#### **Citizens Advice**



### Consumer work plan 2023-24



#### **Foreword**

Since our last annual work plan, we've seen unprecedented demand for advice. With a cost of living crisis driven by historically high energy prices, our role as consumer advocate has taken on a renewed urgency.

Our teams nationally and locally have responded quickly to help consumers through these difficult times. Our data continues to show elevated need and on energy alone we helped more people in 2022 than in 2019 and 2020 combined.

As the crisis deepens, ensuring a fair deal for consumers - and particularly for people from marginalised groups - remains essential. New technologies, products and services can deliver savings but only if they are designed with the interests of consumers at their heart.

Delivering net zero ambitions is also central to a future energy market and is a long term response to high energy costs. But as markets change quickly, it is again vital that the consumer voice is heard.

#### The four main themes for our work in 2023/24 are:

- Making markets work for consumers speaking out on behalf of consumers where there are market failures
- Better value infrastructure making sure investment is well managed to deliver value for money and good consumer outcomes
- A fair deal for consumers in vulnerable circumstances so that those most likely to suffer harm can access good value products and services
- Protecting consumers in rapidly evolving markets maximising the opportunities presented by innovation to change and improve the way markets serve consumers

These themes will guide our advocacy work in the coming year. We also recognise that in such a fast-changing world, our work will need to be agile and adaptive, since policy decisions that would previously have been subject to months of debate are now having to be made in weeks and days.

We remain committed to delivering positive outcomes for consumers throughout the difficult year ahead.

Matthew Upton

Interim Executive Director of Policy and Advocacy

#### **Equity, diversity and inclusion (EDI)**

We have 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:

- Using our work on <u>discriminatory pricing</u> to inform the Financial Conduct Authority (FCA)'s thinking about how to tackle the 'ethnicity penalty' in insurance markets
- Using our data and evidence to successfully secure the Government Cost of Living payments including £150 for every disabled person who receives an eligible disability benefit
- Using our evidence to secure a change in the Government's Smart Meter Programme to ensure that accessible In Home Displays are available to all disabled smart meter users

To ensure that equity, diversity and inclusion considerations are at the heart of all our advocacy work, we have made a number of changes to the ways in which we design and prioritise our work. These include:

- 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 on a monthly basis 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
- Appointing a specialist EDI and policy officer to lead our work in this area.

#### **Equity, diversity and inclusion (EDI)**

In addition, we've built new tools and programmes to help us ensure that our policy work is supporting marginalised communities including:

- Our <u>EDI dashboard</u> which illustrates the issues clients are coming to us about by protected characteristics, including intersectionality this means we can identify the policy areas where our work will have the greatest impact on marginalised groups
- Our Citizens Advice <u>cost-of-living data dashboard</u> which shows the impact of the crisis on different groups (including by protected characteristics) and clearly demonstrates the fact that the cost-of-living crisis is not impacting everyone equally.

We've made both of these tools publicly available, and hold regular cost-of-living dashboard events to allow us to share our data with key stakeholders and demonstrate the inequitable nature of this crisis. We will continue to ensure that equity, diversity and inclusion considerations are at the heart of all our advocacy work and that we're championing the needs of marginalised groups.



#### 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	

#### A robust and impactful approach

# 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.

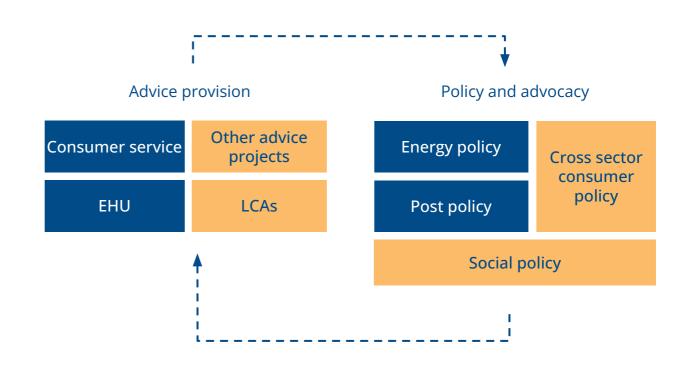
#### How our advice and advocacy roles support each other



Our **local Citizens Advice offices (LCAs)** provide face-to-face advice on a range of issues in approximately 2,300 locations across England and Wales.

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

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.



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. 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.

# Work plan projects

Our energy, post and cross-sector consumer projects for 2022-23

#### Four themes for our work

Applying these principles, this document sets out our plans for 2022-23. There are 4 themes for our work this year.

**Making markets work for consumers** 

**Better value infrastructure** 

A fair deal for consumers in vulnerable circumstances

**Protecting consumers in rapidly evolving markets** 

For each theme we have also included success stories from the past year. More information about our work from 2021-22 can be found in our **Annual Report**.

We have also indicated which sector each project covers with these icons:



The rise in the cost of living is having a huge impact on the money consumers have available after paying for essential goods and services. This makes it more important than ever that markets work well for consumers. This year our work will focus on improving outcomes for consumers in markets where regulation and consumer protections are patchy. Our work will consider the impact on consumers across England, Wales and Scotland.



### Improving the consumer experience in the energy market

We will continue to work directly with energy suppliers, maintaining bi-lateral relationships and drawing on Consumer Service and Extra Help Unit data, social media monitoring and Local Citizens Advice data to provide insights on areas where improvements are needed. We will also provide consumers with the information they need to make informed choices about their energy supplier, building on the respected position our Star Rating has gained across the wider industry as the leading indicator of customer service performance.

We will also continue to collaborate with Ofgem on a tracking survey of consumer experience in the market, particularly focusing on the impact of supplier failure and debt support. We will ensure that our insight into the experiences of micro-businesses support decision makers in keeping the doors of Britain's smallest businesses open.

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#### Financing of home decarbonisation measures

Energy bills have reached unprecedented levels. Government support via the Energy Price Guarantee will end in April 2024, and the home energy efficiency measures that would help to bring down bills remain unaffordable for many.

For those households who are able to consider installing energy efficiency measures, their payback periods are dropping as prices rise. New financial products bundled with tariff contracts that allow for the installation of energy saving measures at no upfront cost are also being introduced, with consumer protection regulations struggling to keep apace.

