

# Consultation Response

## Domestic energy retail consultation: opt-in and testing opt-out switching.

Department for Business, Energy and Industrial Strategy (BEIS)

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## About this consultation

This consultation puts forward proposals for an opt-in energy tariff switching mechanism and testing an opt-out tariff switching alternative. Opt-in tariff prompts will be provided to a selection of disengaged consumers to facilitate greater tariff switching and market competition. A framework for testing opt-out switching is proposed as part of broader reforms to default tariff arrangements. Along with wider energy market reforms, these schemes are designed to address the energy market loyalty penalty.

## Key points and recommendations

- The Department for Business, Energy, and Industrial Strategy (BEIS) must commit to a concerted digital inclusion campaign to ensure opt-in and opt-out switching mechanisms do not prevent digitally excluded consumers from engaging.
- This must include digital skills funding, accessible guides and a wider drive to increase broadband access and financial support for older digitally excluded households.
- BEIS should also guarantee that opt-in and opt-out switching mechanisms and prompts are provided via online, telephone and postal formats.
- Prepayment meter (PPM) customers must be supported, including facilitating debt carry-over increases, meter top-up guarantees during switching and Smart meter upgrades.
- Age UK supports a Collective Switch approach to consumer opt-in prompts but welcomes BEIS's commitment to flexibility and future consultation on this aspect of the proposals.
- Given BEIS's proposals for an incremental test and learn approach to opt-in switching we strongly recommend that low-income and fuel poor households are prioritised in the rollout.
- BEIS must ensure that any support received through schemes like the Warm Home Discount (WHD) or Energy Company Obligation (ECO) would continue after a switch.
- The Government must act as a backstop for any missed supplier obligations (such as WHD or ECO) that occurred as result of a switch.
- We recommend BEIS investigate options for securely transferring a household's Priority Service Register (PSR) status to a new supplier after opt-in or opt-out switching.
- We strongly reinforce the need to ensure customer repayment plans and any other debt support measures are transferred to the new supplier during any opt-in or opt-out switch.
- BEIS must ensure that older consumers who have been selected for opt-in switching are prompted to switch again when the opt-in tariff comes to an end.
- We recommend investigating the differential impact of opt-out switching on older consumers within the testing framework.

## **About Age UK**

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances. In the UK, the Charity helps more than seven million older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people. Its work focuses on ensuring that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe, and secure at home; and feel valued and able to participate.

## Introduction

We welcome the opportunity to respond to this consultation. Age UK strongly supports the Department for Business, Energy, and Industrial Strategy's (BEIS) efforts to address the loyalty penalty. Our response to these proposals reflects our concern that aspects of implementing opt-in or opt-out switching may limit access and engagement for older consumers. Proposals for incorporating opt-in switching, and testing opt-out, present a promising opportunity to reduce the loyalty penalty. Older consumers stand to gain significantly as they have higher energy costs<sup>1</sup>, spend longer at home, and are more likely to live with health conditions which require more heating or energy use<sup>2</sup>. But the benefits of opt-in and opt-out switching can only be achieved if older people are able to meaningfully engage with the new mechanisms.

This consultation proposes an opt-in energy tariff switching mechanism and a framework for testing opt-out switching. Along with wider energy market reforms, these schemes are designed to address the energy market loyalty penalty<sup>3</sup>.

For older people the loyalty penalty is compounded by wider issues they face in the energy market. While the proportion of older people in fuel poverty is lower than for younger households, they often face a deeper level of fuel poverty. Retired households have the highest median fuel costs and the highest fuel poverty gap compared to households of other employment statuses<sup>4</sup>. This means the amount of money which needs to come off energy bills to lift people out of fuel poverty is highest for retired consumers.

We broadly welcome the reforms proposed by the Government to address the loyalty penalty, which include an opt-in tariff switching mechanism and plans to test an opt-out alternative as part of broader reforms to default tariff arrangements. We agree this is a critical component of facilitating market competition and eventually removing the energy price cap. The proposals sit alongside proposed reforms to Warm Home Discount (WHD) and Energy Company Obligation (ECO) supplier thresholds, which Age UK responded to earlier this year<sup>56</sup>.

Proposals for the opt-in mechanism follow extensive testing by Ofgem, including the most recent Collective Switching trials which concluded in 2019<sup>7</sup>. Trials demonstrated increased switching amongst disengaged consumers. 19-30% of customers on longer term default tariffs switched when provided with prompts, which compared to just 3-5% who were not prompted. These findings are encouraging.

We welcome BEIS's proposals for the opt-in mechanism but encourage greater monitoring of implementation to fine-tune the approach. The present proposal is to assign a policy lead who will define a particular group of disengaged consumers for support through the opt-in scheme. A Delivery Body will then support these customers switching to a new supplier by providing opt-in prompts. These prompts require consumers to actively opt into the switching process.

Opt-out switching is only at the testing phase, although we believe it has significant potential to help those most in need. BEIS's proposals are broadly similar to the opt-in mechanism but rather than disengaged consumers being asked to actively participate in a

tariff switch they are told that unless they expressly say that they do not want to switch tariff then they will be switched automatically.

## **Supporting older consumers**

Our response explains how the needs of many older consumers can be better represented in these proposals. BEIS need to appropriately consider issues such as digital exclusion, loss of support due to switching, transferring Priority Service Register (PSR) status, better support for consumers in debt and supporting those on pre-payment meters (PPM). Without addressing them, the benefits of opt-in and opt-out switching will not be felt by consumers that have the most to gain.

The Government needs to work with industry to support digitally included older people to engage with their energy supply online. However, there must be acknowledgement that the proposals must include offline access and communications such as by phone and post. Two fifths (42%) of those aged 75+ do not use the internet at all<sup>8</sup> and therefore have real difficulty in engaging with switching processes. More than half (53%) of those who do not use the internet have never switched energy suppliers, compared to a quarter (27%) of regular internet users<sup>9</sup>.

Our response also reflects our concern that opt-in and opt-out switching may result in some of the most vulnerable older consumers losing access to their PSR status or supplier delivered financial support, such as the Warm Home Discount Scheme (WHD) or Energy Company Obligation (ECO). BEIS must address these concerns so that low-income, fuel poor and vulnerable consumers can engage with opt-in and opt-out switching confident in the knowledge that they will not lose out on vital support.

