

Ofgem's call for input on engaging domestic consumers in energy flexibility

Citizens Advice response



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About Citizens Advice

We can all face problems that seem complicated or intimidating. At Citizens Advice we believe no one should have to face these problems without good quality, independent advice. We give people the knowledge and the confidence they need to find their way forward - whoever they are, and whatever their problem.

We provide support in approximately 2,500 locations across England and Wales with over 18,000 volunteers and 8,650 staff.

Through our advocacy work we aim to improve the policies and practices that affect people's lives. No one else sees so many people with so many different kinds of problems, and that gives us a unique insight into the challenges people are facing today.

As the statutory consumer watchdog for the energy and post industries we have an important role to play in shining a spotlight on the problems consumers encounter, providing solutions to these problems and ensuring their voices are heard when important decisions are made about the future of these essential markets.

Summary

A successful net zero transition must be one that is fair and inclusive. Building a market for energy flexibility with fairness and inclusion at its core will not only help people to lower their energy bills and cope with the cost of living, it will help companies' products and services to reach more people and make their business more financially viable and scalable.

We welcome Ofgem's call for input on engaging domestic consumers in energy flexibility and agree that an attractive, simple, and seamless customer journey is key to unlocking large-scale engagement.

Energy flexibility can only play a meaningful role in the net zero transition if the government takes proactive actions to help more people participate. We recently undertook qualitative research with domestic consumers and published our findings in [A flexible future](#), having identified a lack of evidence about the barriers people are likely to experience and what they need in order to participate.¹ We identified a range of barriers at each stage of the consumer journey of interacting with smart energy technology and energy flexibility. Our response primarily draws on the findings and recommendations from this work, as well as evidence from our previous research and external sources.

Broadly, we need to see a clear plan for how the government will support people who may otherwise struggle to participate in flexibility. This should prioritise 3 main outcomes: better **information**, appropriate **regulation** and inclusive **innovation**.

Below is an overview of the key points in our response.

- We recommend that the government invests in a national independent information campaign on how people can contribute to net zero, backed up by an impartial advice service. This should cover topics such as smart

¹ We heard from people who are likely to struggle to participate in energy flexibility, either because they face barriers to technology or they face barriers to changing their energy usage due to their household circumstances. Further details on the participants and research methodology can be found in the report: Citizens Advice (2023) [A flexible future: extending the benefits of energy flexibility to more people](#)

tariff comparison as well as energy efficiency and low-carbon heating options.

- Scaling up domestic DSR should be an important part of the net zero transition; it is a low-cost approach that can provide consumers with more control over their bills, while harnessing renewable energy and making savings for the grid. Diversification of who participates must be prioritised alongside scale, otherwise there's a risk that those benefiting will tend to be older, White British, on a higher income or homeowners.
- The ways that domestic DSR is provided should be varied, to provide consumers with choice. Key enablers for this are interoperability regulations and transparent information for consumers.
- A market with domestic DSR carries the risk of complicating the consumer journey, especially when things go wrong, so there must be clarity about where responsibilities lie. Different regulatory schemes must be clear and complementary.
- We want to see organisations testing, trialling and sharing good practice on the different ways to provide information and engage a more diverse range of consumers on domestic DSR. The government should facilitate this with innovation funding and the development of industry standards for accessible design.
- Engaging more domestic consumers in energy flexibility will take more than just efforts to increase motivation. The government and Ofgem must also focus on understanding and mitigating key barriers created by exclusion from support and opportunity.
- System-wide benefits must be shared amongst all consumers and there must be protections for people with insurmountable barriers to participating in energy flexibility, for example households with a health-related need for energy.
- "Clarity", "confidence" and "a compelling proposition" are important factors for engaging domestic consumers in DSR, but "support" should be specified as a crucial factor too.

- The government, Ofgem, industry and other stakeholders have important and distinct roles to play in engaging domestic consumers in DSR and making the consumer journey inclusive and fair.

Response

Q1 - To what extent do you think we are reliant on domestic DSR emerging at scale in the transition to a net zero energy system?

