

Citizens Advice Consumer Work Plan 2024/25: Summary of responses



Contents

Introduction

- 1. Future-proofing markets to meet evolving challenges**
- 2. Addressing affordability issues in essential markets**
- 3. Infrastructure that delivers value for consumers**
- 4. Harnessing innovation to build fairness into services**
- 5. Index of responses**

Introduction

This year we received **30** responses to our draft work plan. They were submitted by a range of stakeholders including key regulators, industry bodies, charities, interest groups and unions.

We welcome all the feedback we have received as an important way of developing our work. We have carefully assessed the feedback and made changes to our final work plan accordingly. This document summarises the feedback we received for each project and any changes made to the work plan.

EDI

CCW

CCW fully supported Citizens Advice's work on EDI and the six core outcomes to characterise a successful consumer market.

National Energy Action (NEA)

NEA called for Citizens Advice to play a key role in shaping Ofgem's updated Consumer Vulnerability strategy.

Utilita

Utilita applauded Citizens Advice's integration of EDI into our advocacy projects and expressed its commitment to working with us to champion the needs of marginalised groups.

Preparing for our new role as the heat network advocate and advice provider (energy)

7 respondents commented on this project. 6 responses were positive and 1 was neutral.

Committee on Fuel Poverty

The Committee welcomed the extension of Citizens Advice's role to act as statutory consumer advocate for heat networks, and looks forward to our evidence. The

Committee believes a better understanding of energy pricing in district heating is needed to inform future safeguards for low-income consumers.

CCW

CCW supported Citizens Advice's plan to prepare for our new role as statutory consumer advocate for heat networks as sensible and logical.

Elexon

Elexon welcomed Citizens Advice's new role as statutory consumer advocate for heat networks.

National Gas Transmission

National Gas Transmission noted Citizens Advice's plans around our new role as statutory consumer advocate for heat networks, and expressed interest in understanding how our activities can help ensure that National Gas Transmission's investments benefit the consumer. National Gas Transmission expressed willingness to work with Citizens Advice on establishing a monitoring function around heat networks, including discussing any data sets and insights it could provide.

NEA

NEA agreed with the importance of Citizens Advice's work in preparing to take on the role of statutory consumer advocate for heat networks, highlighting the need to work collaboratively to ensure the consumer voice is heard in debates around regulation for the sector.

Ofgem

Ofgem welcomed Citizens Advice's proposed approach in preparing for our role as statutory consumer advocate for heat networks. Ofgem said it valued Citizens Advice's expertise in developing regulatory frameworks, our contributions to the External Heat Networks Stakeholder Group and Quadripartite group, and our important role in helping Ofgem monitor the market and represent the consumer voice.

Trust Alliance Group

Trust Alliance Group supported Citizens Advice's work to prepare to take on the role of statutory advocate for heat networks. Trust Alliance Group expressed willingness to share its own insights on consumer experience and detriment, and to work with us on a joined-up approach to regulation, advocacy and redress.

1. Future-proofing markets to meet evolving challenges

General responses to this section

ACRE (Action with Communities in Rural England)

ACRE warned against Citizens Advice accepting an assumption that markets will always supply the best solutions to service issues, and suggested that Citizens Advice should play a role in actively championing parts of the population that may be less attractive from a profit making perspective, with the first priority being a quality service to all consumers.

1.1. Understanding how suppliers can meet consumers' needs in the future energy system (energy)

5 respondents commented on this project. 3 responses were positive and 2 were neutral.

Committee on Fuel Poverty

The Committee asked for consideration of how to improve consumer understanding of energy tariffs in order to boost switching among people on lower incomes.

Energy UK

Energy UK believes Citizens Advice's efforts combined with its own work can help improve understanding of disengaged consumers, using this analysis to address the lack of consumer trust in energy suppliers. Energy UK also supported the continuation of our work on the Star Rating as a respected indicator of supplier customer service performance, and expressed interest in working with us on next steps for reputational incentives.

Ofgem

Ofgem welcomed Citizens Advice's work on how the regulator and energy companies can work to meet the needs of all consumers, and recognised the need to increase trust in the energy market to help consumers participate actively. Ofgem welcomed our proposals to continue examining different approaches to market reform and their impacts on consumers, particularly those in vulnerable circumstances.