We also strongly reinforce the need to ensure customer repayment plans and any other debt support measures are transferred to the new supplier during a switch. PPM debt must also be addressed to facilitate a more inclusive switching mechanism. Presently, customers with over £500 of gas or electricity debt are unable to switch supplier<sup>10</sup>. This condition is not conducive to a fair opt-in switching mechanism and risks locking indebted customers into expensive tariffs – further compounding the high costs of their monthly energy bills. BEIS and Ofgem must revise this debt transfer limit and the Debt Assignment Protocol<sup>11</sup> to allow PPM customers with higher debt levels to transfer to a new supplier with an appropriate repayment plan in place.

Wider barriers for PPM customers must also be tackled, including where possible, switching people to smart prepay – bringing further benefits such as a broader range of tariff options and improved household budgeting<sup>12</sup>. A supplier switch must also not temporarily prevent a customer from topping-up their meter.

On a wider level, consumer debt must be addressed as part of facilitating opt-in tariff switching. With more than 4 million people already behind on their household bills<sup>13</sup> support for indebted customers has never been more important. Without addressing this debt crisis opt-in switching will have limited impact for the consumers who could benefit most.

While we are hopeful that opt-in and opt-out switching could reduce the loyalty penalty, it is important that the Government also focuses on increasing support measures, such as the WHD and ECO, to provide wider protections for low-income and fuel poor consumers. A core commitment of the Government's Energy Retail Strategy was to ensure that adequate consumer protections are in place to support people who are unable to meaningfully engage with the energy market, and to help them bear the costs of the transition to net-zero<sup>14</sup>.

Recent supplier failures during the Energy Price Crisis have shown that switching tariff or supplier under certain market conditions will not always reduce a consumer's bill. BEIS must be mindful of what wider support is required beyond the proposed switching mechanisms to address rising energy prices. This must include improved support through schemes like the WHD, ECO and Home Upgrade Grant. As the Government overviews third party intermediary regulation<sup>15</sup> they must put in place procedures to ensure price comparison sites display each supplier's consumer support credentials – including the level of WHD and ECO spending they provide to customers. Furthermore, as part of opt-in and opt-out switching BEIS must provide additional resources to support the rollout of smart-meters, while being mindful that inadequate advice at installation can leave many older consumers feeling frustrated and unable to engage with their meter<sup>16</sup>. Tailored advice<sup>17</sup> and accessible in-home displays<sup>18</sup> are essential in addressing this.

The current energy crisis and the requirements of the net-zero transition demonstrate the need for a radical rethink of how to better provide help for consumers to reduce their energy bills and access support. Longer term, we need to see greater investment in energy efficiency programmes, because this will help lower bills, reduce anxiety for those in cold homes and protect people against any future surges in fuel costs.

**Question 1: Are there any other measures you think the Government should consider to help address the factors that have caused a loyalty penalty?**

The development of opt-in switching must consider how best to support a group that often finds it hardest to switch – those who are not online. Around two in five (42%) of those aged 75+ do not use the internet<sup>19</sup> and more than half (53%) of those who are not online have never engaged in tariff or supplier switching<sup>20</sup>. Digital exclusion will not just mean that older people and other groups cannot access the best deal, but they may also miss out on other financial and practical support such as the WHD, ECO or the upcoming Home Upgrade Grant Scheme. Older people are harder hit by the loyalty penalty<sup>21</sup> and often have higher heating costs and a greater fuel poverty gap than other age groups<sup>22</sup>. Older age should not automatically be equated with vulnerability but people in later life are more likely to be exposed to the circumstances (poor health, communication difficulties, reduced capability) which can make someone more vulnerable to poor consumer outcomes such as the loyalty penalty.

While it is positive to see BEIS recognise the role digital exclusion plays in the loyalty penalty it is crucial that they also recognise the need for a solution. The Government must acknowledge that strategies for addressing the loyalty penalty require a more

comprehensive solution to digital exclusion. This is particularly true given that proposals for opt-in switching involve prompts being sent to consumers and require active consumer engagement.

While opt-in switching may improve market engagement, digital exclusion will continue to leave many older people unable to meaningfully engage with account management, payment, redress, and future tariff switching. To address the loyalty penalty, BEIS must consider how best to support those who are offline. Access to any future switching services must be provided via online and offline routes. This should involve the opt-in mechanism being provided online, over the telephone and via a postal service. BEIS must also require that any opt-in or opt-out scheme is promoted through a broad range of sources, particularly print media, mail drops, and through community and voluntary organisations. Trials of opt-out switching should ensure that no one is left unable to opt-out of a tariff switch due to the mechanism only being provided online.

BEIS must also address a lack of access more broadly to the internet and digital services for older consumers. Digital exclusion can be caused by multiple factors. Excluded consumers may not have enough money to secure an internet connection or may only be able to pay for it intermittently. Some have access to the internet but feel unable to engage with devices, such as smart phones or web browsers, because of a lack of user confidence. Dexterity problems and disability issues can also prevent someone using certain devices or interfaces. Broadband access can also vary with rural areas sometimes lacking connectivity while some people feel able to access the internet for only a narrow range of activities.

Through our work in communities across the country delivering digital inclusion programmes, we know the importance of dedicated person-centred support to help get people online. A range of print and online resources are needed as well as ensuring that getting online is as affordable as possible.

### **Question 2: Do you agree with the proposed scope of tariff targeting?**

We agree that default tariff customers who have not engaged with tariff switching for a prolonged period would be the primary beneficiaries of an accessible opt-in switching mechanism. As outlined in our response to question six, we recommend that BEIS better account for the tariff switching barriers faced by PPM customers.

### **Question 3: Which consumers do you think are more likely to be disengaged with the retail market, for instance due to their circumstances or duration on a default tariff?**

As stated in our response to question one, we are most concerned about market disengagement amongst older consumers who are digitally excluded, particularly given

lower levels of internet access amongst older consumers (especially those aged 75+)<sup>23</sup> and the increased risk of the impact of fuel poverty on their health and wellbeing.

BEIS should target any opt-in switching mechanism towards those who have the most to gain – those on the lowest-incomes, on PPMs (see Q6), and in the deepest fuel poverty. This could include those who are in receipt of the WHD or its Industry Initiatives but must also look at ways to target the hardest to reach fuel poor households who do not qualify or do not receive the WHD. As stated in our response to question seven, it is crucial that no fuel poor or low-income consumer is switched onto a supplier that does not provide support schemes, such as the WHD or ECO, without support payment guarantees in place.

