial end use case here is tariff comparison tools and advice services drawing on tariff data to support consumers to choose the best tariff for their circumstances. Those providing tariffs are likely to be in the best position to interpret and share their own tariff data in a standardised format for other organisations to use with confidence.

On the other hand, putting the onus on other organisations to interpret non-standardised tariff data would carry risks. Tariff data could be misinterpreted leading to substandard advice and tariff recommendations based on unreliable data.

A standardised API is likely to make the use case for tariff comparison smoother and this is in the best interests of both industry and consumers.

5 - 11.

Not answered

Citizens Advice helps people find a way forward.

We provide free, confidential and independent advice to help people overcome their problems. We are a voice for our clients and consumers on the issues that matter to them.

We value diversity, champion equality, and challenge discrimination and harassment.

We're here for everyone.

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