Achieving net zero should be at the lowest cost and deliver benefits to consumers. Domestic DSR is a low-cost mechanism, with the potential to benefit households with more control over their energy bills and access to cheaper energy prices, so we see a key role for domestic DSR in the net zero transition. This is echoed in National Grid ESO's [Future Energy Scenarios](#) work which concludes that "improved market signals and new distributed flexibility solutions are key to managing a secure, net zero energy system at lowest cost to the consumer." Cornwall Insight describes domestic flexibility as "a 'win-win-win': consumers win, the environment wins and the energy system wins."²

The growth of domestic DSR must be at scale in order to play a meaningful role. By 2035, 3.7 million households must be flexible on a regular basis at times of peak demand, up from the 1.6 million households that took part in the Demand Flexibility Service 2022/23.³ Reaching the wider participation needed is not only about scale, it's about the diversification of who participates. In an evaluation of the Demand Flexibility Service, respondents were typically older, White British, on a higher income or homeowners.⁴ Flexibility services will need to be accessible and appeal to many more people, including those with barriers to participation, to avoid inequitable outcomes.

Q2 - Do you think consumers and the system will have greater benefits if DSR is provided as a household proposition or as a service through individual assets (EVs, Heat Pumps)?

The ways that domestic DSR is provided should be varied in order to meet the different and transient circumstances of households. It's important that both models exist and develop in the market because the model that works best for an individual household will often depend on the household circumstances.

² Cornwall Insight (2023) [The power of flex: Rewarding smarter energy usage](#)

³ National Grid ESO (2023) [Bridging the gap to net zero](#)

⁴ Centre for Sustainable Energy, National Grid ESO (2023) [Household engagement with the Demand Flexibility Service 2022/23](#)

Households should have a choice about how they participate in domestic DSR and should have the information and support to help them benefit as much as possible.

For both models, interoperability between products and services is crucial. Consumers should have access to the benefits of interoperability regardless of the model through which they access domestic DSR. When software systems enabling DSR aggregation or energy smart appliances are not compatible, there is a risk that consumers become “locked in” or restricted to certain brands or parts of the sector.⁵ This can lead to a poorer experience, for example when consumers invest in a smart appliance which is incompatible with other smart products in their home. It could also lead to a lack of competition in the market; without easy switching and consumer choice, there are fewer incentives for organisations to innovate. We welcome the government’s focus on interoperability in its plans to regulate organisations with a role in load control and we are pushing for the interoperability requirements to deliver positive consumer outcomes.⁶

We know that consumers feel wary about investing in smart energy technology without the reassurance that it will work with other products and services.⁷ The government must mitigate against this barrier, by ensuring that the final requirements around interoperability are comprehensive. They should result in positive consumer outcomes, with products and services working together no matter the brand or type of product.

Transparent communication with consumers about such requirements will be necessary. We are calling for a national information campaign on how consumers can contribute to net zero; a key part of this should cover information about the different models of flexibility products and services available and what consumers should expect from organisations selling them.⁸

⁵ Association for Decentralised Energy, Citizens Advice and Energy UK (2022) [Demanding attention](#)

⁶ Citizens Advice (2022) [Citizens Advice response to BEIS’s consultation on delivering a smart and secure electricity system](#)

⁷ Citizens Advice (2023) [A flexible future: extending the benefits of energy flexibility to more people](#)

⁸ Ibid.

Q3 – How do you envision consumer relationships and engagement will change through the introduction of DSR?

Increasingly, consumers are likely to have relationships with several companies - sometimes a third party (e.g. the DSRSP) might be the main point of contact, but an energy supplier, an aggregator and a technology provider might provide services behind the scenes. This carries the risk of complicating the consumer journey, especially when things go wrong, which is why there must be clarity about where responsibilities lie.⁹ The consumer should know who to go to with a problem and they should only have to report it once.

We have previously raised concerns about poor consumer outcomes for some customers using third party intermediary (TPI) services that have partially taken on the primary customer relationship from the supplier, particularly auto-switching and bill splitting services which were used by a significant number of consumers prior to the retail market collapse in 2021.¹⁰ These offered benefits by making it easier to switch and sometimes provided additional services, but also led to harms if customers were unable to access support from their supplier or were switched to a product that didn't meet their needs. Some of these services offered poor value for money and, by disrupting the relationship with retailers, may not support wider aims for more flexible energy usage.

We called for these services to be regulated, similar to intermediaries in the banking sector (an approach which the CMA also found to be effective) and raised our concerns in the Government's call for evidence on TPIs.¹¹ While these services are not a significant feature of the market currently, they are likely to re-emerge if competition increases and new suppliers enter the market.