**Question 4: Do you think that an opt-in switching scheme should focus on, or prioritise, targeting consumers who have been on a default tariff for longer durations? Please specify if you think any particular duration is appropriate.**

While it is crucial that priority is given to those who have been disengaged from the energy market for the longest periods, flexibility of provision is also important. To ensure flexibility we recommend BEIS reduce the minimum disengaged consumer window from three years to two years. This will allow a greater number of consumers to be enrolled in the opt-in process at an earlier stage. Many fixed-term tariffs expire after two years with most customers then moved to (typically) expensive standard variable tariffs. Shortening the window to two years could prompt these consumers to engage with opt-in tariff switching when their two-year fixed-term deal expires.

**Question 5: Do you agree that an opt-in switching scheme should not target consumers based on the price they pay for their existing default tariff?**

We agree that the primary focus of targeting opt-in switching should be based on duration of a consumer's market disengagement. In cases where consumers have been paying excessive amounts to their energy supplier and built-up significant debt, BEIS should allow a degree of flexibility in targeting them with opt-in tariff switching. Allowing targeting of those who have larger bills and debt helps ensure fairness for older consumers as they often have higher energy costs<sup>24</sup>.

**Question 6: Do you agree that an opt-in switching scheme could be effective at creating new competition and market engagement in the PPM tariff market? Are there any PPM market considerations we should take into consideration?**

We recommend that BEIS better account for PPM customers in these proposals. PPM customers are frequently the most vulnerable consumers in the energy market. Research by the Competitions and Markets Authority (CMA) found that they face additional barriers to switching supplier<sup>25</sup>. They often face higher costs for switching or believe that the costs



would be unaffordable or impractical in their present circumstance<sup>26</sup>. These issues are compounded by higher levels of digital exclusion, a lack of clear guidance and reduced confidence when switching.

BEIS should commit to investigating ways of better including PPM tariffs in the opt-in switching mechanism and should test PPM switching in opt-out switching trials. This will require BEIS and Ofgem to also ensure that protections are in place to address any practical limitations with switching supplier when consumers are on a PPM. These limitations include restrictive limits on how much debt a consumer can carry over to a new supplier, the risk that a supplier switch may temporarily inhibit a consumer from topping-up their meter and issues with certain outdated electricity and gas meters requiring costly changes or upgrades to facilitate supplier switching.

Where possible additional support should be given to facilitate PPM customers being provided with a smart prepay meter. This will improve the tariff options available for any opt-in switch and bring broader benefits such as improved household budgeting and the ability to change payment type<sup>27</sup>. A supplier switch must also not temporarily prevent a customer from topping-up their meter. It is important that the opt-in switching mechanism ensures customers can always top-up their PPM even as they are transitioning to a new supplier.

PPM debt must also be addressed to facilitate a more inclusive switching mechanism. Under present Ofgem licence conditions PPM customers with over £500 of gas or electricity debt are unable to switch supplier<sup>28</sup>. This condition is not conducive to a fair opt-in switching mechanism which addresses the loyalty penalty. It risks locking the most vulnerable consumers in with existing suppliers at a time when Ofgem is considering removing the energy price cap. Instead, BEIS and Ofgem must commit to revising this licence condition and the Debt Assignment Protocol so that customers with higher debt levels can transfer their debt to a new supplier with an appropriate repayment plan in place. We reinforce the need to ensure customer repayment plans and any other debt support are transferred to the new supplier during a switch.

On a wider level, consumer debt must be addressed as a critical part of addressing the loyalty penalty and facilitating opt-in PPM tariff switching. In our response to the recent WHD consultation, Age UK rejected proposals to reduce the allocated spend for the debt write-off Industry Initiative, recommending the Government maintain the spending level and provide further support in the form of payment matching and debt write-off schemes<sup>29</sup>. With more than 4 million people already behind on their household bills<sup>30</sup> support for indebted customers has never been more important. Without addressing this debt crisis opt-in switching will have limited impact for the PPM consumers who could benefit most.

**Question 7: How do you think we should approach batch sizes and frequency? Do you agree with our proposed incremental, test and learn, approach to introduction?**

If BEIS follow through with an incremental test and learn approach we would strongly recommend that low-income and fuel poor households are given priority in the rollout. This could include those who are in receipt of the WHD or its Industry Initiatives but must also look at ways to target the hardest to reach fuel poor households who lack access to the WHD. It is important that BEIS and Ofgem do not remove the energy price cap without putting in place mechanisms to address the loyalty penalty, including an effective and widescale opt-in tariff switching mechanism to support disengaged customers.

Within the opt-in switching mechanism it is also crucial that no fuel poor or low-income consumer is switched onto a supplier that does not provide support schemes, such as the WHD or ECO, without the Government guaranteeing to cover the cost of any missed support payments. While supplier thresholds are being revised across the WHD and ECO, the smallest suppliers will still avoid any obligations and there is a risk that consumers switch to a new supplier who has already allocated their spend to existing customers. In cases where this occurs it is crucial that BEIS step in and guarantee to cover any missed WHD and ECO obligations where a supplier has been unable to support a low-income or fuel poor consumer.

**Question 8: Do you think that each batch of the opt-in switching scheme should target all energy suppliers or should batches focus on subsets of suppliers?**

BEIS has proposed initially rolling out the opt-in switching mechanism to smaller batches of consumers, with the possibility of targeting provision towards particular suppliers. We believe that access to opt-in switching should be provided for as many low-income and fuel poor consumers as practical, regardless of what supplier they are with.

We recognise that this may present issues for consumers attempting to access financial support schemes. As stated in our response to question seven, it is crucial that no fuel poor or low-income consumer is switched onto a supplier that does not provide support schemes, such as the WHD or ECO, without the Government putting in place support payment guarantees.

**Question 9: If batches focus on subsets of suppliers, on what basis should suppliers be prioritised for targeting?**

If supplier targeting is used, then the focus must be on supporting low-income and fuel poor consumers first. BEIS's proposal to target suppliers with higher proportions of disengaged consumers is a sensible starting point. We would recommend that BEIS also targets suppliers with higher proportions of fuel poor or low-income households and those PSRs with a diverse range of needs and circumstances.

**Question 10: Do you agree that the framework should allow for flexibility so that the policy lead (the Government and/or Ofgem) will be able to choose what type of**

**prompt is used? Do you have any comments on the prompt options described, or any other methods?**

BEIS has proposed two customer prompts for the opt-in switching mechanism. The first is a Collective Switch approach and the second is an Open Market approach. A prompt based on Collective Switch will provide consumers with one tariff option to switch to, provided by a single supplier via a competitive tendering process. Open Market prompts provide additional tariff options from multiple suppliers and allow consumers to choose who they switch to. While we welcome flexibility in the rollout of the opt-in switching mechanism, based on the available evidence we support a Collective Switch approach to consumer prompts.

