

Consumer advocacy and advice at Citizens Advice

Consumer work plan 2025/26



citizens
advice

Foreword



This is our first consumer work plan published under a new government and in it we look to the future of consumer protection in a range of markets where we anticipate substantial changes in the next few years.

To achieve the ambitious changes that the government has set out in its manifesto and its missions, the voice of the consumer must be heard loud and clear. As the government drives economic growth, there is a need to understand how this can be achieved while also maintaining high standards and strong outcomes for consumers. This is a critical role which we can play as a statutory consumer advocate.

One area where we see this role being essential is in the heat networks market where we will the statutory consumer advocate in the coming financial year.

The government wants to oversee rapid and far-reaching changes in the energy market, particularly to support the transition to net zero, but these changes are unachievable without building consumers' confidence in these measures.

In our wider statutory consumer advocacy roles in energy, post and cross-cutting consumer issues, Citizens Advice has a key part to play in ensuring that markets are fair for consumers. We'll be taking a deeper look at whether the approach taken by regulators is agile and effective enough to safeguard people in times of significant change. This will include building on the Consumer Duty approach taken by the Financial Conduct Authority and investigating its applicability to markets outside financial services.

Many of the problems caused by the cost-of-living crisis continue to have a long afterlife and be a source of detriment for consumers, particularly in the energy market where price spikes in the last 3 years have left a painful legacy of debt for millions. Our policy work will continue to shine a light on the issues that people face as a consequence of these shocks, and we will further explore wider issues regarding the affordability of bills for essential services.

In relation to energy, this debt hangover leaves people at risk of rationing and disconnection, and holds back engagement and competition in the market. We're working with the Government and charity partners to build on our consumer service helpline with expanded access to debt advice, helping people find sustainable and holistic solutions for their debt problems.

In recent years, there has been an extraordinary amount of volatility in consumer markets. The pace of change in technology, in the government's legislative agenda, and the fact that many markets are now global in nature means that unpredictability will continue. But through all this change, Citizens Advice has been - and will continue to be - a consistent and clear champion for the rights of all consumers.



Dame Clare Moriarty

Chief Executive Officer, Citizens Advice



A robust and impactful approach

As an advocate working for consumers, we do everything we can to maximise our impact and to make decisions based on evidence. To guide our thinking, we have designed our work plan on the basis of **4 principles**.

1. Our work is proportionate to the evidence or risk of consumer detriment

We build our work plan on the principle of proportionality. To do this, we focus our efforts on areas where we have reason to believe detriment to consumers could be averted. We assess the need for action against 6 core outcomes that characterise a successful consumer market.

6 core outcomes that characterise a successful consumer market

Value	Products and services are good value for money
Inclusive	All consumers are served well, including those in vulnerable circumstances
Quality	Consumers get what they pay for. Their reasonable expectations are met or exceeded
Redress	If things go wrong, they're put right quickly, with compensation where appropriate
Protected	Products and services are safe and secure to use
Sustainable	The needs of current consumers are met without jeopardising the needs of future generations

2. We apply unique insights, adding value over and above other organisations

We ensure our work adds value that is additional to that provided by other organisations.

A key aspect of this is our data. We have millions of contacts with consumers through our Consumer Service, Extra Help Unit and local Citizens Advice offices. We use this to inform our advocacy work and develop solutions to the problems people face.

Another aspect is the cross-cutting perspective we provide. The value of this is increasing as technology blurs boundaries between markets. Regulators and consumer advocacy bodies must increasingly learn lessons and develop solutions across sectors. To reflect this, this year's work plan is again designed around cross-cutting themes rather than specific markets.

3. We engage consumer groups, government and regulators to avoid duplication

We want to have an open and substantive conversation about the work we do and how we do it. The consultation on the draft work plan is the first step in this. But this isn't a one-off process.

This work plan is a living document and we will meet regularly with regulators, industry, other consumer bodies and charities, and government officials to discuss and refine our work throughout the year. We engage in many formal processes to embed our work in the wider context, avoid duplication, and make sure we complement the work of like-minded organisations.

4. We focus on outcomes, using both advocacy and research to shape decisions

While there are many positive outcomes from our work, the most tangible and measurable are better financial returns for consumers.

As well as immediate financial benefits, we look to the long term and prevent costs for consumers before they arise. In recent years our work has paid dividends on this.

How our advice and advocacy roles support each other

Our **advice provision** gives us unique insights into the problems people face, with real-time data.

We use this to advocate for evidence-based policy changes that deliver the biggest improvements in outcomes for consumers.

Advice provision

Our **local Citizens Advice offices (LCAs)** provide face-to-face advice on a range of issues in over 3,300 locations across England and Wales.

LCAs

The **Extra Help Unit (EHU)** is a specialist support service investigating complaints for domestic and micro business energy consumers, and postal service users, who are in vulnerable circumstances across Great Britain. The service is managed by Citizens Advice Scotland.

EHU

Other advice projects

Consumer service

Our **consumer service** gives advice on all consumer issues, with specialist advice on energy and post issues.

Policy and advocacy

Social policy



Cross sector consumer policy

Post policy

Energy policy

Our **policy and advocacy work** gives us insight into the organisations and systems consumers deal with and into the emerging risks for consumers.

This helps us provide advice and support that is up-to-date and effective.

 Non-statutory role
 Statutory role

Equity, diversity and inclusion (EDI)



We have continued to make progress against our 3 equity, diversity and inclusion commitments:

Integrating **equality by design** into every major advocacy project we undertake

Doing regular stock takes of our data to understand how our clients' problems map against protected characteristics to **identify any gaps** in our advocacy work

Ensuring at least one of our policy changes each year has **a positive impact on groups who experience intense disadvantage**, detriment or harm

Relevant examples include:

- Commissioning a review to understand the extent of behavioural research into how online choice architecture can disproportionately impact people in vulnerable circumstances
- Continuing to highlight the ethnicity penalty in car insurance to government, resulting such demographic impacts being part of the terms of reference for the new car insurance task force.
- Designing and advocating for a service to address the issue of post exclusion for people who lack a secure address. This could be due to homelessness or domestic abuse, or linked to specific groups such as Gypsy, Roma and Traveller communities.

To ensure that equity, diversity and inclusion considerations are at the heart of all our advocacy work, we have embedded a number of practices, including:

- Ensuring that EDI implications are outlined within every influencing plan - an influencing plan must be completed and signed off for every advocacy project at Citizens Advice, and they are reviewed regularly by our Leadership Team. This ensures EDI considerations are at the heart of our prioritisation processes
- Formally scoring competitive research tenders on their EDI considerations (and ensuring that these scores comprise at least 10% of the available marks)
- Creating an EDI in research checklist to ensure all our policy research projects are inclusive and accessible in design