It will be important for consumers to have clarity over which aspects of their product are regulated and which are not. The design of any future load control licensing will need to take account of and adapt to the wider regulatory

⁹ Association for Decentralised Energy, Citizens Advice and Energy UK (2022) [Demanding attention](#)

¹⁰ Citizens Advice (2020) [Stuck in the middle: How to improve protections for people using energy third party intermediaries](#)

¹¹ Citizens Advice (2021) [Citizens Advice response to BEIS Call for Evidence on third-party intermediaries in the retail energy market](#)

landscape to ensure that any different regulatory schemes for firms providing different services are clear and complementary.

Q4 – How do you think consumers should be engaged on the nature and value of DSR? Do you think different consumer archetypes need to be engaged in specific ways, if so, which archetypes and how?

We think there should be a combination of high-level, broad-brush approaches to engaging people on the nature and value of DSR, as well as more tailored, specific approaches to support those with barriers to engagement. We're calling for a clear plan from the government on how it will support people who may otherwise struggle to participate in flexibility. This should prioritise 3 main outcomes: better information, appropriate regulation and inclusive innovation.¹²

We recommend that the government invests in a national independent information campaign on how people can contribute to net zero, backed up with impartial advice. This should cover topics such as smart tariff comparison as well as energy efficiency and low-carbon heating options. We know that general understanding of energy flexibility is low. In comprehension testing, we learned about people's understanding of a smart battery system when they were provided with 1 of 3 different information packs or 'treatments'. Overall, around 40% of consumers got something wrong when we tested them.¹³ We expect significant challenges in persuading consumers who have been unsatisfied with their experience of having a smart meter to engage with DSR. Forthcoming research tells us that just 5% of consumers who are unhappy with their smart meter have accessed new products and services, compared to 18% of people who are happy with their smart meter.¹⁴

An impartial net zero advice service should focus on the barriers that some groups are likely to face, such as low confidence in deciding which tariffs are right for them and digital exclusion. We know that consumers in some circumstances will need tailored support. Otherwise, the consumers losing out in today's energy market are likely to lose out in the future market, for example

¹² Citizens Advice (2023) [A flexible future: extending the benefits of energy flexibility to more people](#)

¹³ Citizens Advice (2020) [Powering up or facing resistance? How people understand the benefits of smart appliances](#)

¹⁴ Forthcoming, as yet unpublished research. Based on a representative poll of 4,058 adults (18+) in the UK conducted by Savanta for Citizens Advice, fieldwork conducted in August 2023.

people renting privately, disabled people and digitally excluded people.¹⁵ New forms and formats of energy market propositions could also give rise to new vulnerable circumstances. In the smart battery system comprehension testing, we found that there was a consistent 5-6% of individuals who scored below 25%, despite the fact participants were motivated to answer correctly through the amount of money they earned.¹⁶

On an industry level, we want to see organisations testing, trialling and sharing good practice on the different ways to provide information and engage consumers on domestic DSR. To facilitate this, we are calling for the government to provide dedicated funding for projects that aim to tackle barriers and achieve more diverse participation in energy flexibility and develop industry standards for designing accessible smart energy products and services. This is something that the industry representatives we heard from in our research told us they'd welcome.¹⁷ We see the Flexibility Innovation Programme (within the Net Zero Innovation Portfolio) and the Strategic Innovation Fund as opportunities to deliver this within existing frameworks.

National Grid ESO's Consumer Building Blocks project is developing a set of consumer archetypes which consider the future energy market.¹⁸ Ofgem should consult with ESO on this work as it considers how to define and engage different consumer archetypes. Based on case studies from our research, we have developed an interactive tool to demonstrate and consider the variety of compounding barriers that people may face at each stage of interacting with smart energy technology.¹⁹

Q5 - What will the primary motivators be that will encourage consumers to engage with DSR? Do you think these motivators will differ depending on consumer group?

Bringing together evidence on this from the various evaluations of DSR trials and services will be valuable and future evaluations should specifically seek to understand motivators further. Our research did not draw conclusions about

¹⁵ Citizens Advice (2019) [Future for all: Making a future retail energy market work for everyone](#)

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ National Grid ESO (2023) [What role will consumers play in the transition to net zero?](#)

¹⁹ Citizens Advice (2023) [Powering up participation: A guide to making smart energy technology more inclusive](#), p.4

the primary motivators, but participants shared with us that they would need to understand the benefits of participating and feel that financial incentives would make participation worthwhile.

A national information campaign should initially test and trial different forms of messaging with consumers. It should consider messaging that highlights the benefits of energy flexibility and helps people feel that 'we're in this together'.