Ofgem trials have shown a greater switching rate and energy bill saving from Collective Switch than an Open Market approach<sup>31</sup>. Collective Switch could also further ensure that support measures are embedded into the switching mechanism. For example, only suppliers who provide sufficient WHD and ECO spending commitments could be permitted to bid for the collective tariff. A Collective Switch approach also provides greater simplicity for consumers. This is particularly important given that many of the consumers targeted for the opt-in switching mechanism will be disengaged from the market because they have concerns regarding complicated price comparison websites and tariff switching processes. If BEIS ensures that the tariff switching process can be conducted both online and offline then a single collective tariff option will simplify the process, particularly for those who are digitally excluded. Depending on what type of prompt is used, an Open Market approach is also more likely to require digital skills and internet access for consumers to explore different options.

We however recognise that there are disadvantages to the Collective Switch approach. Given recent supplier failures brought about by increases in wholesale gas prices, a collective tariff provided by one supplier runs the risk of the supplier who successfully bids for the tariff taking on greater market risk. If this supplier fails it could leave some of the most disengaged energy customers reliant on other suppliers stepping in to take over their tariff. Recently, the Supplier of Last Resort (SoLR) has increasingly been unable to honour their new customer's previous tariff arrangements when they take over a failed supplier. While this could present a risk for consumers, on balance a Collective Switch approach is more likely to improve market access for disengaged consumers and reduce bills.

Nonetheless, we support BEIS's commitment to flexibility in the opt-in mechanism rollout to ensure that provision is adaptable to future market and consumer needs. We would welcome the opportunity to respond to any consultation BEIS proposes on the final composition of any consumer prompts and strongly reinforce the need for any prompts to be accessible via both online and offline means.

More broadly, opt-in and opt-out switching pose the risk of increasing customer confusion and anxiety. It is essential these processes do not leave any consumers feeling uninformed of the process or unable to engage with an opt-in prompt or opt-out mechanism. The Government must put consumer access at the centre of both the opt-in scheme and opt-out testing. BEIS must also consider additional consumer communication

requirements, for example where there is a language barrier or a consumer has a relevant disability or long-term health condition (e.g. a visual impairment).

**Question 11: Do you think a Government Company/ public model or a commercial model should be used for the Delivery Body(ies)? If a commercial body is used, do you think that a fee or commission based approach would be better? Are there any other models you think we should consider?**

**Question 12: If a commercial based framework (either through commission or a fee) is selected, a) to what extent do you think there will be competition risks? b) to what extent do you think the competition risks should and could be mitigated? C) what are your thoughts on the listed options of mitigation? d) how else might competition risks be mitigated?**

We are concerned that a commercial-based or commission-based model may result in passing greater costs onto the consumers who are the intended beneficiaries of the scheme. The appointment of Ofgem, BEIS or an appropriate public body as the Delivery Body could ensure that minimal costs are passed directly onto consumers.

**Question 14: Please provide views on the consumer protections we are considering. Are there other protections that we should consider?**

Consumer protections must be at the heart of any opt-in or opt-out switching mechanism. It is particularly important that access for older consumers is maximised and any barriers to market engagement are eliminated.

BEIS's proposals for the opt-in switching mechanism also interact with sweeping reforms to the WHD and ECO. The interactions between these programmes are an essential component of addressing the loyalty penalty. As BEIS moves to address the loyalty penalty it is essential that these wider reforms do not leave any low-income or fuel poor consumer without financial support.

While reforms to the WHD and ECO will lower supplier thresholds there are still gaps in provision (e.g. suppliers exhausting their limited spending allocation or suppliers with less than 1,000 customers who have no WHD commitments). The Government must protect these consumers to avoid customers who have been with a supplier long-term, who consistently received the WHD, suddenly finding themselves without support after being prompted to switch supplier.

We welcome BEIS's efforts to account for the data protection implications of their proposals. While we recognise that suppliers will be obligated to investigate new customers' PSR eligibility we are concerned that after an opt-in or opt-out switch some suppliers will not be aware of a consumer's PSR status or that there may be gaps in PSR registration due to the switching process. We encourage BEIS to investigate options for

securely transferring a household's PSR status to a new supplier after opt-in or opt-out switching has taken place.

To improve consumer protections BEIS should commit to discourage or prohibit exit fees levied by suppliers who provide tariffs via the opt-in switching mechanism. During the Collective Switch trials the maximum exit fee was set at £30 per fuel. Age UK supports replicating exit fee restrictions for suppliers who promote tariffs via the opt-in switching mechanism and recommends that they are further minimised or prohibited.

We are also concerned about the prospect of older consumers only benefiting temporarily from any opt-in switching mechanism. Opt-in tariffs could rollover into expensive default tariffs without the additional protection of the price cap if it is revised or removed. Evidence from the Collective Switch trials suggest that follow up prompts when a tariff is coming to an end encourage consumers to continue switching and engaging with the energy market<sup>32</sup>. BEIS must ensure that older consumers who have been targeted for opt-in switching are prompted to switch tariff again when the tariff comes to an end. If this is not possible because of the incremental roll-out of the scheme then other protections should be put in place to ensure that the opt-in tariff switching process has a positive longer term impact on consumers paying the loyalty penalty.

**Question 16: If the Delivery Body is chosen to send out the prompt, do you think that the proposed functions and the data required by the Delivery Body set out in Table 1 are appropriate? Are there any of other data fields that you think should also be included?**

Data on eligibility or receipt of ECO should also be included. While eligibility for ECO and the WHD will be broadly similar once present proposals for the new schemes come into effect from 2022, the considerations regarding alternative arrangements for ECO and WHD eligible consumers differ slightly. If it is necessary to identify alternative processes for supporting ECO eligible households the Delivery Body will need to have data on whether a household is entitled.

**Question 17: Do you agree that participating consumers should not be followed-up outside of the scheme? Do you think that the framework for the scheme should include the Delivery Body following-up and re-prompting consumers who previously switched through the scheme?**

As stated in our response to question 14 we are concerned that older consumers may only benefit temporarily from the opt-in switching mechanism. BEIS must ensure that the Delivery Body re-prompts older consumers to switch tariff again when their original opt-in tariff comes to an end. If this is not possible then other protections should be put in place to ensure that the opt-in tariff switching process has a positive longer-term impact on older consumers.