Existing support programmes are insufficient to support all people looking to make the changes to their homes. We will identify gaps in support and where additional funding may help those most disadvantaged by high energy bills, including people on low incomes and in the private rented sector.

In addition, for those households able to take up financial products to address the upfront cost, we need to understand what kinds of financial products will be needed to support increased uptake of energy efficiency measures and the transition to net zero.

This year we will undertake research with consumers to get a clear idea of their needs in regards to financing green home improvements. We will work with energy retailers as well as financial institutions such as the UK Infrastructure Bank, Green Finance Institute and Development Bank of Wales to understand the kinds of financial products that could be available and how closely those could align to consumer need.

#### Continuing to support consumers through the cost of living crisis

The last year has seen consumers hit hard by rising costs across the board. Rapidly rising rents, massive hikes in energy bills and soaring inflation have squeezed people on all fronts. With inflation showing no signs of slowing down, supporting people struggling to make ends meet will continue to be at the core of our consumer advocacy work in the coming year.

We will monitor the impact of rising costs on consumer behaviours, in particular areas where people are having to cut back on their spending. Through this we will continue to highlight opportunities for companies in different sectors to provide crucial lifelines for consumers struggling to afford basic goods and services. Where appropriate, we will make the case for regulators to step in to protect consumers from detriment resulting from the unexpected rise in the cost of living - for example, by finding ways to help consumers retain essential insurance protections when their premiums have become unaffordable.



### Learning from crises: lessons in how markets work for low income consumers

Over the last few years, the pandemic and the cost of living crisis have caused significant financial upheaval for millions of households. Crises are the ultimate stress test, exposing and exacerbating often long-standing problems in markets. The last few years have highlighted the value of effective forbearance and the need for markets to make provision for people on unstable or low-incomes. In many cases, it has shown the absence of measures like this - to the detriment of consumers. often those in the most vulnerable circumstances.

Looking back at how markets and regulators have responded to successive crises, we will explore what worked well, and where improvements could be made to future market resilience. Building upon the work we carried out in the energy sector in 22/23, we'll look at price protections that are in place across different sectors, such as social tariffs, and explore where these could be appropriately applied or adapted in different markets. We'll also look at how the UK Government, sector regulators and firms can best support people in both temporary and long-term financial difficulty, and what solutions are available to protect consumers from future challenges.

#### Protecting and strengthening USO regulation

The postal Universal Service Obligation (USO) is a safety net of basic postal services and should keep post fair and affordable. There are debates about the future of the USO, specifically about whether Saturday letter deliveries should continue. This would be a big step away from the current USO specification. And it would be hard to return to the current specification if changes were made. It is important to have a strong consumer advocate at the table when these discussions take place.

Postal regulations should contribute to good consumer outcomes. In 2023/24 we will continue to research and advocate for a regulatory framework that is good for consumers and prevents harm. We will:

- Represent consumers' interests in discussions about the future of the USO by engaging with Royal Mail, Ofcom and government and by commissioning tactical research.
- Monitor Royal Mail's "elective safeplace" policy to make sure it doesn't lead to consumer harm.
- Monitor the take-up of the voluntary concessionary rate for residential redirections. This is available to millions of consumers in receipt of Universal Credit and other benefits, but it's currently unclear if the discount is helping the movers who are entitled to this support.

 Respond to consultations to advocate for improved consumer outcomes. We'll work with Ofcom, industry and other consumer advocacy bodies, including Consumer Scotland and the Consumer Council of Northern Ireland.

#### Post affordability in a cost of living crisis

Ofcom's data show that 1 in 4 people have cut back on sending post to be able to afford essentials — like food or heating. This is a 4 fold increase in 5 years. Post should be universal and affordable — yet these latest figures suggest that's not the case.

Our Cost of Living dashboard shows people on low incomes are forced to make tough choices. For example, a single person aged 25 or over whose only income is Universal Credit could be left with just £5 at the end of the month, after they've paid for food, energy and water. A book of 4 1st class stamps costs £5.80.

In the coming year, we will:

- Represent consumers' interests by campaigning for Ofcom to keep its 2nd class price caps in place as a minimum price protection in a monopolistic market. We'll commission tactical research where needed.
- Monitor Ofcom's data on the lack of affordability for basic postal products

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### Holding Royal Mail accountable for delivering for consumers

Royal Mail's quality of service target for 1st class mail is 93%. This means that more than 9 in 10 1st class items should be delivered the next working day. But in both 2020/21 and 2021/22, Royal Mail didn't meet this target. Our research found that almost 15 million people were hit by Royal Mail letter delays over the festive period in 2021. Royal Mail said its operations were affected by the ongoing effects of the Covid-19 pandemic and related self-isolation. But nevertheless, quality of service is really important to consumers and Citizens Advice will continue to play our role in understanding the challenges in this area and holding Royal Mail to account.

#### In 2023/24, we will:

- Monitor any Royal Mail delivery delays. If we observe quality of service issues in 2023/24, we'll continue to engage with Royal Mail and Ofcom and provide advice for consumers.
- Continue to make the case for a Christmas floor on Royal Mail's quality of service targets so that consumers can have confidence their mail will be delivered.

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#### Support for small businesses reliant on postal services

Previous research has found that small and microbusinesses heavily rely on post and parcels services. These businesses face new challenges in the context of rising inflation and living costs, as well as a post-pandemic and post-Brexit world. It's important that postal services serve the needs of microbusinesses as they navigate this challenging environment.

In the coming year, Citizens Advice will continue to explore how small and microbusinesses use postal services, and the problems they currently face. As the statutory advocate for microbusinesses, we will seek to develop solutions to ensure that postal services are helping these businesses to grow.

#### We will:

- Publish outputs exploring the experiences of microbusinesses using post and parcels, based on quantitative research commissioned in 2022/23.
- Work with key stakeholders, including business and consumer groups, to ensure solutions meet the needs of microbusinesses.

#### Making markets work for consumers: success stories

### Energy efficiency to support consumers through the cost of living crisis

The cost of living crisis is likely to continue for the next few years. And energy prices are likely to increase before they are predicted to begin falling in late 2023. We need to transition away from reactive crisis support and to do this we will need a long-term, sustainable solution to bring down energy bills. In our report, Insulation Nation, we outlined our proposal to do just that. We called for a Great British Energy Efficiency Scheme which could save consumers up to £950 a year on their energy bills.