Spotlight on

What we achieved in 2024/25



Cross-sector consumer



Energy

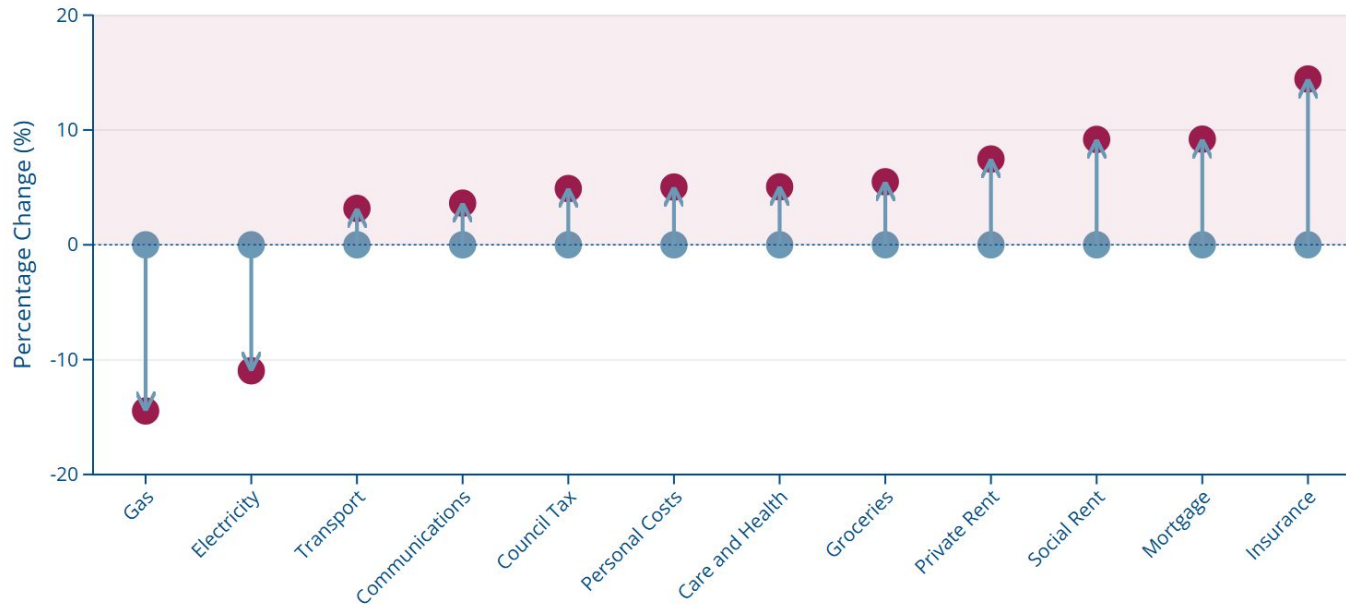


Post

 **Action on discriminatory pricing and car insurance affordability**

Following our 'Discriminatory Pricing: One Year On' report in March 2023, in July 2024 we published a further report putting the ethnicity penalty in the context of broader affordability issues in the car insurance market. We highlighted data showing that worrying numbers of people are being priced out of car insurance, which is an essential for the many households who rely on having a car to access work, education and healthcare. We also provided an updated figure for the ethnicity penalty, finding that people of colour are still paying an average of £307 more per year for their car insurance than white people. The report recommended that the government should swiftly instruct regulators to conduct a review of car insurance pricing, to determine the cause of rising prices in the market, examine the role of certain factors such as postcode pricing in driving higher premiums for certain groups, and explore a broad range of options for addressing issues around affordability.

Graph showing % change in essential expenditure categories amongst Citizens Advice debt clients from July 2023 (blue) to July 2024 (red)



In October 2024, the government announced a cross-government Task Force on Motor Insurance, with primary objectives including an evaluation of the impact of higher insurance premiums on certain groups, and identification of policies to address rising costs.



Ban on inflation-linked mid-contract price rises for telco consumers

Following our sustained advocacy on the issue of mid-contract price rises in telco contracts in 2022 and 2023, in December 2023 Ofcom published proposals to ban the use of inflation-linked in-contract price rise terms. Our research showing how poorly understood inflation-linked terms like CPI and RPI amongst consumers, and the need for clarity around pricing to allow people to budget effectively, was cited several times in Ofcom's proposals. We responded to Ofcom's consultation on the proposals in February 2024, reiterating the need to take action to protect consumers from these unfair contract terms - and in July 2024, Ofcom announced that it would be acting to prohibit the use of inflation-linked price rise clauses in telco contracts.



Improving disabled consumers' experiences of parcel deliveries

We've been calling for improvements in how disabled consumers engage with parcel services for the last few years. Our research has consistently found that disabled consumers rely more heavily on parcel deliveries and experience more problems. We're pleased that Ofcom agreed to introduce a new condition relating to accessibility to force parcel companies to introduce measures specifically for disabled consumers.

Our most recent research shows that more people are able to specify accessibility needs to parcel companies than they were last year, with only 12% of people unable to share their accessibility needs, compared to half the year prior. This is a clear result of the action taken by Ofcom and our research over the years advocating for disabled consumers.



Successfully advocating for consumers during the Universal Service Obligation review

Royal Mail has been requesting a reduction of its legal obligations under the Universal Service Obligation (USO) for several years. Ofcom agreed to review the USO in 2023 and published a discussion paper on the issue in January 2024.

Citizens Advice are not opposed to the review of the USO. However, the focus of Ofcom's discussion paper was almost entirely on the financial sustainability of the USO. Our concern was that this singular focus on Royal Mail's bottom line ignored the issues that were most important to consumers such as reliability and affordability.

Citizens Advice's submission to the USO review highlighted consumer concerns around the reliability and affordability of USO products. Following our input to Ofcom's review, Ofcom now has agreed to add a second phase to their USO review, looking specifically at these issues.



Reducing self-disconnection

Since March 2024, self-disconnection has fallen dramatically and is no longer the most common issue for contacting the Citizens Advice Consumer Service. The reduction in the energy price cap from April 2024, warmer weather for the time of year, and a substantial reduction in forced prepayment installations are all likely to have played a role, alongside changes to supplier contact ease and additional support credit provision. 2024 is the first year in which self-disconnection is not set to break records since at least 2019.

 **Moving a step closer to ending post exclusion**

After years of advocating for an end to post exclusion and the introduction of a service like Address & Collect to meet people's needs, we've managed to secure a cross-organisational roundtable led by Ofcom to push forward this work.

The roundtable brought together key stakeholders such as consumer bodies, the regulator, industry and government - to think about how we can work together to take meaningful action towards ending post exclusion. The outcome of this roundtable was for us to begin working towards a pilot, which brings us one step closer to making a service like Address & Collect a reality.

 **New protections in the flexibility market**

In 2024, we welcomed the Government's plan to introduce a licensing regime for the flexibility market and, in particular, the proposal to expand statutory advice and advocacy to this market. This is something we'd been researching and building evidence on for years. We assessed the risks and protection gaps in this market, called for a clear regulatory regime to help instil confidence in the market and set out the importance of information and advice for building an inclusive market.

 **Influencing the Digital Markets, Competition and Consumers Act**

Since 2022 we have been shining a spotlight on the various ways in which various digital design practices can contribute to poorer outcomes for consumers, and highlighting the opportunity for the government to introduce new protections for consumers via the Digital Markets, Competition and Consumers bill. Throughout the passage of what is now the DMCC Act we engaged with the Department for Business & Trade to secure good outcomes for consumers. which included sharing our insights on subscriptions and drip-pricing practices, which helped to ensure that new consumer protections around these practices were introduced as part of the Act. Since the passage of the Act, we have also contributed to the Subscriptions Working Group, to support DBT to consider consumer needs when implementing new rules.

The Extra Help Unit – supporting consumers in vulnerable situations

The Extra Help Unit (EHU), founded in 2008 and managed by Citizens Advice Scotland, delivers a statutory service supporting domestic and micro-business consumers in vulnerable situations with energy and postal complaints across Great Britain.

This includes supporting energy consumers who are off supply or at risk of being off supply due to affordability, technical or customer service problems. From December 2024 the Extra Help Unit will also support businesses meeting the criteria for the “small business” classification.

Licensed energy suppliers are obligated to have appropriate arrangements in place to manage EHU cases in a prompt and effective manner. As energy prices have increased by an unprecedented amount, along with the cost of many other household essentials, the EHU has fulfilled a vital role, supporting increasing numbers of consumers in vulnerable situations.

Credit was provided when necessary, reviewing the debt repayment rate, discussing the suitability of the prepayment meter and exploring other forms of support available. The EHU also supported 244 people through our Additional Support Project Team (between January and September 2024) to maximise income, enabling consumers to continue their journey in a trusted environment.



Between January and September 2024 the EHU:



Progressed 13,481 Priority Complaints where a consumer required immediate support.



Investigated 5,166 standard Complaints where the consumer needed the Unit to advocate on their behalf due to their personal circumstances or the complexity of the complaint.



Secured **£5,523,777** in financial redress, from support to assist consumers with short term affordability concerns, to reductions to bills resulting from billing errors and goodwill payments for service failures.

