28th April 2016

CER Consultation: CER / 16 / 031

Review of the Electricity and Gas Suppliers Handbook

Energy Action welcomes the opportunity to respond to this important consultation which we believe can make a meaningful contribution to the lives of householders living in fuel poverty and / or struggling with energy affordability.

The proposed changes are well aligned with the Energy Action agenda, including a focus on the needs of the most disadvantaged and vulnerable in society, and specifically:

- spreading the benefits of energy markets to make energy more affordable to greater numbers of customers, particularly the fuel poor

- greater education and awareness of, and potential remedies for, the impact of fuel poverty on households. There may be a requirement to supply literature in different languages.

In particular we note and support the delivery of a set of overarching objectives as a framework for protection of customers, targeting improvements in the marketing and sales approaches of the energy companies, broader engagement opportunities in the energy market, protection of vulnerable customers and those in financial difficulty and the fuel poor.

Specifically we welcome:

- Proposed improvements in the marketing and sign up code to deliver greater transparency in the quality and accessibility of information for customers (including fuel poor householders) dealing with sales agents. This includes leaving a cancellation form.

- The proposals to improve customer participation in the energy market and the range of initiatives outlined to enhance that engagement, including:
  - The requirement to proactively contact customers who are more than 3 years on standard rates
The proposal that all offers will be available to all customers (no discrimination between existing and new)

Measures to improve customers ability to understand and compare price offers.

Continuing discounts for billing and method of payment.
Energy Companies informing customer of contract renewal 30 days before due date.
Keeping accredited price comparison websites updated to achieve true comparisons.
Agree proposal for suppliers to respond to the CER decision to a complaint resolution within 3 weeks from date of the decision confirming that the CER decision has implemented

- Measures to enhance identification and protection of vulnerable customers including the revised Code of practice on Vulnerable customers and PAYG Metering – we are very supportive particularly of proposed improvements in identification of vulnerable customers at sign up, in the proposed follow up for change in the type of vulnerability, on the suitability of PAYG meters for vulnerable customers and monitoring of non-vends. PAYG customers should receive bills at least on a quarterly basis. These changes will make a real difference to customers offering greater security and peace of mind.

A core issue for us is ongoing energy affordability and fuel poverty for householders. We would like to see extended and enduring best prices and discounts available for the fuel poor. It is critical that alleviation of fuel poverty is a continuing key objective for CER as the principle protector of consumer’s in the energy area.

Thank you again for the opportunity to respond on these matters which are of critical importance to Energy Action. We look forward to the next stage in this process which we hope can be expedited given the importance of the issues raised for fuel poor customers.

Charlie Roarty
Energy Action