Trust Alliance Group

Trust Alliance Group welcomed our focus on how energy suppliers can meet consumers' needs, as well as effective consumer representation. It looked forward to working with Citizens Advice and Ofgem through the Tripartite working group.

UKPN

UKPN argued that minimising network costs overall should be a key policy objective to spread the benefits of supplier specialisation and flexibility.

We adjusted our work plan to take account of the feedback provided.

1.2. Effective consumer interest representation in an evolving energy landscape (energy)

9 respondents commented on this project. 5 responses were positive and 4 were neutral.

Committee on Fuel Poverty

The Committee agreed that the smart meter rollout offers opportunities to provide targeted support to those in fuel poverty, and sees greater smart meter coverage as key to future arrangements.

Department for Energy Security and Net Zero (DESNZ) - Smart Meter Implementation Programme (SMIP) team

The SMIP team asked for more detail on Citizens Advice's view on the Market Wide Half Hourly Settlement, including any hopes and concerns around the programme.

Elexon

Elexon acknowledged the benefits the Market Wide Half Hourly Settlement can bring, and emphasised its commitment to working with the wider industry to ensure the MMHS is delivered successfully.

Energy UK

Energy UK encouraged Citizens Advice to continue supporting the rollout of smart metering and the Market Wide Half Hourly Settlement programme, focusing on benefits to vulnerable customers as well as consumers more widely. It also argued for the importance of case studies showing positive experiences of customers with existing smart meters.

Laura Sandys

Laura Sandys supported Citizens Advice's work and suggested the need for horizon scanning around the impact of new financial products in the energy space and potential

regulatory models. She also cited the need to measure performance in the sector using metrics such as consumer satisfaction and Ombudsman referrals.

National Gas Transmission

National Gas Transmission noted Citizens Advice's plans to work with the Future System Operator and scrutinise code modifications. It asked for further information on our approach to ensure that gases get sufficient attention, including details on timelines and milestones.

NEA

NEA supported Citizens Advice's wider focus on future-proofing markets to meet evolving challenges. It highlighted the need to develop the energy price cap to ensure it is fair for consumers, and reduce payment premiums in the market.

NEA also noted the importance of the debate around reforms to default tariffs in light of the Market Wide Half Hourly Settlement, and would welcome working closely with us to ensure the best outcomes for fuel poor households. It asked us to consider how to evolve default tariffs to safeguard vulnerable households through the energy transition.

NEA further encouraged us to consider targeted solutions around standing charges, particularly for prepayment customers.

Ofgem

Ofgem welcomed working with Citizens Advice to ensure code reforms are effective and consider consumer needs in a changing energy system.

UKPN

UKPN agreed that it would be extremely important for Citizens Advice to work with the Future Systems Operator to ensure that consumer interests aren't overlooked and that network costs are central to plans. It highlighted that consent for data sharing as part of the Market Wide Half Hourly Settlement would be a key to innovation in encouraging flexibility and designing measures to alleviate fuel poverty.

We adjusted our work plan to take account of the feedback provided.

1.3. Monitoring the effect of the Consumer Duty (consumer)

3 respondents commented on this project. Feedback was generally positive about Citizens Advice monitoring the effect of the Consumer Duty.

ACRE (Action with Communities in Rural England)

ACRE emphasises the importance of the bank branch network, noting that some gains through the Consumer Duty could be lost through the push to digitisation which may not be well aligned with consumers' needs. This emphasises the importance of looking at the Consumer Duty in the wider context.

Ofgem

Ofgem welcomed Citizens Advice's proposed work to review the Consumer Duty and its effects on consumers. It was particularly keen to understand how companies have implemented changes and any improvements to consumer outcomes.

CCW

CCW supports the decision for Citizens Advice to review the Consumer Duty, and welcome findings from this exercise in the context of the new Customer Licensing Condition for water companies.

1.4. Supporting microbusiness consumers (energy)

2 respondents commented on this project. Both responses were positive.

CCW

CCW supported Citizens Advice's proposed work on behalf of microbusinesses and our commitment to work to extend services if required.

Ofgem

Ofgem welcomed Citizens Advice's continued focus on issues for microbusinesses and our commitment to expand our advice and advocacy services if required. It highlighted our input to stakeholder groups and voluntary commitment work with suppliers as particularly valuable, and noted that business customers could be a key focus in our work on harnessing innovation to build fairness - particularly in areas such as flexibility.