Cases logged under self-disconnection categories, where a household was unable to top up their prepayment meter due to affordability problems, accounted for 57% of all EHU cases investigated from January to September 2024 (11,724 of 20,577 combined Priority Complaints, Complaints and Enquiries). The EHU worked with energy suppliers to ensure additional support was provided in these cases.

The EHU engages with suppliers to improve policies and processes, as well as providing evidence and insight directly to the regulator Ofgem and policy teams within the Citizens Advice Service. A compliance case opened thanks to EHU raising concerns and evidence in 2023, was settled in September 2024 with [OVO Energy paying £2.4 million to consumers and the Energy Industry Voluntary Redress Scheme.](#)

The EHU has continued to evolve its service, introducing the use of AI to alert Caseworkers and Managers to issues requiring urgent attention have been identified in emails and case notes. This was the culmination of a project involving the Scottish Government funded Civ Tech Project, and the EHU working with Helpfirst. The project which went live on the EHU system in October 2024 is already delivering enhanced safeguarding monitoring for people using the service, supporting staff and protecting their well-being.

The EHU also received the verification certificate to confirm compliance with the BS ISO 22458 Inclusive Service Kitemark. In practice this means that the service has been recognised as supporting consumers in vulnerable circumstances in a flexible, accessible and inclusive way, building on the earlier British Standard 18477 the Unit had previously achieved.

The EHU continues to receive extremely positive feedback from the independent customer service satisfaction survey conducted by Accent. Between January and September 2024:

- **94%** of consumers surveyed said they were satisfied or very satisfied with the quality of service provided
- **78%** stated they felt less stressed after EHU support
- **83%** felt more confident in dealing with future issues

The comments provided by the service's clients during the survey also highlight the positive impacts the EHU has achieved:

"Coming from a mental health workers' point of view I felt that they communicated well and were patient and understanding of my clients' disabilities which was 'fab' and they were extremely professional."

"Unbelievable, I had been trying to sort out my problem for nearly two years, your service took my problem and reduced my utilities bill from £4000+ to £67! I could not recommend the service highly enough. Even if your service hadn't resulted in the huge reduction in my bill, the service still would have been outstanding."

"The help I received was exceptional. It took a huge weight off my mind to feel that there was someone who was on my side and deal with a very difficult situation. Because they were speaking to me like a human being and put me at ease when I was anxious."

"They were so nice. I am disabled and I find it hard to communicate but they were lovely."

Spotlight on our

Work plans for 2025/26



Cross-sector consumer



Energy



Post

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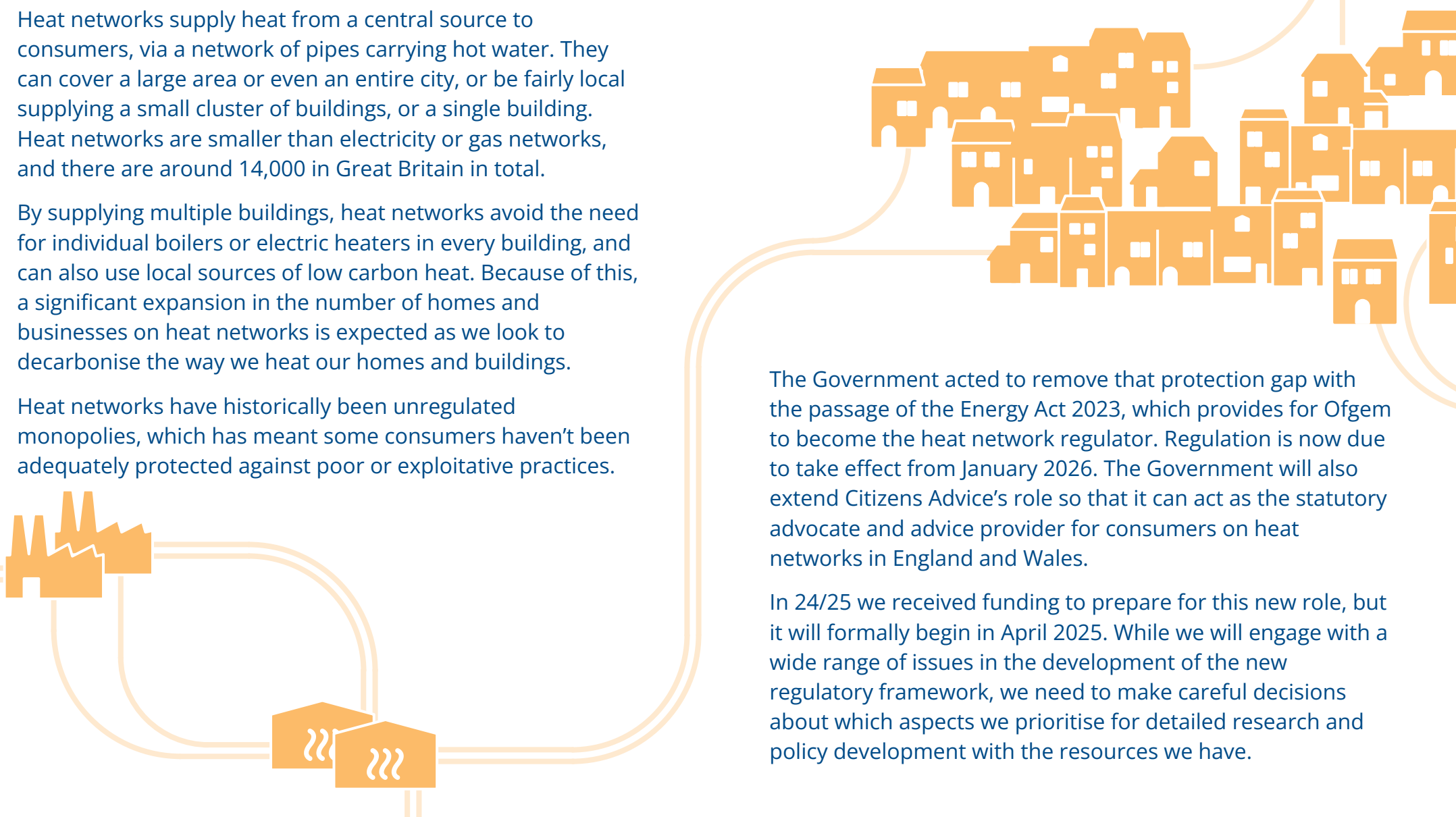


Delivering our new role as the heat network advocate and advice provider

Heat networks supply heat from a central source to consumers, via a network of pipes carrying hot water. They can cover a large area or even an entire city, or be fairly local supplying a small cluster of buildings, or a single building. Heat networks are smaller than electricity or gas networks, and there are around 14,000 in Great Britain in total.

By supplying multiple buildings, heat networks avoid the need for individual boilers or electric heaters in every building, and can also use local sources of low carbon heat. Because of this, a significant expansion in the number of homes and businesses on heat networks is expected as we look to decarbonise the way we heat our homes and buildings.

Heat networks have historically been unregulated monopolies, which has meant some consumers haven't been adequately protected against poor or exploitative practices.



The Government acted to remove that protection gap with the passage of the Energy Act 2023, which provides for Ofgem to become the heat network regulator. Regulation is now due to take effect from January 2026. The Government will also extend Citizens Advice's role so that it can act as the statutory advocate and advice provider for consumers on heat networks in England and Wales.

In 24/25 we received funding to prepare for this new role, but it will formally begin in April 2025. While we will engage with a wide range of issues in the development of the new regulatory framework, we need to make careful decisions about which aspects we prioritise for detailed research and policy development with the resources we have.



Ensuring the new regulatory framework meets the needs of heat network consumers of today and of the future

In the year ahead vital decisions will be made about the new regulatory framework which will profoundly affect the experience of heat consumers now and in the future. Our priority will be ensuring that the consumer voice is heard as these decisions are made, and that their interests are placed at the heart of the new framework.