**Question 21: How might the opt-in scheme be designed to help facilitate reaching the UK's 2050 net-zero target?**

The Energy Retail Strategy reinforced the need for opt-in switching to support the transition to net-zero<sup>33</sup>. Part of this process was to include decarbonising supportive tariffs. We recommend that BEIS investigates ways to include such tariffs as a standard component of opt-in and opt-out switching. It is important that this is balanced against any additional cost increases for consumers. As decarbonising supportive tariffs are introduced it is crucial that customers using gas heating are not excluded from the opt-in or opt-out switching process.

ECO serves as a critical component of ensuring access to the net-zero transition for low-income older consumers. The implications of opt-in switching on the revised ECO4 scheme have been broadly overlooked in this consultation. BEIS can better account for ECO4 in three ways.

Firstly, BEIS should ensure that any supplier bidding for a collective tariff under a Collective Switch scheme has sufficient ECO spending to cover any additional customer obligations. More broadly, BEIS must ensure that no fuel poor or low-income consumer is switched onto a supplier that does not provide support through ECO.

Secondly, the Government must guarantee consumers' ECO entitlements. This will require a commitment from BEIS to ensure that if a new supplier under the opt-in switching mechanism fails to provide ECO support then the Government will step in to cover the cost.

Thirdly, information on eligibility or receipt of ECO should also be included in the data provided to the Delivery Body for its opt-in mechanism prompts. This will allow the Delivery body to identify alternative processes for supporting ECO eligible households if the opt-in switching mechanism would switch consumers to a supplier that does not have sufficient ECO commitments.

**Question 22: Do you think that we have identified appropriate testing aims? Please specify if there are areas you do not think we should focus on or if there is anything you think we should also include or take into consideration?**

We welcome BEIS's commitment to investigate the differential impact of opt-out switching on various segments of the consumer market. BEIS should ensure that it focuses on older consumers as one of its segmented breakdowns, as we need greater understanding of how to engage with this cohort for several reasons, partly because many are offline and partly because the consequences of staying on inappropriate tariffs can be high. This must also take into account the differential impact of opt-out switching on digitally excluded consumers. In the process of investigating the impact on older and digitally excluded consumers BEIS must address any ethical constraints to ensure that consumers do not face any adverse effects from being involved in opt-out testing. This must include a

guarantee from Government to cover any support measure entitlements, such as the WHD or ECO, which consumers miss out on due to being involved in opt-out testing.

As opt-out switching is a longer-term goal, BEIS also needs to consider what future innovations will be required to support those who are digitally excluded. The barriers faced by people who remain offline will have shifted significantly between opt-out testing and implementation and it is likely a narrower group of vulnerable consumers will be affected. Adapting to these future needs and ensuring innovation and improved customer interfaces are at the heart of opt-out switching is essential. BEIS should commit to future collaboration with voluntary and community organisations to help reach people who continue to face barriers to accessing the internet.

BEIS must also investigate the appropriateness of PPM opt-out switching and resolve any risks to this cohort of consumers if it is to facilitate better market engagement. As discussed in our response to question six, PPM customers are frequently the most vulnerable consumers in the energy market, facing additional barriers to switching supplier and higher costs for switching<sup>34</sup>. These issues are compounded by higher levels of digital exclusion, a lack of clear guidance and reduced confidence when switching. BEIS should commit to investigating ways of better including PPM tariffs in opt-out switching, particularly as PPM customers may have the most to gain from a successful opt-out switching mechanism.

This will require BEIS and Ofgem to ensure that protections are in place to address any practical limitations with switching supplier when consumers are on a PPM. We outlined some of these practical limitations in our response to question six. We reinforce the need for BEIS to assess whether the nature of preliminary opt-out testing creates too great a risk for PPM customers, as it may pose unique risks for these consumers (e.g. an increased risk of being unable to top-up their meter during an unprompted switch). We are also aware that limited competition for tariffs may also make opt-out switching unviable for PPM customers, as it is less likely to result in a reduction in consumer bills. To address this, BEIS should consider subsidising PPM bills for those enrolled on the testing scheme.

BEIS must also include a testing aim focused on exploring gaming risks and the possibility of scams. We reinforce the need to minimise these risks. Because the opt-out process will deliberately bypass consumer engagement there is a risk that some consumers will either be victims of switching scams or will believe that their switch is a form of scam itself. BEIS must account for this in their proposals and investigate how gaming risks and scams manifest and can be addressed.

We wish to reinforce that vulnerable consumers who are disengaged from the energy market likely stand to gain the most from a successful opt-out switching scheme. As a result, we would encourage BEIS to investigate ways of safely including PSR consumers and those who are in receipt of support schemes like the WHD in opt-out testing. While inclusion of these groups presents additional ethical concerns at the testing stage, it is important that those who stand to gain the most from opt-out switching are involved in any trials of the scheme. We reinforce our previous comments that consumer support payments, such as the WHD, must be guaranteed by the Government to ensure no

consumer misses out on their entitlement due to a supplier switch. It will also be essential that BEIS investigates methods of switching PSR membership automatically to a new supplier during any opt-out switching process. Any trials involving PSR consumers must have safeguards in place to ensure that none of their additional consumer protections are missed due to involvement in any opt-out testing.

**Question 24: Do you agree with our assessment of the PPM market and proposed approach of keeping PPM within the testing framework's scope, and assessing closer to implementation whether PPM consumers should be targeted?**

As stated in our response to question 22 we would like to see BEIS investigate the impact of opt-out switching on PPM customers, subject to sufficient support being in place to overcome inherent practical constraints and risks to PPM consumers.

**Question 25: Do you agree that the testing should target a subset of suppliers? If so, on what basis should those suppliers be selected?**

We agree with BEIS's proposal to use the existing criteria Ofgem proposed in their testing of consumer retail market engagement.

**Question 27: Do you agree that tariffs should not be compared on variables other than price for testing, but there should be some minimum standards for non-price variables such as customer service? If yes, which variables should be included and how should they be measured/what should be the minimum standard?**

As discussed in our response to question 14 we are concerned about consumers being switched to suppliers with insufficient support mechanisms. While BEIS is not proposing to target WHD recipients in the opt-out testing there is a risk that consumers who may not have previously been in receipt of support may want to access it after they have been switched. We would therefore recommend that any supplier selected for opt-out testing must have sufficient support spending, including WHD and ECO, to cover additional customer obligations. We reinforce that appropriate customer service is also essential and recommend that priority be given to suppliers who provide online, telephone and postal forms of customer interaction.