1.5. Understanding postal consumers' evolving needs (post)

7 respondents commented on this project. 6 responses were positive, and 1 was neutral.

DHL

DHL remains supportive of our parcels work.

Rural Services Network (RSN)

The RSN wants to know what consumers and businesses value most from the Universal Service Obligation (USO). They'd also like to know how this differs in rural areas.

Apex Insight

Apex Insight wants us to continue to focus on the importance of parcel shops and lockers. They believe parcel problems have yet to reduce with more people working from home. They also questioned the impact on consumers from the concentration of parcel carriers.

Royal Mail

Royal Mail states that reform of the USO is urgent to meet customers' evolving needs. This is as people shift from letters to parcels. They urge Citizens Advice to avoid duplication by looking at the existing work in this area.

CWU

The CWU would find this research helpful due to the lack of robust data on postal users' needs. They think the nature of the parcel delivery market is impacting the environment. They also want more focus on environmental, social, and governance issues to improve unregulated parcel companies.

Mail Competition Forum (MCF)

The MCF agrees with the broad aims of our work on the postal market. They ask that our work adds to understanding consumers and doesn't duplicate Ofcom's work.

Department for Environment, Food and Rural Affairs (DEFRA)

DEFRA raised concerns about the loss of the USO and doorstep deliveries in rural areas.

1.6 Designing a regulatory framework fit for the future (post)

7 respondents commented on this project. 5 were positive and 2 were neutral.

DHL

DHL remains supportive of our parcels work.

Apex Insight

Apex Insight agrees with our assessment of Ofcom and supports our plans in this area.

Action with Communities in Rural England (ACRE)

ACRE wants Citizens Advice to champion the needs of smaller segments of the population, which may be less profitable for large providers to serve. They want us to press the government and regulators to ensure commercial providers offer all consumers with a quality service, through cross-subsidy from more profitable areas (such as parcels) if necessary.

Royal Mail

Royal Mail continues to advocate for a modern and sustainable USO that allows them to shift from letters to parcels. They mention the importance of the regulatory system adapting to changing consumer needs. They will continue to engage with Citizens Advice and other consumer advocacy bodies.

CWU

The CWU thinks the lack of quality standards for unregulated parcel companies impacts consumers. They want regulation to level the playing field and raise service standards across the board.

Mail Competition Forum (MCF)

The MCF agrees with the broad aims of our work on the postal market. They ask that our work focuses on adding to our understanding of consumers and doesn't duplicate Ofcom's work.

Department for Environment, Food and Rural Affairs (DEFRA)

DEFRA raised concerns about Royal Mail's performance and the potential loss of the USO. Their particular focus is on doorstep deliveries in rural areas.

2. Addressing affordability issues in essential markets

2.1. A market safety net for essential services (consumer)

4 respondents commented on this project. 3 responses were generally positive and 1 was neutral - beyond these responses there was also wider support for Citizens Advice addressing affordability issues within consultation responses.

CCW

Agree that there needs to be a safety net in place for affordable access to essential services, and emphasise the importance of targeted bill support. This work is aligned with their aim to end water poverty.

Committee on Fuel Poverty

The Committee highlighted that while it has responded positively to proposals for a multi-sector priority services register, it believes there is a lack of shared definitions of vulnerability and a need for consumer trust and safeguards.

Elexon

Elexon emphasised its commitment to supporting the Government and Ofgem on projects to support consumers while delivering a secure and affordable future energy system.

Ofgem

Ofgem provided general support for Citizens Advice working on fair prices, with protections for vulnerable consumers.

2.2. Fair value for consumers in essential markets (consumer)

4 respondents commented on this project. Those who commented were generally supportive of Citizens Advice prioritising this area, 2 respondents shared ideas on issues they would like to see Citizens Advice include within this work that were not explicitly referenced in the draft document.

CCW

Agree with our proposed work on fair value, and state that where costs do need to increase this should align to better services and should be visible to consumers. This work will align with their 2024/25 work on “Value from the Price Review”.

ACRE (Action with Communities in Rural England)

ACRE encouraged Citizens Advice to think about road fuel markets within this work, in particular noting that customers in rural areas may have less access to competing providers, and risks that retailers will compete in price in urban areas and seek to recover costs in rural areas. They encourage Citizens Advice to keep a watching brief on this issue.