We'll do this through responding to consultations, sitting on working groups and bilateral meetings with officials. We'll provide unique insights on the consumer experience of heat networks from our frontline advice services and research. We'll put forward practical recommendations developed through our extensive expertise within energy and broader essential services markets and engagement with stakeholders across the sector.

Deep dive research and policy analysis on issues which present the greatest risk of harm to consumers

In 2024/25 we decided to make debt and affordability our first area of focus. Since the energy crisis the affordability of energy bills and rising debt levels has been a major focus for the Government, consumers and the organisations which support them. As such, we expect these to be among the areas consumers care most about as regulation is introduced.

Relatively little is known about the experience of heat network consumers through the energy price crisis, and they benefit from very few of the protections present in the mains gas and electricity markets. To fill this gap, we launched a major research project on debt and affordability in the heat network sector.

We will continue this work in 2025/26 - publishing the findings of our research, working with stakeholders from across the sector to refine our recommendations and ensuring our insights are reflected in the new regulatory framework.

We also plan to carry out more detailed research and policy analysis on 2 additional priority areas - the reliability and quality of heat network services, and the experience of complaints and redress processes. We will consult widely with stakeholders in the scoping and delivery of these projects to minimise the risk of duplication and maximise opportunities for collaboration.

Refine and embed our ways of working as the statutory consumer advocate for heat networks

In 2024/25 we have made significant progress in understanding, refining and embedding our new role as statutory advocate for heat networks.

We have carried out a baseline review of the evidence currently available to us on the consumer experience of heat networks and taken forward work to begin to fill these gaps. We have expanded the breadth and depth of our stakeholder relationships in the sector, particularly with industry - giving us a more rounded understanding of the market and the challenges the sector faces. We've had useful foundational discussions with Ofgem, DESNZ, the Energy Ombudsman and Consumer Scotland about our respective roles in the new regulatory framework and how we will work together as effectively as possible in the consumer interest.

We will continue this work in 2025/26, further expanding our knowledge, insights and relationships across the sector. We will also work to finalise data sharing arrangements with Ofgem and other partners, and scope and establish a market monitoring function which reflects the unique features and complexities of the heat network market.

Understanding the advice needs of Heat Networks consumers

Building on our advocacy research, in 2025/26 we will use the early delivery of the heat networks advice service, and further research, to iterate and build ahead of regulation. We will do this by developing an understanding of consumers' current journeys as they navigate the Heat Network market. We will use these insights to inform what a tailored advice offer for Heat Networks consumers could look like in order to ensure that provision is available in line with the regulatory framework.

Our research will emphasise the need to support those who face additional barriers. We will collaborate with DESNZ, Ofgem, the Energy Ombudsman, Consumer Scotland, and our wider partners to maximise knowledge, best practise, and data to inform an insight-based and aligned approach. This work will be fundamental to ensuring that consumers are supported in line with the government's aim to grow the number and reach of heat networks as part of the net zero transition. We know from our existing statutory advice offer that working with consumers to access their rights and overcome the barriers they face helps us to build a powerful insight base to inform our advocacy work. Our advocacy work in turn identifies and advocates for broader reforms where needed, adapting to changing advice needs.

Future proofing markets to meet evolving challenges

The pace of change in the consumer economy is fast and ever-increasing. The need to decarbonise our economy will revolutionise the way we produce and consume energy. The postal service is transforming towards a parcels market with fewer people sending letters. Big Data is opening up new opportunities for companies to exploit consumer data, bringing opportunities for some but the prospect of discrimination and disenfranchisement for others. We will work to ensure that evolving consumer markets better meet consumers' needs across England, Wales and Scotland.



Regulatory reform

To ensure that consumers remain protected in rapidly changing markets and volatile economic conditions, it is essential that regulators have the ability and clarity of focus to be agile and act quickly. However, this is not always what we see in practice.

We will look at approaches being taken by different regulators to put consumer interests, and the consumer voice, at the heart of essential markets and consider whether some approaches should be applied more broadly, focussing in particular on Consumer Duties. We'll continue to explore the role a Consumer Duty can play in the energy market, while also looking at other sectors such as water and communications.

We will also consider how sector regulators and cross-sector regulators (eg EHRC, ICO) work together. Drawing on our previous work on the [ethnicity penalty](#) in insurance as a possible violation of equalities law as an example, we will consider the case for clearer responsibilities for sector regulators where there are overlaps in remit.



Putting consumer outcomes at the heart of postal markets

Consumers should expect reliable and efficient letter and parcel deliveries. But Royal Mail has failed to meet their quality of service obligations for nearly half a decade, while our third annual Parcels League Table found that consumers face poor service across the board. We've seen the significant impact on consumers from these problems, and in light of this we want postal services better focused on improving consumer outcomes.

In 2025/26 we'll interrogate the possibility of using regulatory models that have been used successfully in other essential markets, such as the Consumer Duty, to deliver more positive outcomes for consumers in postal markets. In doing so, we'll use our existing evidence and tactical research to build a picture of the wider state of the market, identifying areas of ongoing consumer detriment and the way in which regulation can be shaped to secure more robust protection from poor practice.



Preparing prepayment meter users for net zero

In Britain, approximately four million consumers use prepayment meters (PPMs). In the context of net zero, some PPMs may pose challenges as they are less compatible with more complex pricing structures, renewable integration and some lower carbon heating options such as heat pumps. Self-disconnection can damage the heat pump equipment, for example, and dynamic tariffs such as time of use pricing and other models have not so far been designed with PPM users in mind. We will look to understand the barriers to net zero initiatives and technologies for PPM users, to advise on how suppliers can ease the transition for this group of consumers. As part of this project, we will also seek to understand the experiences of consumers who want to switch to PPMs, but can't due to vulnerability.

Strengthening and protecting USO regulation

People still rely on letters to receive important messages from banks and hospitals, or to keep in touch with loved ones. They're a lifeline for people without internet access. The postal Universal Service Obligation (USO) should be a safety net for consumers, ensuring the service remains reliable and affordable, even in a monopoly market.

But our data shows that millions of people experienced letter delays in 2024, while the price of a first class stamp has more than doubled in 5 years. With Ofcom's review of the postal USO underway, we'll be considering how well the service is working and potential improvements to address consumers' concerns and priorities.

In 2025/26 we'll remain closely involved in Ofcom's review of the USO. We'll represent consumer interests to Ofcom and in wider stakeholder discussions - pushing to improve the reliability of the service, retain price caps, and ensure the service is truly universal by tackling post exclusion. We'll also commission tactical research on proposed changes to the USO where needed.

Exploring poor outcomes in the evolution of pricing

Pricing practices in essential markets have evolved significantly in recent years as a result of technological change and innovation. Algorithmic pricing, the use of AI in pricing models, dynamic pricing including surge pricing, all have the potential to impact significantly on the prices consumers end up paying for products and services - and we're concerned that many are getting poorer outcomes as a result. This is a particular concern where poorer outcomes may be more likely amongst groups of consumers facing structural inequalities, as we've previously highlighted with respect to algorithmic pricing and the ethnicity penalty in the insurance market.

In 2025/26 we'll consider how pricing practices are changing across regulated and unregulated markets, monitor our data to identify where consumers may be experiencing particularly poor or unfair outcomes as a result of these new pricing practices. We'll also carry out wider research where needed to understand the impact on particular groups or specific markets. We will raise any market-specific concerns with regulators and consider if any steps should be taken cross-market.



Using our data to tackle perennial consumer issues

Our Consumer Service data allows us to identify issues that consumers are regularly experiencing in key markets. Following on from our work highlighting serious issues in the disability aids markets, in 2025/26 we will continue to work with the Consumer Protection Partnership to develop solutions to other perennial issues in markets such as used cars and home improvements, where consumers are often paying out large sums of money and receiving poor goods or services in return.

As part of this work, we'll review the existing consumer protection toolkit and consider if there are general approaches to addressing certain issues in different markets which can be brought together under a common framework.