Our proposals were well received by stakeholders and has been presented in various public for a including the Committee on Fuel Poverty, PRASEG and to MPs at parliamentary drop-ins. Our proposals have also been spotlighted by other organisations, including in a recently published report by the CEBR on Powering Energy Efficiency in Germany and the United Kingdom. And our asks have been echoed in a letter from the chair of the Climate Change Committee, Lord Deben.

#### Raising awareness of the impact of Royal Mail delays

Consumers should be able to expect a reliable and efficient letter delivery service. Letter delays affect even those who aren't regular post users themselves, as many organisations and institutions communicate by post. Delayed letters can result in financial loss, a negative impact on credit scores or increased waiting times for medical appointments.

Our research found that almost 15 million people across the UK were left waiting for letters over the Christmas period in 2021. As a result, we estimate 2.5 million people missed important documents, health appointments, or were unable to pay a fine or bills - sometimes resulting in further penalties. This was the second year running that we sounded the alarm on Royal Mail delays.

Citizens Advice research and insight on letter delays was quoted by MPs in oral and written questions to the postal services minister and in the debate pack ahead of the Westminster Hall debate on the Performance of Royal Mail in June 2021. Our research also featured widely across national and regional broadcast and media.

We called for Ofcom to open an investigation into Royal Mail's poor performance to hold the company accountable for the widespread letter delays. In May 2022, the regulator announced an investigation into Royal Mail's quality of service.

#### Making markets work for consumers: success stories



#### A fairer deal for mobile and broadband consumers

In 2022 we published a report on mid-contract price rises (MCPR) in mobile and broadband markets. We calculated that consumers in these markets facing these rises were going to be paying an estimated £2.5 billion extra for mobile and broadband services in 2023, thanks to most rises being tied to inflation, projected to hit around 12% at the start of 2023. Our report highlighted the substantial impact these price hikes would have on consumers already struggling to make ends meet and that consumers are often either unaware that prices can rise or by how much. We made the case that firms should scrap all MCPR for 2023 to support customers with the cost of living and that they should consider moving away from the model entirely.

In response to our report, Ofcom publicly called on telecoms firms to scrap the inflation-tied formula used to calculated MCPR, and questioned the whether large prices rises could be justified during an acute cost of living crisis. Our report also played a key role in a sustained media focus on MCPR in the autumn of 2022. In October 2022, Ofcom opened an investigation into EE over a potential lack of clarity in the new contract information they provide to consumers with MCPR highlighted as a key area of concern for contract information. In concert with influencing work from by the Post and Telecoms Team around social tariffs, the attention we drew to mid-contract price hikes also prompted Ofcom to order some of the biggest ISPs that don't currently offer a social tariff - TalkTalk, EE, Plusnet, Shell Energy and Vodafone - to introduce such tariffs as soon as possible. In response, Vodafone launched a new affordable internet tariff for benefit recipients in October 2022.



### More evidence on how to improve consumer experiences of EV public charging

Currently our public charging network is patchy and lacks capacity to meet people's needs. We are concerned that those relying on public charging aren't having a good enough experience.

We completed qualitative research following people's experiences using the EV public charging network, focusing on people without access to home charging. We found that people relying on public charging face challenges related to availability and reliability of chargepoints, charging cost and price transparency, consistency of the charging process and difficulties planning ahead.

Our findings have been feed into the Office for Zero Emission Vehicles' (OZEV) development of regulations for chargepoint providers. We welcomed proposals to require chargepoint operators to use a standardised "price per kwh" metric and the rollout of a new helpline for people experiencing problems at chargepoints.

#### **Better value infrastructure**

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.

#### Fixing the gaps in the post office network

In the last 10 years the overall size of the post office network has remained stable. But at the same time we've seen more than an 80% increase in the number of part-time outreach services where post office services are provided for an average of 5 and a half hours a week. Whilst the number of full-time post offices, where services are provided for an average of 59 hours a week, has fallen by more than 1,000. 1 in 3 rural post offices in Britain are now provided as part-time outreach services. This is making it more difficult for

people in affected communities to access post office services.

It is particularly challenging in rural areas, and for those who face barriers to travelling long distances, such as older and disabled people. Our discussions with post office operators show that low income and high running costs are the biggest challenges they face in retaining and replacing full-time post offices. The situation has been brought into greater focus by Morrison's recent decision to close 55 post offices following it's takeover of McColl's.

In this context and other challenges, the network faces an uncertain future. There are some big decisions about how to protect access to services for people in vulnerable circumstances while making the most of opportunities, such as the new ways younger consumers use the network.

In the coming year, we will:

- Understand what access to the post office network and services people really need, and what aspects of a post office are most important, such as the range of services, access, and opening hours
- Work collaboratively with Post Office Ltd, the Department for Business, Energy & Industrial Strategy, and other stakeholders to make sure the post office meets consumers' and small business needs
- Track engagement with post office consultations, and monitor network changes
- Continue to engage closely with operators, charities, and consumer groups to share information on post office issues through bilateral meetings, the Post Offices Advisory Group, and newsletters

#### **Better value infrastructure**

### Enhancing consumer experience in the smart meter roll-out

Smart meters are now in 50% of homes. We will continue to focus on the issues that matter most to people such whether customers believe that their smart meters are delivering promised benefits, installation experiences, experiences of in-home displays, and the experiences of people moving into a house with a smart meter.

In line with our focus on ensuring access to new business models, we will work to understand the differences in access to smart metering across different demographic groups. This will help decision makers deliver smart meter products and services that allow all consumers to participate in the transition to net zero.

### Framework for decommissioning gas networks in heat decarbonisation

As other forms of heating our homes become more common, the gas networks may need to be decommissioned if no low-carbon alternative use can be found for gas pipes and infrastructure. The network may need to be decommissioned in a piecemeal way (area by area) or in totality.

At present, there is no strategic view or planning to determine the optimal way of decommissioning the gas networks, if necessary, nor how to pay for the remaining investment costs of the gas networks. We will work with other stakeholders to assess the best options for any gas network decommissioning including determining appropriate and fair ways of paying for the infrastructure costs that remain.

### Price control for transmission, gas distribution and the Electricity System Operator (ESO)

Ensuring the network companies are held accountable for performance is important for consumers. This should enable the companies to effectively re-prioritise as consumers' needs develop, without waiting for a formal review. We will consider how performance monitoring can be improved, including the visibility of performance. This should also make the job of setting new performance targets easier.