Ofgem

Ofgem supported and welcomed Citizens Advice’s role in monitoring, identifying and advocating for improvements in service delivery, and agreed that consumers should expect good outcomes in the energy market. Ofgem described our role in identifying poor consumer outcomes as an invaluable addition to its own work to improve consumer experience.

Crisis

Crisis support our focus on addressing affordability in essential markets, and encouraged Citizens Advice to incorporate a focus on rental costs in this work, given rising rental costs.

2.3. Preventing self-disconnection (energy) - now Making prepay work better for consumers

5 respondents commented on this project. All 5 responses were generally positive.

Committee on Fuel Poverty

The Committee welcomed Citizens Advice’s proposals to reduce the numbers of consumers who are self disconnecting for three hours or more. It highlighted the need to build trust in energy suppliers to facilitate switching to smart metering.

Energy UK

Energy UK supported efforts to reduce prepayment meter disconnection through intervention and monitoring. It believes in the importance of differentiating between different types of disconnection to address root causes, without negatively impacting prepayment as a payment method. Energy UK also highlighted a collaboration

opportunity to prioritise some customers in getting a smart meter, as part of a wider narrative around replacing legacy prepayment meters with smart.

NEA

NEA was pleased to collaborate with Citizens Advice on our work around the involuntary installation of prepayment meters. It highlighted the importance of monitoring to ensure that new Ofgem rules are being adhered to, asking our energy policy team to work with local offices to provide compliance level data to Ofgem.

Ofgem

Ofgem agreed with Citizens Advice's concerns around the impact of self-disconnections on consumers with traditional prepayment meters. Ofgem highlighted its work around delivering smart meters to traditional prepayment meter customers, and welcomed our support in improving outcomes for vulnerable consumers in this space.

We adjusted our work plan in response to feedback provided.

2.4. Targeted bill support in an era of higher energy bills (energy)

4 respondents commented on this project. 2 responses were positive and 2 were neutral.

Committee on Fuel Poverty

The Committee agreed on the need for better targeted bill support for people in fuel poverty.

NEA

NEA supported Citizens Advice's recommendations for targeted bill support in our 'Fairer, Warmer, Cheaper' work, and hoped that we will continue to argue for this support for low-income households.

OVO Energy:

Ovo Energy asked Citizens Advice to work with suppliers to influence decision-making around a social tariff, as well as the methodology around the price cap and inequities related to standing charges.

UKPN

UKPN said that policy should focus on reducing overall system cost and creating the right incentives, while considering the effect of different changes to target support.

We updated our work plan to reflect our most recent reports and in response to feedback.

2.5. Making sure essential postal services are affordable (post)

6 respondents commented on this project. 4 were positive and 2 were neutral.

Rural Services Network (RSN)

The RSN said it's important the price cap for second class post remains in place. They said no price cap would price out people on low incomes. The RSN thinks the difference between online and in-person postal prices penalises people without internet access or digital skills.

Apex Insight

Apex Insight highlights that the best parcel prices are online and that this is important to explore. They believe the difference between online and in-person parcel prices will grow. This is due to carriers and comparison sites becoming more competitive.

Royal Mail

Royal Mail notes the retention of the second class safeguard cap until 2027 and the importance of post to vulnerable consumers. They remain committed to working with stakeholders to maintain the universal and affordable 'one price goes anywhere' service. Royal Mail asks that our work in this area doesn't duplicate our previously completed work.

CWU

The CWU recognises affordability is key to an accessible universal postal service. But they also think prices must reflect the cost of maintaining a universal network. This includes frontline postal jobs to deliver a high quality service to meet the needs of all users.

Mail Competition Forum (MCF)

The MCF agrees with the broad aims of our work on the postal market. They ask that our work focuses on adding to our understanding of consumers and doesn't duplicate Ofcom's work.

Crisis

Crisis supports our work protecting consumers from discrimination and disadvantage. They understand why we focus on the cost of postal services to address affordability in essential markets.

3. Infrastructure that delivers value for consumers

3.1. Delivering value for money net zero infrastructure (energy)

5 respondents commented on this project. All the responses were generally positive.

Committee on Fuel Poverty:

The Committee supported Citizens Advice's call for better transparency around costs and value. It highlighted that there is currently a lack of focus on how to reach net zero while meeting fuel poverty targets and ensuring a just energy transition.