Ensuring that the non-domestic market is fit for the future

From December 2024, Citizens Advice became the Statutory Advocate for small businesses, in addition to the microbusiness energy consumers that we already represent. This change comes at a time when there is increasing focus on the non-domestic energy market, following Ofgem's Non-Domestic Market Review. We're concerned that the market isn't working as well as it could be for these smaller business consumers. In the past we've raised concerns about poor practice from third-party intermediaries (TPIs); transparency and competition; customer service and protections for customers in debt. Now that we're representing more non-domestic customers than ever before, we're keen to understand which issues are most important to businesses, and what changes will have the most impact. We will continue our research into how small and microbusiness consumers experience the energy sector, and will continue working with Government and others to ensure that the needs of small and micro-businesses are reflected in energy regulation and practice.

 **Ensuring consumers are protected during the net zero transition**

Net zero technologies can deliver huge benefits for consumers, but the current landscape leaves consumers at risk of harm if they experience issues with installations or encounter rogue traders. In 2025/26 we will build on our work on a new consumer protections framework, for example providing evidence on the changes needed to give consumers the confidence to install these new technologies.

 **Maximising net zero opportunities to deliver for consumers**

Changes to energy systems such as the review of electricity market arrangements (REMA) could deliver significant and long lasting reforms for a more efficient electricity system that lowers overall costs to consumers. We will continue to represent the interests of consumers to ensure that decisions achieve the right outcomes in practice and a just transition, and explore how the wholesale market, retail market, and government policy will need to interact.

Fixing affordability problems in essential markets

While the peak of the cost of living crisis has passed, the effects of the sharp inflation of the previous few years continue to be acutely felt by millions. 2024 saw unprecedented levels of demand for our advice services and it is clear that many households remain overwhelmed by the financial challenges that they face. We will work to identify - and deliver - positive changes in essential services markets that put money back into their pockets. Much of our work will be GB-wide, though our work on fuel poverty will concentrate on England and Wales, respecting that it is a devolved matter in Scotland and sits within Consumer Scotland's remit.

Ending the digital exclusion penalty in post

The shift towards digital has reduced the reliance on letters for many consumers. But post remains a lifeline for the 1 in 20 UK households that don't have internet access. The postal USO is meant to secure an affordable 'one price goes everywhere' service. Yet Royal Mail is now charging higher prices for products purchased in person than those online. We're concerned about the impact on digitally excluded consumers who rely most on post.

In 2025/26 we'll commission tactical research on the scale and impact of this digital exclusion penalty, to push Ofcom and Royal Mail to address the issue.



Exploring the intersection between financial exclusion and digital exclusion

Digital exclusion and financial exclusion can interact in ways that compound difficulties for consumers, particularly with regard to making essential bills affordable. For example, digital payments methods such as 'Request to Pay' can play a key role in giving those on restricted incomes greater control over their spending. But these kinds of innovative payment methods are not available to those who can't reliably access the internet on devices like computers or smartphones - so a consumer experiencing digital exclusion may also end up experiencing a significant form of financial exclusion as a result, which then impacts the outcomes they receive in other markets such as utilities.

In 2025/26, we'll work with our frontline advisers to better understand the interaction between financial and digital exclusion, and identify examples of good practice where essential sectors can learn from one another about how to prevent one form of exclusion exacerbating another.

 **Making low carbon homes more affordable**

Millions of homes need to be upgraded to meet the Government's net zero targets and many people are interested in making energy improvements to their homes but cost and affordability remain major barriers. In 2025/26 we will further explore attitudes to energy efficiency and low carbon heating among low-income households and private renters. We will particularly consider any additional barriers faced by older people on low incomes who may miss out on the Winter Fuel Payment following changes to eligibility.

We will continue to explore how energy efficiency and low carbon schemes can be improved to make them more accessible to those who need them most.

Many homeowners can't afford to pay anything towards a home energy upgrade and some can only pay part of the costs. Eligibility for fully-funded schemes across England and Wales is limited and can be difficult to navigate for consumers. In 2025/26 we will further explore what financial support is needed to facilitate accessible and affordable low carbon home retrofit, including the assessment of different financing options and what support schemes could look like.

 **Reforming energy affordability support**

Millions of households are still struggling with their energy, and many are burdened with unsustainable energy debts built up over recent years. Energy problems are now the most common types of issues we help people with, with 2023 the highest on record. The long-term impact of the crisis is showing, with energy debt now the most common type of debt people come to us for help with. In 2024 we made the case for targeted enduring support through a more tailored Warm Home Discount (WHD) in our 'Shock Proof' and 'Fixing the Foundations' reports. This would target support at those who need it most and enable bill support for consumers who are risk of losing out significantly during the transition to Net Zero.

In 2025/26 we will continue to make the case for this type of support and demonstrate the role it can play in safeguarding consumers, supporting net zero, and enabling reform of standing charges and policy levies. We will develop our understanding of the measures needed to ensure that targeted support can be introduced by 2025/26, the impact this could have on households in need, and how this would work with reformed targeted support in other essential services. We will also work with Ofgem as they develop their next steps on debt and affordability, to ensure that they deliver the most benefit for households in need.

We will also continue to monitor our clients' experiences of existing schemes such as the WHD, as well as Government energy efficiency schemes such as ECO4 and the upcoming Warm Homes: Local Grant.



Designing effective bill support schemes in essential markets

Despite inflation coming down from its peak, large numbers of the people who come to see us are struggling to manage the costs of their essential bills. Beyond the increase to the energy price cap in October 2024, consumers have faced significant increases in car insurance premiums over the past few years - while water bills are set to rise by an average of 21% over the next 5 years. Effective bill support schemes in essential markets are needed to keep low income households reliably connected to the services they need without needing to borrow or get into debt to pay their bills.

In 2025/26 we'll continue to make the case for an effective suite of bill support schemes across the water, broadband and motor insurance markets (in addition to reforming energy affordability support). We'll focus in particular on how better use of government data sharing could be used to automate or streamline these schemes and negate the need for consumers to make complex, time consuming applications. This project is informed by our research on targeted energy bill support, and we'll ensure cross-sector learnings are applied in our energy work.

We'll work with industry to develop recommendations that are practical, whilst also integrating insights from our frontline services to ensure that the consumer experience is put at the heart of the policy design process.



Reducing rates of self-disconnection

Our Shock Proof report revealed that more than three million people had disconnected their supply in the last year because they could not afford to top up their meter.

We will continue our work on reducing self-disconnection, looking at current rates by demographic characteristics, as well as exploring the impact of repeated disconnection and self-rationing - in terms of physical and mental health, debt accumulation, impacts on children, and housing conditions - to outline current gaps on the further support necessary to reduce rates even further.

Infrastructure that delivers value for consumers

Essential markets rely on investment in both new projects and in maintaining existing infrastructure, funded by either consumers or taxpayers. The requirement to reach net zero emissions provides an added challenge, requiring a transformation of the economy as a whole. Investment must be well managed to ensure value for money and good consumer outcomes. In markets dominated by a monopoly provider, regulators need to act to make sure consumers don't pay more than they need to for an essential service. We will consider the regional impacts of infrastructure investment, and any differential impacts between England, Wales and Scotland.



Responding to increased complexity in the energy systems landscape

GB's energy system is transforming rapidly, introducing new roles, complexities and the risk that changes do not reflect consumers' needs and interests. It will be important that we can respond to these developments to ensure the consumer voice is represented in these changes and decisions.

2025/6 will see new local energy institutions and governance arrangements, arising from the introduction of Regional Energy Strategic Plans (RESs). We will develop the capability and capacity to ensure consumer interests are effectively represented. We will work with the National Energy System Operator (NESO), as part of our new strategic partnership, and Ofgem to deliver this.

We will continue to build capacity for engaging with the codes that govern the energy industry. Ensuring consumer interests are central to these codes will become increasingly important as the pace of change increases and we are uniquely positioned to provide expert and independent challenge.

We will also continue to engage with key reform programmes such as the Review of Electricity Market Arrangements (REMA) and Marketwide Half-hourly Settlements (MHHS).