**Question 28: What methods could be used to help maximise consumer engagement with the opt-out option and communication?**

While opt-out switching provides opportunities for greater market engagement, it also poses the risk of increasing customer confusion and anxiety. It is essential the mechanism does not leave any consumers unable to opt-out of a tariff switch. BEIS must put consumer access at the centre of the testing scheme.



As discussed in our response to question one, digital exclusion is a major barrier to older consumer engagement. Maximising engagement will require the opt-out mechanism to be available via online, telephone and postal formats. All materials sent to consumers relating to opt-out switching must be provided via online and offline formats. BEIS must also require that any opt-out scheme is promoted through a broad range of sources, including print media, mail drops, and community and voluntary organisations. BEIS must also consider additional consumer communication requirements, for example where there is a language barrier or a consumer has a relevant disability or long-term health condition (e.g. a visual impairment).

**Question 29: What action should consumers be required to take to opt out of the arranged switch? Do you agree with our proposals in section 3.5.1?**

We welcome BEIS's commitment to ensuring the action required to opt-out is made as simple as possible and support a framework whereby a consumer can choose to simply opt-out of the recommended tariff switch. BEIS's proposals for more complex opt-out options may better address the loyalty penalty but they also risk causing additional confusion or anxiety for consumers. This is particularly true if they are forced to exit their present default tariff as part of opting out. BEIS should carefully consider how consumer anxiety or confusion can be minimised if mandatory switching becomes part of the opt-out process. This is particularly important for vulnerable consumers or those who are digitally excluded.

**Question 30: How should the testing allow consumers to easily switch back to their previous supplier should they wish to? Would only restricting exit fees for the new tariff be sufficient? Should we consider any other options?**

Ofgem's Faster and More Reliable Switching Programme means that tariff switching should occur within 14 days from summer 2022. While this will mean many consumers are able to challenge the switch using the existing 14 day cooling off period for some it will be too late. We therefore encourage the Government to investigate extending the cooling off period to allow consumers to switch back to their previous supplier. Alternatively, the start of the 14-day cooling off period could be activated only after the consumer has been fully switched to the new supplier. We would also encourage BEIS to restrict or remove exit fees for tariffs available via the opt-out mechanism.

**Question 31: Do you agree with our proposed approaches to setting up new payments with standard credit and Direct Debit customers?**

We agree with the proposed approach to standard credit consumers, whereby the new supplier communicates with the new customer and provides them with an invoice which replaces that from the previous supplier.

We recognise the difficulties presented by automatically transferring Direct Debit customers to a new supplier. Subject to sufficient consumer protections being in place, an approach which automatically transfers the customer's existing Direct Debit is preferred. Given the present challenges with setting up this system, we agree with the proposed temporary standard credit tariff or induction period methods. We strongly reinforce the need to monitor any risk of scams or gaming of the opt-out scheme during testing. We also reinforce that some consumers may forget or be unable to cancel their previous Direct Debit with their existing supplier. If this occurs, assurances must be made that the previous supplier will not automatically charge further payments. Regardless of the payment system used consumers should never face being billed twice for their energy use.

**Question 32: Are there any other approaches or variations to the options outlined we should consider to help make the process as simply as possible for consumers?**

For Direct Debit customers, BEIS could limit the scope of opt-out trials to only internal switching to a tariff with a customer's existing supplier. BEIS could ensure each supplier who takes part has a specific opt-out tariff. Consumers who are switched onto this tariff would therefore only need to be switched internally. This would mean their Direct Debit can be securely transferred within the same supplier. This approach may have limited validity outside of the trials, and may limit bill savings, but it could be used as an alternative for the purposes of testing.

**Question 33: What, if any, practical challenges do you see for opt-out switching for PPM consumers, and how might these be overcome?**

We outlined the practical constraints of opt-in and opt-out switching for PPM customers in our response to questions six and 22. BEIS must address these practical constraints and commit to investigating ways to better include PPM tariffs in opt-out testing. This will require BEIS and Ofgem to also ensure that protections are in place to address any additional practical limitations with opt-out switching when consumers are on a PPM, particularly as consumers will not always be actively engaged in the switch. It is essential that BEIS put in place a meter top-up system which guarantees consumers can continue topping up throughout the switching process.

**Question 34: Do you agree with the highlighted potential consumer risks that the scheme will need to consider? Do you think there are risks that we may have missed or other things to consider? Do you agree with our proposed approach to these risks? Are there other protections we should consider?**

In our response to question 14 we outlined our concerns regarding WHD, ECO and wider support payment recipients during any switching process. BEIS must ensure that consumers who receive support do not lose out because they have been switched.

We agree that BEIS must account for consumer debt in the opt-out mechanism, particularly in relation to PPM debt. Under present Ofgem licence conditions PPM customers with over £500 of gas or electricity debt are unable to switch supplier<sup>35</sup>. This condition risks excluding the most vulnerable indebted consumers from the opt-out mechanism. BEIS and Ofgem must commit to revising this licence condition and the Debt Assignment Protocol so that customers with higher debt levels can transfer their debt to a new supplier with an appropriate repayment plan in place. We reinforce the need to ensure customer repayment plans and any other debt support are transferred to the new supplier during a switch.

We welcome BEIS's commitment to better account for the needs of those in vulnerable circumstances and those who are digitally excluded. We recommend that BEIS ensures the full opt-out process is accessible via online, telephone and postal methods. This must include the reverse switch process.

**Question 35: What types (for instance, by duration) of tariffs do you think participants in testing should be switched to?**

While the length of a tariff is important, we are most concerned with what happens when the tariff comes to an end. We outlined in response to question 14 that we are concerned older consumers may only benefit temporarily from an opt-in switching mechanism. Opt-out tariffs could also rollover into expensive default tariffs without the additional protection of the price cap, if it is removed. Evidence from the Collective Switch trials suggest that follow up prompts encourage consumers to continue switching and engaging with the energy market<sup>36</sup>. BEIS must ensure that older consumers who have been targeted for opt-out switching are offered the opportunity to switch again via the opt-out mechanism when their existing tariff comes to an end. If this is not possible, further protections should be put in place to ensure that the opt-out tariff switching process has a positive longer-term impact on consumers paying the loyalty penalty.