Elexon:

Elexon agreed with the need to manage net zero infrastructure to ensure value for money and good consumer outcomes. It supported the principle of minimising costs but highlighted the need to assess value rather seeking to implement net zero at 'least cost', and consider existing infrastructure and systems where suitable so that changes are implemented smoothly and quickly. Elexon looked forward to collaborating further to ensure consumer interests are represented.

Ofgem

Ofgem welcomed Citizens Advice's role in scrutinising the process of setting the new RIIO-3 price controls for Transmission and Gas Distribution. It also welcomed our continued contributions through stakeholder engagement channels and our role in supporting the design of new Regional Energy Strategic Planners. Ofgem supported our continued work with it, energy networks and local authorities to ensure a joined-up and consumer-centred approach to local planning.

SSEN

SSEN supported Citizens Advice's work with local authorities and energy networks to centre consumers in local delivery of net zero through Local Area Energy Plans (LAEPs) and called for a 'Net Zero First' approach to investment. It expressed concerns that an interim model of the Regional Energy Strategic Planner (RESP) would be required to avoid losing momentum.

UKPN

UKPN said that Citizens Advice would have an important voice in ensuring that consumer interests are defended on this issue. It argued for an agile approach based on network intelligence, allowing demand to be met through flexibility rather than network reinforcement where possible.

3.2. Monitoring network performance (energy)

2 respondents commented on this project. Both responses were positive.

Ofgem

Ofgem agreed with Citizens Advice's emphasis on the importance of monitoring network company performance. Ofgem also supported our commitment to work with it and network companies to provide further transparency and comparability of network performance.

UKPN

UKPN welcomed Citizens Advice's analysis of network performance, saying it provides recognition for good performance and insights for remedial action when necessary.

3.3. Making the most of innovation funding (energy)

3 respondents commented on this project. All the responses were positive.

Elexon

Elexon supported Citizens Advice's approach and emphasised its commitment to embedding innovation into the Balancing and Settlement Code.

Ofgem

Ofgem shared Citizens Advice's focus on ensuring innovation funding is used to address challenges and protect consumers, and the importance of setting the right challenges for the market to address through innovation. It welcomed our input into policy development for innovation with RII0-3 and the development of its most recent Strategic Innovation Fund Challenges.

UKPN

UKPN said that Citizens Advice's proposed analysis would likely be a useful contribution to future policy discussion. It highlighted two types of innovation through either

investment in business efficiency, or riskier innovation requiring specific incentive programmes.

3.4. Holding Royal Mail accountable for delivering for consumers (post)

3 respondents commented on this project. 2 were positive and 1 was neutral.

Royal Mail

Royal Mail says its quality of service hasn't been where it should be. They pointed to actions taken to improve the situation. They also mentioned that they will continue to engage with Citizens Advice and other stakeholders on the issue.

CWU

The CWU points to concerns raised with Ofcom and the government about Royal Mail's delivery failures. The CWU wants a reformed Ofcom to take responsibility for long-term investment in the USO to meet the needs of all postal users. This includes those in vulnerable circumstances and living in rural areas. The CWU wants these areas prioritised over price competition and cost-cutting efficiency measures.

Mail Competition Forum (MCF)

The MCF agrees with the broad aims of our work on the postal market, including the quality of service crisis that we have highlighted. They ask that our work focuses on adding to our understanding of consumers and doesn't duplicate Ofcom's work.

3.5 Monitoring performance in the parcels market (post)

4 respondents commented on this project. 3 responses were positive and 1 was neutral.

DHL

DHL remain supportive our parcels work.

Royal Mail

Royal Mail recognises that the parcels market must work well for consumers. This includes disabled people. They referenced their ranking in our recent parcels league table. They also mentioned their service now allows people to register their needs for deliveries and collections.

Yodel

Yodel shared some information on their initiatives to improve consumers' parcel delivery experiences. They welcomed future conversations with us to ensure they provide the best service.

Mail Competition Forum (MCF)

The MCF agrees with the broad aims of our work on the postal market. But as they represent different stakeholders within business and the supply chain, they're unlikely to agree with our consumer-focused view on how to address parcel delivery issues. They ask that our work focuses on adding to our understanding of consumers and doesn't duplicate Ofcom's work.

3.6 The future of the post office network (post)

6 respondents commented on this project. 4 were positive and 2 were neutral.