The consideration of the next price control period will start this year for the gas and electricity transmission sectors, for gas distribution, and the ESO. We will continue our research, analysis, challenge, and scrutiny of the proposals for these sectors in the coming years of the price control process to ensure consumers get the value for money services that they want and need.

#### **Better value infrastructure**

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#### Putting communities at the heart of LAEPS

As we get closer to our national target of reaching net zero by 2050, the role that Local Area Energy Plans (LAEPs) play in helping us get there will only increase. It's vital that local areas are able to transition in a way that makes the most sense for their local industries, infrastructure and communities. We'd like to see local people given more of a say in how this process works and in particular, on the changes that will impact their everyday lives.

This coming year we will publish research to help build a blueprint for how local communities can be properly engaged in Local Area Energy Plans (LAEPs) through deliberative research methods. We will use our findings to support local authorities and others to fully engage with local people - and help us make the case that the transition to net zero has to be people-centred.

#### **Better value infrastructure: success stories**

### Ensuring energy networks provide services that consumers want and need at a value for money cost

We influenced the Ofgem RIIO-ED2 price control for 2023-2028 consultations for the electricity distribution sector via direct bilaterals, consultation responses, blogs, and challenge groups. We have made extensive inputs into the electricity distribution sector business plans and Ofgem's Draft Determinations. The final decision is strong progress with wins for consumers including:

- Allowed returns on investment are around 20% lower than current levels, resulting in over £200 million in lower costs for consumers
- Allowed expenditure £3 billion lower than requested meaning investment for net zero can be made without increasing network costs
- More challenging targets for reducing the duration of power cuts

We provided evidence to the Ofgem investigation of networks' responses to Storm Arwen using our extensive customer contacts, and gave recommendations for improvements. Ofgem's report reflects our proposals.

We have led the scrutiny of gas distribution networks' (GDNs) spending regarding consumer vulnerability. This scrutiny is vital in ensuring consumers get the full benefits from the increased spending on vulnerability we had previously successfully argued for.

#### Better value infrastructure: success stories

### Ensuring consumers are at the heart of the energy system transformation

National Grid Electricity System Operator (ESO) reviewed and revised its consumer strategy for its new business plan following our collaborative input.

We formed the Consumer Interests Representation Advisory Group. This group provides guidance to the organisation, Innovate, on how consumer interests should be reflected in assessing innovation projects (funded through the Strategic Innovation Fund - SIF). This should ensure that consumers' interests are better represented in decision making.

Our facilitation work with a number of external parties has led to wider engagement with the SIF and has resulted in a number of different parties submitting innovation proposals.

Our input was also critical to GDNs agreeing to a common evaluation framework for village hydrogen trials.

#### Industry governance

The energy industry codes set out important arrangements about how the industry must operate, how parties interact with each other, and how costs worth £10's of billions are charged. The code modification processes enable codes to be amended or added to. We sit on a range of code panels to represent the interests of end consumers who may be directly or indirectly impacted by these changes.

For example, we engaged to ensure the protection given to suppliers from high balancing costs (at the expense of consumers) is at an appropriate level.

Extensive engagement was undertaken with the pivotal Market-wide Half Hourly Settlements programme. We have influenced to reduce the programme delivery and cost risks for consumers. We estimate that minimising industry-proposed delays will help save £10's of millions.

With our proactive engagement via the Smart Programme, we have achieved significant progress in improving energy supplier policies on In Home Displays (IHDs). This includes the creation of best practice in conjunction with BEIS (now DESNZ) and suppliers installation and support processes to ensure consumers are able to benefit from them.

Consumers in vulnerable circumstances are more likely to experience harm in the markets for essential services. 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. One way in which we can see this vulnerability coming through is in the proportion of our clients who can't meet their essential outgoings with their income. As of September 2022, this is now 48% of all our debt advice clients.

We will work to make sure consumers in vulnerable circumstances can easily access good value essential products and services.



#### **Exploring unequal outcomes in consumer markets**

All consumers should be able to secure good market outcomes, particularly in essential markets where access and affordability are key. But it is increasingly understood that some groups are more likely to experience poorly functioning markets, or be excluded from markets altogether, than others. This can be because they struggle to engage in complex or opaque markets, because they are less profitable to serve for firms (or are otherwise charged more for the same service than other groups), or because markets are not designed with their needs in mind.

Regulators have in the past demonstrated willingness to act to try and improve protections and accessibility for 'vulnerable consumers'. In part, we want to understand how successful this has been and where gaps remain but also to uncover the underlying causes of persistently poor outcomes for certain consumer groups. But we will also take a broad view of the experience of consumers from marginalised groups, to understand the extent to which they face poorer outcomes in terms of price, service, or access to consumer markets. We will explore these issues with a view to developing solutions that could meaningfully transform markets so that they work for all consumers.

#### **Ending post exclusion for millions of people**

Our research has found that in the decade leading up to 2020, 7 million people weren't able to access their post, often for significant periods of time, because they didn't have a fixed address or someone was intercepting it. The consequences include missed healthcare appointments, missed employment opportunities and huge debts built up in people's name without their knowledge. This problem particularly impacts marginalised groups like homeless people, survivors of domestic abuse and Gypsy and Traveller communities.

People are facing a cost of living crisis with skyrocketing bills, housing and food costs, making it even more likely that they might lose access to their post. Not only that, but when people do lose access to their post, it makes accessing services or support even harder.

This causes problems when people are facing unpaid bills and rising debts. For people struggling to access their post now, concerns around accessing healthcare in light of NHS backlogs, hard-to-get GP appointments and soaring demand for mental health support will be felt even more strongly.

We'll continue to advocate for a solution to the problem of post exclusion so that everyone can receive their letters. We want to see post become a truly universal service that everyone can benefit from.

#### To support this work we will:

- Continue engaging with charities who support people impacted by post exclusion
- Keep making the case to government, Ofcom and postal stakeholders that a solution needs to be found to stop more people facing significant harm
- Commission new research to find out whether more people are facing post exclusion, and if so, better understand their experience of not having access to their post in the midst of a cost of living crisis.