**Question 36: Do you agree that the opt-out communication should be administered by and addressed from the Delivery Body, but that also including the incumbent supplier's branding should be tested?**

In terms of the inclusion of the Delivery Body on the communication materials, we reinforce the need to appoint an appropriate Delivery Body which can be trusted by the public. As outlined in our response to question 11 we recommend the appointment of BEIS, Ofgem or an appropriate public body as the Delivery Body. This will ensure that minimal delivery costs are passed directly onto consumers and will likely improve consumer confidence with any opt-out communications if BEIS chooses to include the Delivery Body's information.

**Question 37: Should the Delivery Body administer the opt-out communication, do you agree with the proposed data fields in Table 2 that the Delivery Body would require from the incumbent supplier to administer the opt-out communication with the consumer? Are there other identifiers that we should consider to enable consumers with certain characteristics to be identified, with an alternative approach applied?**

As described in our response to question 16, data on eligibility or receipt of ECO should also be included. opt-out switching trials are unlikely to target ECO recipients, as they will avoid targeting WHD recipients, but as explained in our response to question 27, there is still a risk that WHD recipients will end up on the testing programme. Given that BEIS are standardising the eligibility criteria for ECO and WHD recipients there is also a risk that consumers eligible for ECO will be included in the scheme. Therefore, BEIS should gather data on this aspect while undertaking testing to assess ECO eligibility amongst the trial cohort. This will allow the Delivery Body to ensure that ECO eligible consumers are transferred to a supplier with sufficient ECO spending to cover additional commitments.

**Question 40: Do you agree that the Delivery Body should be the point of contact in communication to initiate a reverse switch and empowered to represent the consumer in this process, including by enacting their rights (subject to the protections in place) when engaging with the new and old supplier?**

We agree with this approach.

**Question 45: How could the barriers to switching be reduced for indebted consumers?**

As outlined in our response to questions six and 34, BEIS must reduce the barriers to engaging with the opt-in and opt-out mechanisms for consumers in debt. This is particularly important in relation to PPM customers. We strongly reinforce the need to ensure customer repayment plans and any other debt support are transferred to the new supplier during a switch.

**Question 46: How could opt-in switching and opt-out testing be designed to effectively support indebted consumers?**

As stated in our response to questions six and 34, we strongly reinforce the need to ensure customer repayment plans and any other debt support measures are transferred to the new supplier during any opt-in or opt-out switch.



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<sup>1</sup> BEIS, 2021. Annual Fuel Poverty Statistics in England, 2021 (2019 data). Department for Business, Energy and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/966509/Annual\\_Fuel\\_Poverty\\_Statistics\\_LILEE\\_Report\\_2021\\_2019\\_data\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/966509/Annual_Fuel_Poverty_Statistics_LILEE_Report_2021_2019_data_.pdf). [Accessed 05/08/21].

<sup>2</sup> BEIS, 2021. Annual Fuel Poverty Statistics in England, 2021 (2019 data). Department for Business, Energy and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/966509/Annual\\_Fuel\\_Poverty\\_Statistics\\_LILEE\\_Report\\_2021\\_2019\\_data\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/966509/Annual_Fuel_Poverty_Statistics_LILEE_Report_2021_2019_data_.pdf). [Accessed 05/08/21].

<sup>3</sup> Customers who stick with the same service or utility provider for prolonged periods often pay a premium as they remain on uncompetitive deals. This form of market disengagement is called the loyalty penalty. Older people are hit particularly hard and it is a major concern in the energy market. Many disengaged consumers remain on default energy tariffs for several years without switching supplier or asking for a new tariff from their existing provider. These default tariffs are often expensive. See: Citizens Advice, 2018. *Loyalty penalty*. Citizens Advice. [Online]. Available at: <https://www.citizensadvice.org.uk/about-us/our-work/our-campaigns/all-our-current-campaigns/citizens-advice-super-complaint-on-the-loyalty-penalty/>. [Accessed 07/10/21].

<sup>4</sup> BEIS, 2021. Annual Fuel Poverty Statistics in England, 2021 (2019 data). Department for Business, Energy and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/966509/Annual\\_Fuel\\_Poverty\\_Statistics\\_LILEE\\_Report\\_2021\\_2019\\_data\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/966509/Annual_Fuel_Poverty_Statistics_LILEE_Report_2021_2019_data_.pdf). [Accessed 05/08/21].

<sup>5</sup> Age UK, 2021. Warm Home Discount: Better Targeted Support from 2022. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/consultation-responses-and-submissions/safe-at-home/warm-home-discount---better-targeted-support-from-2022.pdf>. [Accessed 07/10/21].

<sup>6</sup> Age UK, 2021. Energy Company Obligation ECO4: 2022 – 2026. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/consultation-responses-and-submissions/energy-company-obligation-eco4---maintaining-energy-efficiency-support-from-2022.pdf>. [Accessed 07/10/21].

<sup>7</sup> Ofgem, 2019. *Ofgem's Collective Switch Trials*. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/publications/ofgems-collective-switch-trials>. [Accessed 05/10/21].

<sup>8</sup> Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].

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<sup>9</sup> Ofgem, 2019. Consumer Survey 2019: Consumer Engagement Survey Tables – Table 637. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/publications/consumer-survey-2019>. [Accessed 07/10/21].

<sup>10</sup> Ofgem, 2021. *Switching energy tariff or supplier*. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/information-consumers/energy-advice-households/switching-energy-tariff-or-supplier#:~:text=You%20can%20still%20switch%20if,for%20less%20than%2028%20days.&text=You'll%20need%20to%20repay,fault%20you're%20in%20debt>. [Accessed 04/10/21].

<sup>11</sup> Energy suppliers are able to prevent indebted consumers from switching to a different supplier if they have been in debt to their supplier for more than 27 days. This is called a debt objection. The Debt Assignment Protocol allows consumers to challenge this decision so they can complete a switch to a new supplier. The Protocol can only be used by consumers with less than £500 of electricity and gas debt. Energy UK, 2016. *Debt Assignment Protocol*. Energy UK. [Online]. Available at: <https://www.energy-uk.org.uk/publication.html?task=file.download&id=5937>. [Accessed 14/10/21].

<sup>12</sup> NEA, 2021. Smart Prepay: Benefits, Challenges, Solutions. National Energy Action. [Online]. Available at: <https://www.nea.org.uk/wp-content/uploads/2021/06/Smart-Prepay-Full-Report.pdf>. [Accessed 14/10/21].

<sup>13</sup> EFCP, 2021. Energy bills set to hit highest peak since price cap introduced. End Fuel Poverty Coalition. [Online]. Available at: <http://www.endfuelpoverty.org.uk/energy-bills-set-to-hit-highest-peak-since-price-cap-introduced/>. [Accessed 29/09/21].