Rural Services Network (RSN)

The RSN welcomes our plans to make the case for continued government subsidy. The RSN raises concerns about the viability of smaller post offices. They hope we continue to track unnoticed trends in the post office network. This includes the growing number of part-time outreach services in rural areas.

Action with Communities in Rural England (ACRE)

ACRE welcomes our proposed work on the post office network. But, they would like to see us carry out separate work on the role of the banking and the post office network, pointing out that access to cash is not the only issue associated with the closure of many rural bank branches.

Ryman

Ryman thinks post offices are hubs and footfall drivers in local communities and high streets. But they highlight that the pressures facing post office operators can lead to cost-cutting and poorer service.

Royal Mail

Royal Mail recognises the importance of post offices to vulnerable consumers and those living in rural and remote areas. They urge us to collaborate with other consumer

advocacy bodies to avoid duplication. Royal Mail will continue to engage with us and other stakeholders to ensure customers have the best access to postal services.

CWU

The CWU emphasises the important economic and social value of post offices. They raise concerns about the impact of fewer Crown branches and reduced government subsidy. The CWU thinks the government must do all in its power to rescue the post office network as a vital public service. They also think better subpostmaster remuneration would reverse the rise in branch closures.

Department for Environment, Food and Rural Affairs (DEFRA)

DEFRA raised concerns about part-time outreach services in rural areas. They're also worried about the impact of new banking hubs and the attention given to post offices' long-term future.

4. Harnessing innovation to build fairness into services

4.1. Ensuring consumers have access to the products, services and support they need in an increasingly digital world (consumer)

3 respondents commented on this project. 2 responses were positive and 1 was neutral.

ACRE (Action with Communities in Rural England)

ACRE notes the importance of representing populations who may find adaptation to new services difficult or impossible, and urge Citizens Advice to emphasise the importance of organisational preparation when digital innovation projects are being undertaken, so that citizens don't pay the price for poor preparation.

Ofgem

Ofgem shared Citizens Advice's concerns around consumers' access to support and services, and would welcome further work with us if monitoring identified required improvements or non-compliance with rules.

Utilita:

Utilita commended Citizens Advice's focus on ensuring that consumers have access to the products and services that meet their individual needs, citing its own Energy Hubs that provide outreach to those without internet access.

4.2. Harnessing innovation to alleviate fuel poverty (energy)

5 respondents commented on this project. 4 responses were positive and 1 was neutral.

Committee on Fuel Poverty:

The Committee welcomed Citizens Advice's focus on improving take-up of energy efficiency schemes among people in fuel poverty, and anticipates our work on identifying the required support to improve access. It asked for our work on maximising insights from metadata to link with other hyper-local datasets.

Department for Energy Security and Net Zero (DESNZ) - Smart Meter Implementation Programme (SMIP) team

The SMIP team noted Citizens Advice's proposals around exploring metadata and highlighted its interest in our insights on the impact of smart meters on fuel poverty and self-disconnection, as well as our views on how stakeholders could further engage with vulnerable consumers on smart metering.

Ofgem

Ofgem welcomed Citizens Advice's commitment to explore consumer experiences using Data Communications Company data. It would welcome further evidence on the experiences of customers struggling to pay, including building understanding through the tripartite agreement. Ofgem cited the opportunities and challenges in the increase in big data, as well as opportunities for innovative measures to address fuel poverty through schemes such as the Warm Home Discount and Energy Company Obligation.

UKPN

UKPN said that harnessing innovation to alleviate fuel poverty would require regulatory incentives or specific funding streams.

Utilita:

Utilita welcomed Citizens Advice's proposals on maximising metadata and recognised the value of data-driven approaches in addressing challenges for prepayment meter customers. It expressed its keenness to share its own learnings in this space and contribute to the work.

4.3. Making sure consumers benefit from future services - flexibility & retrofit (energy)

4 respondents commented on this project. 2 responses were positive and 2 were neutral.

Elexon:

Elexon supported Citizens Advice's initiatives to embed fairness and safeguard consumers. It highlighted the need to protect consumers who are unable to participate in flexibility from penalties, while ensuring those capable of participating are rewarded. Elexon also emphasised the design principles needed for the incoming market facilitator for flexibility, including robust consumer representation.

Ofgem

Ofgem agreed that changes to homes and the energy market may be needed to meet Net Zero. Ofgem said it would continue to work with Citizens Advice and other

stakeholders to ensure there is a clear strategy to unlock consumer flexibility, and work to identify undue barriers or harm to consumers using smart energy appliances.