 **Ensuring changes to the post office network meet consumers' needs**

The post office network is one of the largest remaining providers of face-to-face services. Our findings show that nearly 9 in 10 (86%) GB adults used a branch in the last year, including over 1 in 6 (17%) at least once a week. However, the network is under wider pressure from the digitisation of services and changes to the high street. The government has recently announced a Green Paper on the future of the post office for 2025.

In 2025/26, we'll work with government and other stakeholders to respond to this review. We'll carry out research and mapping to understand what post office provision could look like, with a focus on ensuring changes take the needs of those most reliant on post offices into account. We'll also continue our formal role in reviewing any proposals by Post Office Limited to close or franchise Directly Managed branches.

 **Price controls**

In 2025 the development of gas network and electricity transmission price controls will overlap with those of electricity distribution. The regulatory decisions for RIIO-3 will be critical for taking the next steps towards net zero. We will continue to scrutinise their development to ensure consumers' voices are heard in the process and get value for money.

We will also work to ensure network company performance is monitored effectively and reported on transparently. This will look across all relevant energy networks including independent networks.

We will continue to assess the effectiveness of the economic regulation of network companies and explore the implications for public perception and financeability.

 **Continuing to advocate for better consumer outcomes in the parcels market**

Parcel deliveries are now an integral part of people's lives - however, we've consistently found that consumers are experiencing high rates of delivery problems. These issues disproportionately affect certain groups, such as disabled people and racially minoritised groups. Whilst we've seen some promising steps from Ofcom on accessibility and improving complaints processes, we've yet to see meaningful action on delivery problems more generally.

In 2025/26 we will continue to advocate for improvements to the consumer experience in the parcels sector. We'll monitor the performance of the top 5 parcel companies through our annual Parcels League Table, which gives an overview of trends in progress and ongoing problems. And we'll build on our previous work looking at the impact of delivery drivers' working conditions to identify areas where employment practices could be improved to deliver better outcomes for consumers in the parcels market.

Harnessing innovation to build fairness into service

Consumers in vulnerable circumstances are more likely to experience harm in essential service markets. Our previous research showed that these consumers are more likely to be paying a high loyalty penalty. They can find it harder to access essential services. And they're more likely to come to Citizens Advice for help. It doesn't have to be this way. Smart, sensitive design can deliver products and services that better meet people's needs.



Ensuring consumers in vulnerable circumstances are not excluded from fair value

Research for our 2023 report into mid-contract price rises highlighted that certain consumers in vulnerable circumstances (for example, those with mental health issues) may be disproportionately impacted by the practice of telco and insurance providers offering cheaper deals to existing customers who phone up and renegotiate their price. Accessing these 'hidden deals' may be more difficult for those who struggle with talking on the phone, retaining and comparing complex information when it's not written down, and other parts of the renegotiating process.

In 2025/26 we will work with third sector organisations who advocate on behalf of specific marginalised or vulnerable groups to build a fuller picture of how much of an impact the existence of 'hidden deals' and the difficulties people can have accessing them, is having on the ability of these consumers to get fair value for their telco and insurance services. We'll also engage with regulators to assess the potential impact hidden deals may be having on effective competition in these markets.



Flexibility and smart energy products and services

Flexible energy use by consumers is set to become a crucial feature of the GB energy system with Clean Power 2030 stating that a four to fivefold increase in demand flexibility is required over the next 6 years. However, this will require consumers to participate on a scale not yet seen and will involve greater use of smart technology.

We will examine how flexibility can be accessed equitably by consumers and how markets should develop to ensure good outcomes for consumers. Part of this will include protections and advice. In 2024, we welcomed the Government's plan to introduce a licensing regime for the flexibility market. Clear rules and better protections should improve people's confidence in the growing market for smart products and services and help more people to benefit from cheaper flexible energy usage.

An important aspect of these plans is the proposal to expand statutory advice and advocacy to the flexibility market, which currently only applies to the energy supply market. It's important that an expanded advice service responds to people's needs, so we have kicked off research to better understand what advice people need to navigate smart energy products and services. In 2025, we will use this insight to work with the Government to help shape the requirements of an expanded advice service.



Understanding the impact of digital design practices on consumers in vulnerable circumstances

In 2024/2025 we undertook [research](#) to understand why certain design practices are contributing to disproportionately poor outcomes for consumers in vulnerable circumstances - this resulted in a report exploring the relationships between online choice architecture and vulnerability. One of the key findings of this work was that wider research in this area is scarce - particularly with regard to the interaction between specific digital design practices and particular vulnerable circumstances of consumers.

In 2025/26 we will deliver new research filling one of the gaps in the existing evidence base, exploring the impact of reference pricing practices on people with mental health problems and/or experiencing financial insecurity. In addition to exploring the harms to individual consumers, we'll also examine the potential impact of these practices on effective competition between providers in different markets, and develop recommendations that ensure these groups do not pay high prices due to design tactics. On the basis of this research, we'll engage with regulators to understand the implications of the work for both enforcing existing consumer protections, and the potential need to create new policy in relation to reference pricing.

Improving the consumer experience of smart metering to ensure benefits are delivered

We will continue to input into decisions and work programmes affecting the smart meter rollout, including the smart Code of Practice for DESNZ, Ofgem's new Guaranteed Standards of Performance, and the post-2025 framework for the smart meter rollout. Our work on a consent data dashboard is now being developed by Ofgem, and this will be vital as more companies seek to access consumer smart data for their own purposes. These ongoing projects are significant opportunities to improve the customer experience of smart alongside its reputation among those who have not yet chosen to have a smart meter fitted.

Alongside our advocacy for new protections we will also monitor those that already exist to ensure they are being met, including the voluntary commitments around In-Home Displays. The forthcoming shut-off of 2G services (which will affect SMETS1 meters and smart meters in the Central and South regions) and the shut-off of radio-teleswitch meters will also impact hundreds of thousands of consumer homes in the coming year, and we will dedicate advocacy and policy resources to ensuring that consumers are aware of any potential impacts across these programmes.

There are ongoing issues around the accountability of the Data Communications Company (DCC). Current licence conditions exempt issues related to the DCC, and it has no consumer-facing role. We will consider how best we can examine the DCC's important role in smart metering through a lens of consumer accountability.

Enhancing consent to a multi-sector priority services register

In its previous two Vulnerability Strategies, Ofgem have suggested the development of a multi-sector PSR to level up the way that consumers provide information about themselves and how companies tailor their support to customers. However, more progress needs to be made.

The multi-sector PSR aims to reduce the burden on consumers to repeatedly self-identify as vulnerable. We will consider how the PSR can work better, and what consumers who are in vulnerable circumstances, who may face barriers, and need support want from a multi-sector PSR to inform its development.

Retail market innovation to improve consumer outcomes

The energy retail market is changing at pace. Market-wide Half-Hourly Settlement will be a key change that industry will be preparing for in 2025/26, alongside new innovation frameworks and future changes to reform price protection. We will further develop our work on the future of the retail market in response to these ongoing changes, and will consider developments which may affect consumer confidence in the retail market as well as how the market may need to innovate and adapt to protect vulnerable and disadvantaged consumers. As we consider the impact that these changes have on energy consumers, we will also further develop our positioning on the customer services aspects of these new developments, including through any changes to our consumer engagement research.

Our work contributing to Ofgem’s additional development of their customer service standards and our review of the Citizens Advice Star Rating will aim to future-proof our policy positions and understand consumer needs in advance of 2030. In 2024-25 we began a review of the Star Rating and launched a consultation for public and stakeholder input on the way that it operates. We will continue this work in 2025-26, aiming to begin data collection for the new Star Rating in Q1 of 2025-26. We will support our work on customer service and consumer needs through analysis of emerging developments such as the deployment of AI in customer service models.

Ending post exclusion for millions of people

Although post is intended to be a 'universal' service, this still isn't the case. In the decade leading up to 2020, 7 million people lost access to post at some point - either because they didn't have a fixed address or because someone was intercepting it. This means they are more likely to struggle to access essential support and services, often at the point they most need them.