### **Exploring how people with protected characteristics experience postal services**

Postal services unlock access to essential services, but our existing research suggests that letter and parcel problems disproportionately cause harm to people with protected characteristics, including ethnicity, disability, gender or sexuality. We're therefore concerned that letter and parcel problems have the potential to amplify existing societal disadvantages.

We found that people of colour were significantly more likely to experience post delays, with over 5 in 10 people of colour experiencing a letter or parcel delay in comparison to 4 in 10 white people.

Over a third of people of colour reported experiencing serious negative consequences as a of a letter delay, such as being unable to pay a bill or missing a health appoiresult nument. This was twice as many as white respondents.

Our research has also consistently shown that disabled people are at the sharp end of parcel delivery problems. We found that two in five disabled people have had a problem with a parcel delivery in a single week. This compares to just 27% of people who don't identify as disabled.

#### In the next year, we will:

- Review our existing evidence base to improve our understanding of whether people with protected characteristics are disproportionately affected by problems in postal services;
- Commission targeted research if additional evidence is needed:
- Monitor the impact of Ofcom's new requirement for parcel firms to meet disabled consumers' needs.

### Helping people to manage energy debt and enhancing protections for prepayment customers

As a result of the cost of living crisis, more people are in debt to their energy suppliers than ever before - and the amount they owe is the highest on record. Debt is something that can be managed and suppliers have a duty to base debt repayment rates on a customer's 'ability to pay'. But our data shows people continue to be asked to repay amounts they cannot afford.

We will produce research focusing on identifying both the levels and impacts of a rise in energy debts. This will include reviewing whether existing protections are sufficient for the new scale of energy debt, the best customer journeys for discussing affordable repayment plans, and on identifying solutions to ensure participation in the retail market is possible in the future.

We will also continue our work to ensure that prepayment meter users are treated fairly and adequately protected from harm. In the first half of the year we will continue to feed into Ofgem's Market Compliance review on prepayment meters and investigation into the conduct of British Gas. We will then monitor the impact of these reviews to ensure that they feed through to tangible improvement in the treatment and of consumers in vulnerable circumstances and those who pay for their energy using a prepayment meter.

### Advocating for inclusive design in emerging business models

We welcomed the government's ambition to "help remove barriers for consumers who may otherwise struggle to participate in smart energy" and in 2022 we undertook exploratory qualitative research to increase understanding of the barriers different consumer groups may face to participating in smart energy technology. This research focused on the usability of technologies, rather than upfront financial barriers, and heard from groups such as disabled people, people who are digitally excluded, people with learning difficulties which impact literacy and people who speak English as an additional language.

In the coming year, we will use insights from this research to push for actions that achieve the government's ambition, through our participation in the Smart and Secure Electricity System (SSES) industry advisory group convened by DESNZ.

Investing in flexibility has the potential to deliver net savings of up to £16.7 billion per year by 2050 across the overall energy system. But unlocking the full benefits of demand side flexibility requires the participation of millions of consumers. Our research tells us that, for people to get involved with smart energy products and services, they need to feel confident about what they're signing up to, know where to go for help and have control of their own data.

Setting clear regulations and expectations for organisations involved in demand flexibility should help build consumer confidence and boost investment in the market. That's why we welcomed the government's proposals to regulate organisations with a role in load control this year.

Over the next year, we will continue to call for a sharper focus on the powerful role of consumers in this evolving market.

### Delivering sustainable targeted support for energy consumers

The energy market turmoil, the end to the Energy Bill Support Scheme from April 2023 and the Energy Price Guarantee in April 2024 could mean consumers in vulnerable circumstances, who are already making difficult choices between heating and eating, will face even more hardship.

We recently published the final report of our project with Social Market Foundation and Public First, outlining a framework for targeted energy price support that would help address affordability problems. We will continue to influence government plans for post April 2024 support for households.

### Extra Help Unit

The Extra Help Unit's (EHU) statutory duties and powers to investigate complex complaints for consumers in vulnerable circumstances gives us an in-depth understanding of emerging issues with particular suppliers. The EHU will continue to support these consumers, investigating their issues, obtaining financial redress and helping suppliers to improve their services. At present a large proportion of complaints being referred to the Extra Help Unit involve affordability concerns, especially prepayment tariff consumers who can't afford to add credit to their electricity and/or gas meter leaving them off supply. The EHU continues to work closely with suppliers and policy teams to ensure policies or processes causing detriment to consumers in vulnerable circumstances are addressed.

During 2022, the EHU introduced a new complaints management system to improve efficiencies in caseload management and tracking of supplier performance. For 2023 the EHU will expand on this work by introducing a supplier portal which will bring further efficiencies and allow for even better communication between suppliers and the EHU on complex casework.

In 2022 the EHU was accepted to take part in the Scottish Government's CivTech Challenge, 'How can technology help to quickly identify and prioritise support for people in the most vulnerable situations, starting with those having energy problems?'. This work will continue across 2023/24 with the hope of using technology to find a solution that makes the EHU safeguarding processes watertight, protecting the users of the service and the staff members delivering the service.

Comments taken from the EHU's October 2022 customer satisfaction survey (produced by Accent):

"The EHU were a port of call in an otherwise relentless storm with my energy provider. They helped me when I felt helpless and for that reason I am extremely grateful."

"They were wonderful. I couldn't get anywhere and they sorted it out straight away."

"There was understanding that others had not understood what had gone on before. They helped resolve the situation."

"Because they dealt with it. I had no electricity. I couldn't sit in the dark for two days or have my food defrosting. They got on to the problem straight away."

More information can be found at the EHU website: ehu.org.uk

### Improving outcomes for consumers during extreme weather events

In November 2021, Storm Arwen left over a million people without energy supply, some for over a week. Some were left without heating, in very cold temperatures, others, who have electric water pumps were left without water for drinking, cooking and washing.

In the event of outages, networks are required to provide compensation to consumers, up to a maximum of £700. After Storm Arwen this cap was lifted for people who were affected by the storm, due to the level of detriment they faced.

We will assess whether Ofgem's existing compensation methodology provides a fair level of compensation in the event of network disruption during periods of extreme weather. We will also look at how the methodology may be improved so that this support is targeted properly at those most affected by disruption. We will also look at what services are provided and when in power cuts and how this meets the needs of different groups.