Trading Standards

Trading Standards argued for the need for licensing for businesses providing green heating services, and independent auditing for work carried out using grant funding.

UKPN

UKPN said that incentives for flexible consumption would need to be aligned between ESO, DSOs, suppliers and consumers - with strong DSO incentives at distribution level.

Following feedback we amended this section of our work plan to make it clear that we support, and will advocate for, mandatory consumer protections in the net zero retrofit market.

4.4. Protecting consumers from digital design harms (consumer)

4 respondents commented on this project. They were supportive of work in this area, both in relation to Online Choice Architecture and AI.

CCW

CCW report that they are keen to understand more about Citizens Advice's horizon scanning work in relation to AI, and identifying risks and opportunities for consumers. They believe shared experience and understanding will be beneficial as AI becomes more prevalent.

Committee on Fuel Poverty:

The Committee welcomed Citizens Advice's proposed horizon scanning work around Artificial Intelligence and highlighted the link to its own work on using data and machine learning to identify risks and opportunities for consumers.

Ofgem:

Ofgem supported Citizens Advice's push to improve digital design outcomes and advocate for inclusive design. It appreciated our input and collaborative work in areas where policy development could be made more inclusive.

Trust Alliance Group

Are supportive of Citizens Advice undertaking work to protect consumers from design harms, particularly those that are contributing to poorer outcomes for consumers in vulnerable circumstances. Trust Alliance Group also welcome horizon scanning work in relation to AI, and encourage collaboration around shared insights into the impact of AI on consumers.

4.5. Ensuring networks deliver for at-risk customers (energy)

4 respondents commented on this project. All the responses were positive.

Committee on Fuel Poverty:

The Committee welcomed Citizens Advice's proposed research into energy networks' response to at-risk customers. It also welcomed our proposed evaluation of projects to assist customers on the Priority Service Register, but suggested that taking a broader view of vulnerability would help the research access a more pertinent demographic.

Ofgem

Ofgem strongly supported Citizens Advice's input into a multi-sector priority services register (PSR) and welcomed our proposed research evaluating PSR projects in networks.

SSEN

SSEN agreed that the energy transition should be accessible, inclusive and responsive.

UKPN

UKPN welcomed Citizens Advice's proposed research on evaluating the effectiveness of projects to support people on the PSR and understanding consumer needs, saying this would help improve targeting in future.

4.6. Making post a truly universal service for all consumers, even the most marginalised (post)

5 respondents commented on this project. All responses were positive.

Friends, Families and Travellers (FTT)

FTT highlights the importance of having access to post, and the fact the issue is often overlooked. This ensures people receive important communications from healthcare,

benefit, and housing services. They think the Address & Collect service could make a huge difference to communities who do not have access to their post.

Shelter

Shelter believes post exclusion affects many people who are homeless and living in temporary accommodation. They think the Address & Collect service would make it easier for these people to access post. They also think the service would relieve some of the stress with moving accommodation regularly.

Royal Mail

Royal Mail supports the work of the consumer advocacy bodies to address the difficulties faced by people without a fixed address. Royal Mail will engage with us on the findings from our research. They want any new research to help make progress on the service which has been a key theme of the consumer advocacy bodies' work in recent years.

CWU

The CWU raises concerns about the number of people in the last decade who haven't been able to access their post. They agree that there needs to be a solution to prevent exclusion from an essential service. The CWU thinks post offices could be part of this. But they also think postmaster consultation is important to ensure a successful service.

Crisis

Crisis will continue to support us to find a solution for people who can't access their post.

5. Index of responses

ACRE (Action with Communities in Rural England)

Apex Insight

British Gas (verbal comments)

Committee on Fuel Poverty

CCW

Communication Workers Union (CWU)

Crisis

Department for Energy Security and Net Zero (DESNZ) - Smart Meter Implementation Programme (SMIP) team

Department for Environment, Food and Rural Affairs

DHL

Elexon

Energy UK

Friends, Families and Travellers (FFT)

Laura Sandys

MCF

National Gas Transmission

National Energy Action (NEA)

Ofgem

OVO Energy

Royal Mail

Rural Services Network

Ryman

Shelter

SSEN

Trading Standards

Trust Alliance

UK Power Networks (UKPN)

Utilita

Trust Alliance Group

Women's Aid

Yodel