With all the tech you're a bit scared when you first use it but you overcome the fear when you see how it improves your life



- Disabled participant based in London

We want the government to invest in research and evaluation projects that aim to understand what would motivate people to participate, including the right level of financial incentive, and how to achieve more diverse participation in energy flexibility.



It's not my cup of tea, I don't think you're going to save as much as they say



- Digitally excluded participant with additional mobility needs based in Cardiff



A real life example would work for me, so if someone was on the telly or on the radio or on social media ... someone a similar age to me who could say I knew nothing about smart appliances ... and now I'm saving x amount of money per month



- Digitally excluded participant with a vision impairment and a mental health condition, living in Leeds

There is research from other organisations that has looked at motivators for engagement in DSR. Nesta has carried out research in which they assessed the impact of different types of communication or 'treatments' on people's participation in energy app Loop's saving events as part of the Demand

Flexibility Service (DFS).²⁰ The results indicated that none of the interventions favourably changed opt-ins or electricity consumption during events – instead, they found some evidence of them having the opposite effect. Their findings suggested that trying to encourage more people to initially opt into the DFS may be more beneficial than trying to further motivate individuals to opt in to saving events. And minimising frictions to opting in to events may be optimal to increasing the energy savings people make.

The Centre for Sustainable Energy (CSE)'s evaluation of the DFS 2022/23 found that the most popular reason why survey respondents decided to sign up to the DFS was to reduce their energy bill. The second most popular reason was that they were interested in the challenge as to whether their household could do it. Unfortunately, involvement in the evaluation was not mandatory for providers and it did not analyse the findings by demographics or circumstances. We recommend that involvement in the next evaluation of the DFS 2023/24 should be mandatory for providers and the methodology should enable analysis by demographics and circumstances. This should help answer such questions about the differences between motivators for different consumer groups.

In addition to motivators, the government and Ofgem must also focus on understanding the key barriers created by exclusion from support (e.g. one-to-one advice or information in a simple format) and opportunity (e.g. the financial resources to invest in technology or a tariff that works for their household routine). In our recent research, we heard from people who were motivated to participate in flexibility but need support or opportunity-related solutions for them to participate.²¹



I just like the ease of things I guess ... If they're voice controlled you can control them via an Echo or something then that's even better



- Participant who is registered blind and lives in Leeds

²⁰ Nesta (2023) [The results of our research into energy-saving events: Assessing whether different types of communication could affect electricity usage](#)

²¹ Citizens Advice (2023) [A flexible future: extending the benefits of energy flexibility to more people](#)



With so many people living together ... there's all 4 hobs on and the oven on, usually between 7 and 9pm ... it would be very hard to change the timings of that

- Participant who lives in a private-rented shared household
in Stockport



Q6 – To what extent should the system wide benefits provided by DSR be shared amongst all consumers, even those who are less engaged or do not participate in DSR at all?

A fair net zero transition should deliver benefits to consumers and this should include those that do not participate in DSR. Ultimately, system-wide benefits should be shared amongst all consumers by passing on the savings made from fewer instances of system constraints and a reduced need for network upgrades.

Energy prices are likely to remain elevated in the coming years, and market outcomes will not deliver affordable energy for many consumers. To ensure a fair transition to net zero, the government must deliver energy efficiency upgrades and enduring bill support for households at most risk of fuel poverty.²²

Q7 – How can the customer journey in domestic DSR be made simple and seamless?

We agree with Ofgem's view that an attractive, simple, and seamless customer journey is key to unlocking large-scale engagement.²³

In our recent research, consumer participants envisioned a range of barriers at each stage of the consumer journey, from first becoming aware of the concept of energy flexibility or smart energy technology, to fixing problems once they're on a tariff or after technology is installed in their home.²⁴

²² Citizens Advice (2023) [Winter warning: The urgent case for energy bill support this winter](#)

²³ Ofgem (2023) [Engaging domestic consumers in energy flexibility: call for input](#)

²⁴ Citizens Advice (2023) [A flexible future: extending the benefits of energy flexibility to more people](#)

While we set out these stages in a linear fashion, in practice a consumer's interactions with smart energy technology and flexibility may not always happen in this order. For example, a consumer may move into a new home with some smart appliances already installed.

Awareness and perceptions of smart energy technology and flexibility

There is a clear need for awareness-raising and information to improve people's understanding about the benefits of energy flexibility.²⁵ That's why we're calling for a national information campaign about how people can contribute to net zero. This should cover topics such as smart tariff comparison as well as energy efficiency and low-carbon heating options.