### Levy funded energy advice: success stories Delivering better outcomes for energy consumers

We enhanced our web advice to address the impact of the Cost of Living crisis on people's mental and physical health. We have signposted mental health support from GPs, Mind, Samaritans, and SHOUT on our pages for those struggling to pay their energy bills.

Some of the health impacts are caused by people rationing their energy use to a detrimental level. We have reviewed our advice on how to cut energy usage, and developed new messaging to encourage people to look after their health and wellbeing, setting out what essential energy use includes, and signposting other avenues of support for anyone considering making drastic reductions. We are also reviewing the support available for those with disabilities or long term health conditions, and ensuring our advice promotes the uptake of the limited provisions that are available.

#### A fair deal for consumers in vulnerable circumstances: success stories

### Levy funded energy advice: delivering better outcomes for energy consumers

The cost of living crisis has hit our service with a surge of demand. This has broken unwelcome records over and over again. As demand continues to grow, we've reacted quickly and prioritised expanding our service to support more people, improving how we deliver advice as we go.

Levy funding in the first two quarters of 2022/23 has enabled us to provide personalised advice to approximately 100,000 consumers. Our advisors are having to support more people in crisis and navigate an increasingly changing and difficult energy market

Our Consumer Service advisers answered 84,291 energy contacts via telephone, webform, email and web chat.

We expanded our Big Energy Saving Network (BESN) project to be year round, recognising energy advice isn't seasonal anymore. It began in July and has already reached over **11,000 consumers** and 3,000 frontline workers. This has already resulted in reported savings of £1.1m for consumers.

We supported **4,055 clients** with one to one support through our energy advice project, making over £1.575m worth of income gains for our clients.

Our Energy Savers campaign has focussed on telling people what they need to know, when they need to know it. So far this year,

we've run a series of offline adverts including bus ads, radio ads and newspaper placements reaching over 10.3 million people.

We've built strong partnerships to enable us to reach 8 million **people** through prepayment top up receipts and engage hundreds of students through Freshers events. We've continued to use social media channels to reach new and existing audiences, with over **5.5 million people** reached through social media including over 4 million on TikTok. A further 10.2 million people were reached via our targeted social media ads.

We've had **2.61 million unique page views** of our energy web pages (excludes adviser visits), ensuring people had access to information about the new support schemes as well as continuing to improve the content of our core energy advice topics.

**Next year** we'll continue to respond to a growing cost of living crisis and scale our transformation of services, doing more pilots and building on existing learning. We'll scale our service to meet rising demand and work better with others to reach vulnerable clients and provide easy routes to our advice services including crisis support such as fuel vouchers.

Our BESN programme will be renamed the Energy Outreach Project (EOP) and we'll support our LCA and external partners to build and diversify their local partnerships.

More clients are being given energy efficiency advice and we'll iterate to improve the quality and accessibility of our advice to help people make savings as well as access their entitlements.

#### A fair deal for consumers in vulnerable circumstances: success stories



#### Accessibility standards for EV public chargepoints

We have previously advocated for better public charging experiences for all, including disabled people. We were therefore pleased that the government worked with the British Standards Institute (BSI) and stakeholders to develop and publish standards for accessible charging.

We participated in the review panel and responded to the consultation, pushing for less ambiguous phrasing, clear explanations of the enforcement process and the consideration of further learnings from other sectors. These points were reflected in the final standards.

Consumer markets are changing fast. The net zero transition will require big changes in how energy consumers use energy. It will also require markets to evolve rapidly to enable consumers to change behaviour and to retrofit their homes, including installing new low carbon heating technologies. All of these changes create huge challenges and opportunities. Regulatory protections will need to evolve to reflect this new world. We will develop and use compelling evidence on technology, market design and consumer insights to positively shape the consumer landscape of the future. This will maximise the benefits future changes can bring and minimise risks to consumers while ensuring that nobody is left behind.

#### Tackling discrimination in consumer markets

Regulators have a responsibility to ensure that markets work well for all consumers, and that firms are treating customers fairly. In practice this means ensuring that specific groups of consumers, particularly those with protected characteristics, do not face discriminatory outcomes.

Our research - which identified an 'ethnicity penalty' of over £200m a year impacting people of colour in the motor insurance market - raised questions about whether regulators are able to

effectively ensure firms are compliant with the Equality Act. As firms' access to consumer data increases, and the use of automated decision making expands, it is important that regulators are routinely monitoring for and mitigating against algorithmic bias in financial markets.

We have been working with regulators, government and sector partners, including the Centre for Data Ethics and Innovation (CDEI) to consider approaches regulators could use to monitor for unequal outcomes produced by pricing algorithms, explain or justify these outcomes in line with the Equality Act, and mitigate any discrimination identified.

In the coming year, we will monitor actions taken by regulators to ensure firms have the appropriate governance and compliance processes in place to assure against algorithmic bias. We will also explore how the framework we have developed could be applied to other consumer markets, or contribute to broader thinking undertaken by government and sector regulators into how best to regulate artificial intelligence and algorithmic decision making.

#### Delivering better design in digital markets

The growth of online spending, which was accelerated by the Covid-19 pandemic, represents new risks and well as opportunities for consumers. Research by regulators like the CMA has highlighted the potential of individual design features like drip pricing or the use of time pressures to be detrimental for consumers.

Our 2022 report Tricks of the Trade contributed to this evolving discussion by showing how regulators must pay attention to a whole customer journey and how design features work in concert with each other, rather than focusing on individual features. We focussed on three digital markets as case studies, and made recommendations for individual markets as well as setting out the need for a broad requirement on businesses to ensure that they consider their customers' best interests when making design decisions.

In 2023/24 we will further develop this strand of work by focussing in more detail on developing ideas on how consumer legislation, sectoral regulators and industry can create a framework to underpin and promote good design that benefits rather than harms consumers.

We will examine how consumer journeys can be designed in such a way that encourages consumer deliberation and caution where necessary and how particular design features can be put in place to protect particularly vulnerable consumers from

detriment in various online markets. We may also conduct further research into the role of design in delivering effective and intuitive consumer protection in specific high-risk markets.

#### Putting people at the heart of parcel delivery

According to Ofcom, nearly 4.2 billion items were delivered to households across the UK in 2020-21 - an increase of 50% on the previous year. Volumes have stayed high after Covid-19 lockdowns, which saw people shopping online and getting goods delivered, which shows that parcel delivery remains an essential service. The number of visits to our parcels online advice pages has levelled out at a higher level than before lockdowns, suggesting that online retail and delivery volumes will remain high.

