

Citizens Advice Response to DESNZ's Policy Proposals for VWAN and Further Consultation on Licence and SEC Changes



About us

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.

Response

In our response to the first VWAN consultation we highlighted the potential benefits of VWAN for engaged consumers who understood how this new system would work while also raising concerns about the significant potential detriment for prepayment customers using VWAN solutions if they go off supply¹. These concerns remain. As such we welcome the decision to ensure that VWAN cannot be used where prepayment has been or is to be installed without the consent of the consumer. This will help mitigate some of the worst possible outcomes of allowing the use of consumers' broadband to connect smart meters.

Even with this change, prepayment through VWAN will still have to be handled with great care and closely monitored. Suppliers should be required to monitor and report on VWAN self-disconnection rates and take action where consumer detriment is occurring. If this does not happen we would expect DESNZ and the regulator to step in. Examination will also be needed into how energy suppliers record a switch to prepay as voluntary to ensure it is consistent and capturing data in a way that reflects the experience of consumers.

Before VWAN is considered for any prepayment customer their supplier should undertake an evaluation of how often the household self-disconnects. If they do so with any frequency then VWAN should be deemed inappropriate for that household.

In Annex 2 we note that in section 28.1 the addition of a requirement to inform prepayment consumers of the consequences of VWAN self-disconnection and the processes to get back on supply. While consumers should be made aware of the risks there is also a need to ensure that there are clear processes in place to mitigate the potential detriment these consumers will face if they disconnect. The onus cannot simply be on consumers to understand the risks.

In section 49.26 of Annex 2 we would note a possible typographical error, the text in the draft document reads: *"recover such costs from is Customers generally as an incremental charge for electricity or gas supplied to them"* - we take this to be intended to mean that costs will be recovered by suppliers through general

¹ [Citizens Advice response to DESNZ's Policy Framework for Smart Metering Systems Connected to the DCC via the Consumer's Internet Connection](#) (2025)

billing of all customers. I.e. socialised across the supplier's customer base but would welcome confirmation of this.

Later in this section we note the potential to charge consumers for a VWAN device with "enhanced functionality" - we are unclear as to what this may be. If the enhanced functionality is providing additional consumer benefits we would question why it is not the default. If it is for additional accessibility - for example an enhanced or more usable interface for those with additional barriers - then we would not expect this to incur an additional cost just as there is no additional cost for consumers to receive an accessible in-home display.

There remain broader issues which will need to be addressed before the rollout of VWAN - these were raised in our earlier consultation response² but we would particularly note the challenges raised by the accountability gap between the DCC and energy suppliers (and now potentially ISPs). We're also concerned about the additional needs of those in the private rented sector where suppliers often have less sense of who is renting a property, and whether VWAN will be safe and appropriate for them. There are likely to be issues with properties going off-supply between tenancies. It may be appropriate for suppliers to place the meter into credit mode and then evaluate whether VWAN prepay remains safe and appropriate for the new occupier.

We look forward to discussing these challenges as the VWAN solution develops.

² [Citizens Advice response to DESNZ's Policy Framework for Smart Metering Systems Connected to the DCC via the Consumer's Internet Connection](#) (2025)

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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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