Since 2018, we've worked with industry, regulators, charities and people with lived experience to develop a solution. An 'Address & Collect' service would allow people who don't have access to post to collect their letters at a post office.

In the coming year, we'll commission new research to look at the practicalities and potential benefits of a service like 'Address & Collect'. This will help our work with Ofcom, Royal Mail and the Post Office on establishing a service pilot, which we hope can expand in future.

Providing clients with tailored energy advice

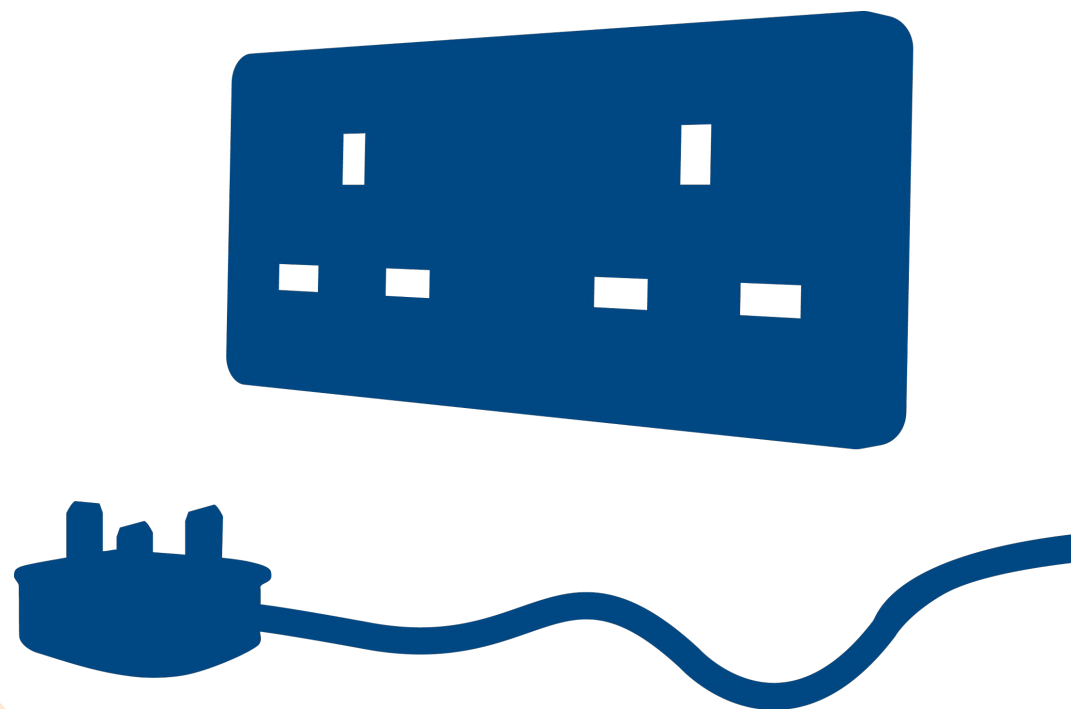
Our data indicates the cost of living crisis is far from over. Whilst there has been a slight improvement in the number of people who are seeking energy advice, numbers are still far higher than pre-pandemic levels and pre-cost of living levels.

The reality is that the problem is becoming more entrenched and we're facing the downstream effects of a cost of living crisis. It's surfacing as greater energy debt and this is spiralling into other parts of people's lives, whether that's problems with debts in other markets, reliance on food banks or housing crises.

Our advisors tell us that the problems they see on the ground are getting more complicated to fix. They also see more personal vulnerabilities emerging, such as increasing mental health problems.

As a charity, we know more detailed advice will be needed to pull people out of their problems. Over the next year, we'll pilot more intensive approaches to help people. A particular focus will need to be how we move people from deeper energy crises, like debt and disconnection, to longer term solutions like energy efficiency grants.

Our strong local presence enables us to focus our efforts in outreach settings and partnerships, trying to close the gap for marginalised communities that wouldn't ordinarily seek advice. We'll refine our models to help us do this, looking for continuous improvement.



Providing clients with tailored energy advice

Energy savers campaign

Our energy savers campaign is a year long campaign, reaching a cross section of people who are likely to need advice about energy.

This year we got almost 750,000 impressions on Acast advertising across April and May and our influencer outreach gained over 1.3 million impressions. Both specifically targeted younger people.

We also reached into communities by placing 26,000 leaflets in over 2000 GP surgeries across the country.

Energy Advice Programme client:

Victor * is a very proud older person who found it uncomfortable to ask for help. He has poor mobility and several significant health issues that affect his day to day life. He was living on a low income of state pension and Pension Credit and was at risk of fuel poverty. He was struggling to afford to eat and was concerned that he wouldn't be able to keep himself warm in the winter. He has no support from friends or family and when he attended the local Citizens Advice office he said he felt lonely and isolated.

Advice and assistance provided:

The energy adviser identified that Victor was eligible to claim Attendance Allowance and other benefits. They were able to refer him to the office's benefit team who successfully applied for the benefit on behalf of Victor. The award enabled a severe disability premium to be added to his Pension Credit which resulted in a significant increase in his income.

Victor was provided with energy efficiency advice enabling him to reduce his energy usage. He was placed on a social water tariff significantly reducing his water bill. As part of a holistic service the adviser referred Victor to local groups that would provide him with social interaction and assist in reducing his feelings of isolation.

The advice Victor received resulted in a total income gain of over £10,000 per annum as well as a significant improvement in their health and wellbeing.

What Victor had to say...

'My life is really changing for the better, largely due to Citizens Advice. Now I can afford to buy nicer, more healthy food. I can afford to hire a cleaner and to see a chiroprapist. I am now attending a group two mornings a week, where we have a cup of tea and chat about anything. Thank you for helping me'.

*Name has been changed to protect anonymity

Improving access to debt advice

Total energy debt and arrears now stand at £3.8bn, with this figure increasing by 31% in the year to September 2024. Nationally representative polling for Citizens Advice in July 2024 found that 7% of respondents, equal to 5 million people across Great Britain, lived in households in energy debt.

A growing number of households are struggling to set up sustainable repayment arrangements. According to Ofgem, fewer than 1.5 million gas and electricity accounts in debt had a repayment plan in place at the start of 2024, compared to over 1.9 million with no arrangement to repay. The scale of additional unrecoverable energy debt is so large that it's increasing bills for all consumers and has cost households on the price cap £28 per annum from April 2024.

High debt levels risk reducing consumer engagement at a time this needs to rise to support better consumer outcomes as we transition to net zero. They can also degrade supplier resilience just as we need more investment to support the development and launch of innovative products and services.

Current debt advice does not have the necessary capacity to address this problem. There is a requirement for energy suppliers to signpost to independent debt advice but this is driving their customers to overwhelmed services, which can leave customers stranded and their energy debt unresolved.

To tackle this problem we have been working with government and industry to develop **a new telephone-based debt advice service for England and Wales**. This builds on the existing statutory energy advice framework with FCA-regulated advice from 3 leading independent debt charities - Citizens Advice, Money Advice Trust and Stepchange.

The extensive experience of these organisations in supporting households and businesses with different debt solutions will enable us to tackle immediate energy debt and break the continuous cycle of debt some consumers experience. Similar improvements to debt advice are being developed for consumers in Scotland.

The service will specifically target households and small businesses with energy debt, consider their whole budget, maximise their income, and deliver the right debt solutions for their needs, at the right time. By doing this, we will place households and businesses in a better position to avoid continuous debt cycles and ensure they can continue to pay for their ongoing energy consumption.

It combines the specialisms of the 3 organisations to optimise service outcomes and deliver a better experience for energy consumers in debt. The service will enable greater energy market stability through supporting the reduction of bad debt and improving consumer resilience.

Improving access to debt advice

The service builds on the Citizens Advice Consumer Service helpline, which is signposted on all energy bills and supplier websites. It will be available to households and businesses who are identified as having energy debt following triage by the Consumer Service, and the service will complement the existing Extra Help Unit (EHU) for people in vulnerable circumstances.