Last year, our 2nd annual parcels league table found that consumers face poor service across the board. Scores were low for all of the Top 5 parcel companies, with none of the major companies reaching a 4 or 5-star service overall. This suggests that the issue is bigger than just a few poorly performing companies. This supports our position that the parcels market isn't delivering for consumers and that more needs to be done by Ofcom and parcel companies to deliver a better service.

We welcome Ofcom's changes to parcel regulation and its commitment to supporting disabled people and people wanting to complain. We know from our previous research that they face significant challenges in engaging with the parcels market.

But Ofcom's proposed changes don't go far enough to stop problems from happening in the first place, and problems are happening far too often. Our 2nd annual parcels league table found that over a third (35%) of those who'd had a parcel delivered in the last month experienced a problem. And, worryingly, almost half (46%) then faced further problems when resolving their parcel issue.

We want to see the parcel delivery market work for consumers. In the coming year we will:

- Work closely with parcel companies and Ofcom to make sure the changes proposed to help disabled people and people making complaints, are fit for purpose
- Continue to monitor the market's performance through our annual parcels league table
- Undertake research to understand the solutions needed to stop problems from happening in the first place, including reducing failed first time deliveries and strengthening mail integrity

#### Protecting consumers in the retrofit market

If households are looking to improve their home's energy efficiency, install low carbon technology or take up smart products and services, they need to navigate markets where rogue traders and scammers are rife. We will investigate the prevalence of scams in this market, revealing the types of scams

and trends we see in our consumer data, as well as the extent of the detriment to consumers.

We will use research and insight to show how scams undermine consumer confidence in decarbonising their homes, and advocate for tighter consumer protections that will improve outcomes for legitimate traders and their customers.

#### Regulatory reform in energy

Energy market turmoil has meant that many consumers have needed additional help and support. We outlined the impact of the failure of regulation to protect consumers in our December 2021 report "Market Meltdown." We will work to ensure that the retail market delivers better outcomes for consumers, with more robust consumer protection against poor practices. We will use our insight into how the existing price cap is working to inform the debate on how price protection may need to evolve.

To support discussions around how regulation fit for the future can be delivered, we will use our insight to articulate regulatory models that have already proven capable of driving positive outcomes for consumers such as a consumer duty.

### Ensuring that REMA delivers good outcomes for all consumers

Government is working on a package of reform to the wholesale electricity market, known as the Review of Electricity Market Arrangements (REMA). This will have consequences for suppliers in the retail market and for consumers themselves. Having responded to an initial consultation we will continue our work to make sure that changes to the wholesale market benefit all consumers.

We will commission research to better understand the impacts of different reforms on consumers, and how they might interact with changes to the retail energy market.

We will shape and participate in the end user forum with DESNZ to engage with the design process, and advocate more broadly for changes to wholesale markets to deliver better consumer outcomes.

#### **Explore** the benefits case of hydrogen for heating

It is necessary for Net Zero that natural gas boilers are replaced by alternative methods for heating homes and businesses. The UK Government is currently actively promoting the installation of heat pumps to electrify heating as well as exploring the potential role of hydrogen, with a decision on its use for heating due in 2026. We will scrutinise the benefits case of hydrogen for heating to better understand how hydrogen for home heating can contribute to net zero in a cost effective way that consumers can effectively engage with.

We will also continue monitoring and scrutinising hydrogen trial activities to represent consumer interests.

### Understanding the wider system benefits of energy efficiency

Better insulated homes not only reduce consumers bills but also reduce the need for energy generation and the pressure on the current energy system. It will also free up the existing network infrastructure's capacity to handle the increased uptake of low-carbon technologies like Electric Vehicles (EVs) and heat pumps, reducing the need for frequent upgrades.

Consumers pay for these upgrades through the network costs added on to their bills. We will aim to understand the wider system benefits of energy efficiency on network costs and how these could help reduce consumers' bills.

#### **Protecting consumers in rapidly evolving markets: success stories**



#### **Protecting consumers during the cost-of-living crisis**

Since the start of the cost-of-living crisis, Citizens Advice have campaigned to ensure that the issue is central to the government's agenda, sharing insights from the frontline and building the case for targeted support to help the worst affected with detailed insight of the emerging risks associated with energy debt and prepayment meters.

We called on the government to introduce both broad and targeted support to mitigate the impact of energy price hikes. Proposals included making the energy rebate a grant and additional targeted direct payments. In May the Chancellor announced a package which included doubling the value of the energy rebate and turning it into a grant, and providing additional targeted support to disabled people and people in receipt of benefits. And in September the Government announced an energy price guarantee, which limits the per unit price of energy that consumers will pay until April 2023.



### Securing wins for consumers from Ofcom's regulatory review

The Citizens Advice postal team has successfully advocated for positive changes in the postal market. We contributed extensively to Ofcom's regulatory process - from the Call for Inputs in 2021 through to the final consultation in 2022. We set out the harm consumers face in the postal market and

suggested innovative solutions to remedy these problems. When Ofcom published its final statement in July 2022, a large number of our policy asks were adopted by the regulator.

Office for National Statistics figures reveal that, in June 2022, people in Great Britain spent over £2 billion per week online. Parcels clearly remain an essential service for many - even after the pandemic. This is why we we've been making the case for stronger consumer protections to protect people in a rapidly growing market. We called for improved outcomes for disabled people and people wanting to complain - specifically for disabled people to be able to specify their accessibility needs and for complaints processes to be made easier and fairer. In their final statement, Ofcom announced new guidance to make sure parcels companies treat disabled consumers fairly, and to help firms handle customer complaints properly.

Although letter volumes have gone down, 8 billion addressed letters were sent last year. This means that it's important to have regulations in the letters market leading to good consumer outcomes. We urged Ofcom to keep the 2nd class price cap and the Quality of Service targets for Royal Mail. The regulator kept both of these in place. We also persuaded the regulator that redirections were too expensive for low-income households. Royal Mail put in place a voluntary discount at the end of 2021, but Ofcom was clear in its July 2022 statement: it would have proposed regulation if the new discount hadn't been introduced. The concessionary rate provides up to a 47% discount on

#### **Protecting consumers in rapidly evolving markets: success stories**

redirections. This means that a couple moving home will save £26.99 on a 6-month redirection as a result of our work.