<sup>14</sup> BEIS, 2021. Energy Retail Market Strategy for the 2020s. Department for Business, Energy and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005307/energy-retail-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005307/energy-retail-strategy.pdf). [Accessed 14/10/21].

<sup>15</sup> BEIS, 2021. Energy Retail Market Strategy for the 2020s. Department for Business, Energy and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005307/energy-retail-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005307/energy-retail-strategy.pdf). [Accessed 14/10/21].

<sup>16</sup> BEIS, 2015. Smart Metering Early Learning Project. Department for Business, Energy and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/407543/3\\_Smart\\_Metering\\_Early\\_Learning\\_Project\\_-\\_Consumer\\_survey\\_and\\_qual\\_research\\_-\\_Main\\_report\\_FINAL\\_CORRECTED.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/407543/3_Smart_Metering_Early_Learning_Project_-_Consumer_survey_and_qual_research_-_Main_report_FINAL_CORRECTED.pdf). [Accessed 28/06/21].

<sup>17</sup> Citizens Advice, 2017. *Smart support: Support for vulnerable consumers in the smart meter roll-out*. Citizens Advice.

<sup>18</sup> NEA, 2021. Smart Prepay: Benefits, Challenges, Solutions. National Energy Action. [Online]. Available at: <https://www.nea.org.uk/wp-content/uploads/2021/06/Smart-Prepay-Full-Report.pdf>. [Accessed 14/10/21].

<sup>19</sup> Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].

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- <sup>20</sup> Ofgem, 2019. Consumer Survey 2019: Consumer Engagement Survey Tables – Table 637. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/publications/consumer-survey-2019>. [Accessed 07/10/21].
- <sup>21</sup> Citizens Advice, 2018. Loyalty penalty. Citizens Advice. [Online]. Available at: <https://www.citizensadvice.org.uk/about-us/our-work/our-campaigns/all-our-current-campaigns/citizens-advice-super-complaint-on-the-loyalty-penalty/>. [Accessed 04/10/21].
- <sup>22</sup> BEIS, 2021. Annual Fuel Poverty Statistics in England, 2021 (2019 data). Department for Business, Energy and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/966509/Annual\\_Fuel\\_Poverty\\_Statistics\\_LILEE\\_Report\\_2021\\_2019\\_data.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/966509/Annual_Fuel_Poverty_Statistics_LILEE_Report_2021_2019_data.pdf). [Accessed 05/08/21].
- <sup>23</sup> Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].
- <sup>24</sup> BEIS, 2021. Annual Fuel Poverty Statistics in England, 2021 (2019 data). Department for Business, Energy and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/966509/Annual\\_Fuel\\_Poverty\\_Statistics\\_LILEE\\_Report\\_2021\\_2019\\_data.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/966509/Annual_Fuel_Poverty_Statistics_LILEE_Report_2021_2019_data.pdf). [Accessed 05/08/21].
- <sup>25</sup> NEA, 2021. *Maximising the smart meter rollout for prepayment customers*. National Energy Action. [Online]. Available at: <https://www.nea.org.uk/wp-content/uploads/2021/06/Smart-Prepay-Full-Report.pdf>. [Accessed 04/10/21]. Pg9.
- <sup>26</sup> NEA, 2021. *Maximising the smart meter rollout for prepayment customers*. National Energy Action. [Online]. Available at: <https://www.nea.org.uk/wp-content/uploads/2021/06/Smart-Prepay-Full-Report.pdf>. [Accessed 04/10/21]. Pg9.
- <sup>27</sup> NEA, 2021. *Smart Prepay: Benefits, Challenges, Solutions*. National Energy Action. [Online]. Available at: <https://www.nea.org.uk/wp-content/uploads/2021/06/Smart-Prepay-Full-Report.pdf>. [Accessed 14/10/21].
- <sup>28</sup> Ofgem, 2021. *Switching energy tariff or supplier*. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/information-consumers/energy-advice-households/switching-energy-tariff-or-supplier#:~:text=You%20can%20still%20switch%20if,for%20less%20than%2028%20days.&text=You'll%20need%20to%20repay,fault%20you're%20in%20debt>. [Accessed 04/10/21].
- <sup>29</sup> Age UK, 2021. *Consultation Response: Warm Home Discount: Better Targeted Support from 2022*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/consultation-responses-and-submissions/safe-at-home/warm-home-discount---better-targeted-support-from-2022.pdf>. [Accessed 04/10/21]. Pg9.
- <sup>30</sup> EFCP, 2021. Energy bills set to hit highest peak since price cap introduced. End Fuel Poverty Coalition. [Online]. Available at: <http://www.endfuelpoverty.org.uk/energy-bills-set-to-hit-highest-peak-since-price-cap-introduced/>. [Accessed 29/09/21].
- <sup>31</sup> Ofgem, 2019. *Ofgem's Collective Switch Trials*. Ofgem. [Online]. Available at: [https://www.ofgem.gov.uk/sites/default/files/docs/2019/09/collective\\_switch\\_slides\\_for\\_publication.pdf](https://www.ofgem.gov.uk/sites/default/files/docs/2019/09/collective_switch_slides_for_publication.pdf). [Accessed 05/10/21].



---

<sup>32</sup> Ofgem, 2019. Prompting Sustained Engagement in Energy Tariff Switching. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/publications/prompting-sustained-engagement-energy-tariff-switching>. [Accessed 05/10/21].

<sup>33</sup> BEIS, 2021. Energy Retail Market Strategy for the 2020s. Department for Business, Energy and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005307/energy-retail-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005307/energy-retail-strategy.pdf). [Accessed 14/10/21].

<sup>34</sup> NEA, 2021. *Maximising the smart meter rollout for prepayment customers*. National Energy Action. [Online]. Available at: <https://www.nea.org.uk/wp-content/uploads/2021/06/Smart-Prepay-Full-Report.pdf>. [Accessed 04/10/21]. Pg9.

<sup>35</sup> Ofgem, 2021. *Switching energy tariff or supplier*. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/information-consumers/energy-advice-households/switching-energy-tariff-or-supplier#:~:text=You%20can%20still%20switch%20if,for%20less%20than%2028%20days.&text=You'll%20need%20to%20repay,fault%20you're%20in%20debt>. [Accessed 04/10/21].

<sup>36</sup> Ofgem, 2019. Prompting Sustained Engagement in Energy Tariff Switching. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/publications/prompting-sustained-engagement-energy-tariff-switching>. [Accessed 05/10/21].