Within the first year of mobilisation, we also plan to provide a direct referral pathway for energy suppliers to refer their consumers with energy debt into the new service. We're exploring how the service can support the aims of Ofgem's [proposed debt relief scheme](#), which would start in the second half of 2025.

It will enable re-engagement of consumers who may not have repayment plans in place, and provide a conducive environment to explore their debt and put in place sustainable solutions, including access to debt relief.

We'll work closely with Ofgem as it develops its plans, and consider how the service can enable optimal outcomes for consumers who are eligible for relief, as well as providing support for those who miss out.

The service will also aim to help consumers with onward access to schemes for energy efficiency or low carbon heating, exploring how much more impact these interventions can have once a consumer's more pressing financial situation is resolved.

The service will reduce the cost of bad debt in energy bills by engaging people who can repay some of their debt and removing the administrative burden of chasing people who will not otherwise engage. This will return an annual £2.53 saving for each GB household when fully mobilised.

Financial instability impacts all areas of life, worsening health issues, threatening employment, and leading to homelessness. We'll deliver value by reducing the demand for public services - by the third year the service will return £5.61 per GB household to the public purse.

As importantly, we will reduce the human cost involved in problem debt and its effects - delivering value direct to clients who will be free to live a healthy and productive life. This is valued at £4,300 in public value per client.

Subject to further agreement, the service will ramp up delivery over time, with the ability to support 150,000 people with energy debts each year by the third year of operation. We have included proposed expenditure for the first year, though this is dependent on when agreement is reached and mobilisation of the new service starts.

We've engaged with key industry stakeholders as we have developed this proposal and received broad support, but welcome further feedback in response to this work plan.

Representing energy consumers in the policy development process

Energy policy is developed in a range of different arenas and it is essential that the consumer voice is represented. To give a sense of the breadth and depth of where we represent consumers' interests, here are some of the working groups, taskforces and panels we expect to participate in the year ahead. This is not an exhaustive list, and we expect it to evolve over the year in line with policy developments.

Fuel poverty

Welsh Government: Fuel Poverty Advisory Panel
NEA Cymru: Fuel Poverty Coalition Cymru
Fuel Poverty Senedd Cross-party Group
Fuel Poverty Strategy Working Group

Smart homes

Smart and Secure Electricity System (SSES) Industry Advisory Group
SSES Energy Smart Appliances (ESA) technical working group
HOMEFlex Code stakeholder group
Smart and Fair? Advisory Board
British Standards Institute (BSI) Publicly Available Specification (PAS) 1878/79: Energy Smart Appliances review panel

Retail market standards

Energy UK Expert panel and stakeholder panel for Vulnerability Commitment
Energy UK Compliance Panel for Switch Guarantee
Ofgem Small to Medium User Group
Retail Tripartite meeting
DESNZ working group: Consumer Protection
DESNZ working group: Supporting growth in Innovation

Codes

Balancing and Settlement Code (BSC) panel
Uniform Network Code (UNC) panel
Connection and Use of System Code (CUSC) Panel
Smart Energy Code (SEC) Panel, SEC Change Board and SEC Change Sub-Committee
Retail Energy Code (REC) Change Panel, REC Performance Assurance Board, and REC Change Issues Group
Performance Assurance and Change Panel Boards

We will continue to engage with Energy Code Governance Reform to ensure consumer interests are central to the future operation of codes and Code Managers, building on our membership of Ofgem's Modification Process Workgroup in 2024.

Net Zero

Future Homes Standard Implementation Board
(and co-chair of Consumer Implementation Group)
Renewable Energy Consumer Code Supervisory Panel
DESNZ electrification of heat group
Sustainable Homes & Buildings Coalition Working Group
MCS Consumer Protection Panel

Smart metering

Smart Metering Delivery Group (SMDG)
Smart Metering Operations Group (SMOG)
Consumer Reference Group (CRG)
Smart Meter Installation Schedule (Subset of REC)
Observer on Smart Energy GB Board
Smart Energy Code Privacy Sub-Committee
Radio Teleswitch service (RTS) consumer engagement group

Heat networks

DESNZ Heat Networks Stakeholder Group
Heat Trust Committee

National Energy System Operator (NESO)

As part of our Strategic Partnership with NESO we anticipate that we will represent consumers on a number of different forums and councils covering the energy system and building on our membership in 2024 of NESO's Clean Power 2030 Societal Delivery forum.

Energy networks

REMA Strategic Advisory Group
REMA End-user Challenge Panel
National Energy System Operator (NESO) RIIO Stakeholder Group
National Energy System Operator (NESO) Performance Panel
Connections Reform Steering Group
Ofgem Connections Delivery Board
Marketwide Half Hourly Settlement Programme Steering Group
Capacity Market Advisory Group
Electricity & Gas Resilience Interactions Task Group (EGRIT)

RIIO-GD2: Vulnerability and Carbon Monoxide Allowance Steering Group

RIIO-3: Cross-sector policy group
GD3 - Gas Distribution Working Group
GT3 - Gas Transmission Working Group
ET3 - Electricity Transmission Working Group
RIIO-3 consumer group
ED3 working groups

Provisional expenditure 2025-26

We are requesting an ongoing increase of £1,610,473 in 2025/26. This increase mostly relates to energy, with other areas broadly flat in real terms.

The biggest part of this increase is to maintain energy activity at current levels, reflecting inflationary pressures and the full-year impacts of new roles phased in during 2024/25. It includes a small increase in programme cost to reflect the higher cost of research as part of our new heat networks function.

The majority of the remaining increase will enable us to expand our energy staffing to meet new demands for our specialist input and expertise that have emerged in the last year. This includes developing and implementing a regional advocacy model.

A small proportion of the overall increase will enable us to continue investing in improving the quality and scope of our digital energy advice, which is already reaching over 3.75 million users a year.

The total energy funding is equivalent to approximately 14p per GB household.

The specific allocations in this work plan are necessarily provisional, and subject to change if we have to adapt our work in response to external developments during the year.

	Staff and related costs	Programme	Total
Energy	£ 6,626,163	£ 592,900	£7,219,063
Post	£ 999,537	£ 132,000	£1,131,537
Cross-sector	£ 824,073	£151,800	£975,873
Directorate	£207,000	£0	£207,000
Total			£9,533,473

This budget reflects funding allocated by the Department for Business and Trade (DBT) to advocate for consumers in England and Wales.

We will also receive a further £272,930 in funding from Consumer Scotland to ensure we are able to reflect the interests of Scottish consumers in GB-wide decision-making. This would take our total 2024/25 advocacy budget to £9,806,403

Provisional expenditure 2025-26

Our proposed debt advice service, delivered with Money Advice Trust and Stepchange, will significantly improve support for people who have fallen behind on their energy bills, and help them find sustainable solutions.

When fully mobilised we estimate the service will return an annual £2.53 saving for each GB household, with wider benefits to taxpayers and those supported by the service.

We're also pleased to oversee the Energy Outreach Programme (formerly known as the Big Energy Saving Network) and Energy Savers Campaign.

We are requesting an increase of £100k from last year to reflect inflationary impacts. This is the first increase in 3 years (since 2022/23).

Consumer Energy Debt Advice Budget 2025/26

	Programme	Total
Consumer Energy Debt Advice	£ 10,996,456	£ 10,996,456

The total funding is equivalent to approximately 21p per GB household.² This cost is based on mobilising the service from April 2025. Service capacity and costs in 25/26 may be lower depending on when agreement for the service is reached.

Energy Outreach Programme Budget 2025/26

	Programme	Total
Energy advice programmes	£ 2,970,338	£ 2,970,338

The total funding is equivalent to approximately 6p per GB household.²

² Energy cost per household based on the approximate contribution made by household energy consumers only (by volume). Non domestic consumers also contribute towards the levy.

Citizens Advice helps people find a way forward.

We provide free, confidential and independent advice to help people overcome their problems. We're 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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