### Highlighting the impact of discriminatory pricing in the insurance market

In 2022, we published research which identified an 'ethnicity penalty' in the motor insurance market. We found that people of colour are charged an average of £280 more than white customers for car insurance and that this trend could not be explained by demographic factors like age, gender or income, or common risk factors like crime rate.

When we launched our research regulators and industry responded positively, recognising that differential outcomes for people of colour represent an important public policy issue, and offering a commitment to continued engagement. Since, we have worked with regulators, government, industry and sector partners to explore what could be driving these outcomes, and how to tackle them. We have brought stakeholders together to build consensus around the most effective approaches for monitoring discriminatory outcomes in the insurance market, and consumer markets more broadly.

We have developed recommendations for regulatory interventions that could be made in the insurance market - and other consumer markets - to tackle this issue. We will continue to work to inform the Financial Conduct Authority (FCA)'s thinking about how to understand and address discriminatory outcomes for financial services consumers.



### Raising consumer awareness of Royal Mail's stamp Swap Out Scheme

Last year Royal Mail announced that they would be introducing new barcoded stamps. Royal Mail set up a stamp Swap Out Scheme to allow consumers to swap out their old non-barcoded stamps for new barcoded ones before 31st January 2023. The price of 1st class stamps has jumped by almost 50% in the last 5 years so, to prevent consumers from losing out on money previously spent on non-barcoded stamps, we created a series of outputs to raise awareness of this scheme.

In August 2022, we published a blog informing consumers how to swap out their stamps. We also published a tweet and a TikTok video. The TikTok video received over 26,000 views. We'll continue to raise consumer awareness of the Swap Out Scheme so that no one lose out on money they've spent on stamps. To do this, we'll engage with Royal Mail and other stakeholders including MPs.

#### 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 just some of the working groups, taskforces and panels we expect to participate in in the year ahead. This is not an exhaustive list, and we expect it to evolve during the year in line with policy developments.

#### **Fuel poverty**

Welsh Government Fuel Poverty Advisory Panel

**NEA Cymru: Fuel Poverty Coalition** 

#### **Retail market standards**

Energy UK Expert panel and stakeholder panel for Vulnerability Commitment Energy UK Compliance Panel for Switch Guarantee

#### **Smart homes**

Electric Vehicle Energy Taskforce Steering Group

Open Energy: Modernising Energy data Access Advisory group

Smart and Secure Electricity System (SSES) Industry Advisory Group

SSES Energy Smart Appliances (ESA) technical working group

**HOMEFlex Code working group** 

Smart and Fair? Advisory Board

#### Codes

Balancing and Settlement Code (BSC)
Panel

Uniform Network Code (UNC) Panel

Smart Energy Code (SEC) Panel

**SEC Change Board** 

Connection and Use of System Code (CUSC) Panel

Retail Energy Code (REC) Performance Assurance and Change Panel Boards

Smart Energy Strategic Working Group

We are also engaging with Energy Code Governance Reform to ensure consumer interests are central to the future operation of codes

#### Representing energy consumers in the policy development process

#### **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

#### **Net Zero / Future of heat**

Ofgem Net Zero Advisory Group

BSI Net Zero Strategic Advisory Group

**DESNZ Heat Networks Stakeholder Group** 

**Heat Trust Committee** 

**Future of Gas Steering Group** 

Renewable Energy Consumer Code Advisory Board

Gas Goes Green Review Group

DESNZ electrification of heat group

Sustainable Homes & Buildings Coalition Working Group

Social Housing Decarbonisation Fund Consultative Panel

#### **Better networks**

Electricity System Operator RIIO-2 Stakeholder Group

**Electricity System Operator Performance Panel** 

**Electricity Networks Strategy Group** 

Electricity Networks Association Open Networks Challenge Group

Resilience as a Service Advisory Group

Future Energy Grids for Wales Strategic Stakeholder Group

DESNZ Offshore transmission network review Expert advisory group

**DESNZ Electricity Transmission Network Planning** 

Marketwide Half Hourly Settlement Programme Steering Group

Capacity Market Advisory Group

#### RIIO-ED2

Strategy Delivery Incentive working group

Customer Satisfaction, Vulnerability and Connections Working Group

Decarbonisation and Environment Working Group

Safety, Reliability and Resilience Working Group

#### RIIO-GD2

Vulnerability and Carbon Monoxide Allowance Steering Group

#### **Provisional expenditure 2023-24**

Our proposed budget for 2023/24 sees expenditure on Citizens Advice core consumer advocacy increase by 4.7% in cash terms, which represents a 5% decrease in real terms. The Post budget has increased 3% in cash terms and decreased 6% in real terms. We have reduced the Post budget in both real and actual terms every year between 2016/17 and 2022/23. It has fallen by over £1.15m in that time and is now 52% lower in cash terms and 63% lower in real terms. This brings the total budget for 2023/24 to £6,381,000, which represents 16p per GB household.<sup>1</sup>

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.

This budget reflects funding allocated by the Department for Business and Trade (DBT) to advocate for consumers in England and Wales and it also includes funding allocated in collaboration between DBT and the Scottish government to reflect the interests of Scottish consumers in GB-wide decision-making.

#### **Core Consumer Advocacy Budget for 2023/24**

	Staff and related costs	Programme	Scotland	Total
Energy	£3,470,700	£513,200	£146,800	£4,130,700
Post	£962,900	£118,600	£31,900	£1,113,400
Cross-sector	£728,100	£131,100	£61,200	£920,400
Directorate	£206,700	£0	£9,800	£216,500
Total				£6,381,000

<sup>1</sup> 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. Other figures based on dividing the budget evenly amongst GB households.

#### **Provisional expenditure 2023-24**

In addition to our core consumer advocacy work in energy, in 2023/24, we're also pleased to oversee the Big Energy Saving Network (BESN) and Energy Savers Campaign.

We are requesting the same amount of funding as the previous year.

The total funding is equivalent to approximately 5p per GB household.<sup>2</sup>

#### **Core Consumer Advocacy Budget for 2023/24**

	Programme	Total
Energy advice programmes	£2,871,400	£2,871,400

<sup>2</sup> 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.

#### citizensadvice.org.uk







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