In our recent research, the whole concept of energy flexibility was new to the majority of participants. Many reported feelings of overwhelm, weren't sure where they'd start and doubted their own ability to understand products and services. Polling from DESNZ asked people why they feel they're unlikely to switch to dynamic electricity tariff and a quarter of them said this was because they "don't know enough about this".²⁶ In comprehension testing as part of previous research, we learned about people's understanding of a smart battery system when they were provided with 1 of 3 'treatments'. Overall, around 40% of consumers got something wrong when we tested them.²⁷ There was also a consistent 5-6% of individuals who scored below 25%. This is despite the fact that participants were motivated to answer correctly through incentive payments.²⁸

A national information campaign would need to promote the benefits of participating in flexibility. The majority of people we heard from felt that the whole concept of asking domestic households to change what they do in their homes puts an unfair burden on households, when energy companies, government and non-domestic consumers should do more.

²⁵ Citizens Advice (2023) [A flexible future: extending the benefits of energy flexibility to more people](#)

²⁶ DESNZ (2023) [Public Attitudes Tracker: Energy Bills and Tariffs, Spring 2023, UK](#)

²⁷ Citizens Advice (2020) [Powering up or facing resistance? How people understand the benefits of smart appliances](#)

²⁸ Ibid.

In addition, participants doubted whether the financial reward would be sufficient for uprooting routines and investing in technology. The government should provide investment for more research and evaluation projects that aim to understand what would motivate people to participate, including the right level of financial incentive, and how to achieve more diverse participation in energy flexibility.

Selecting a suitable product, service or tariff

To complement a national information campaign, the government should invest in and expand statutory advice designed to offer impartial support on topics like smart tariff comparison.

Participants in our research were concerned about understanding and selecting the right tariff or product. Neurodivergent people and those with symptoms like “brain fog” or additional literacy needs felt the information they would have to understand to make the right choices would involve a significant mental load. Disabled people who used assistive technology were worried about the availability of compatible products they used to support independent living.

Affordability of smart products, the financial risk of being on a dynamic tariff, tenure barriers (those in the private-rented sector) and not having a smart meter were also cited as barriers to this stage of the DSR consumer journey. We know that particular groups are less likely to have a smart meter, for example 41% of private-rented households say they have a smart meter compared to 51% of owner-occupied households.²⁹

Setting up smart energy technology

Along with impartial advice and support, the government should develop industry standards for designing accessible products and services.

Research participants understood that automation could be used to minimise required interaction with smart energy technology day-to-day, but they were worried about how complicated it would be to set up the smart technology hardware and app interface with their preferences in the first place.

Using smart energy technology and being flexible with energy usage

The government should support industry to make products more accessible

²⁹ DESNZ (2023) [Public Attitudes Tracker: Energy Bills and Tariffs, Spring 2023, UK](#)

through more dedicated funding for projects that aim to tackle barriers and achieve more diverse participation in energy flexibility. Industry must learn from things like the rollout of the accessible in-home display (IHD) for smart meters and prioritise scalability, commercial viability and consumer engagement. Our forthcoming research tells us that 44% of those who think they'd benefit from an accessible IHD haven't been offered one by their supplier.³⁰

Participants were concerned DSR added complexity to current simple routines (for example, using an app to schedule when smart light bulbs are on and off, compared with the familiar experience of manually switching lights on and off) and were worried how they would troubleshoot problems using smart appliances. They felt unclear about how technologies actually work, for example whether their connected smart appliances would continue working if their wifi went down.

Q8 - Do you agree that these factors are important in ensuring an attractive and simple domestic customer journey in DSR is realised? Are there any other factors that should be considered?

Q9 - What barriers do you see to these factors in the domestic DSR customer journey being realised in practice?

We have consolidated our response to questions 8 and 9.

We agree that "clarity", "confidence" and "a compelling proposition" are all important factors in achieving an attractive and simple domestic customer journey. Focusing on these factors should help tackle several barriers. We would add that "support" is also crucial.

We agree that "**clarity**" is important, but we think the term "understanding" may be more suitable. While organisations may go to great lengths to make their products and services clear, the desired outcome should be good levels of understanding amongst consumers. Under this factor, Ofgem should emphasise the value of organisations testing and trialling their products and services with different consumer groups.

³⁰ Forthcoming, as yet unpublished research. Based on a representative poll of 4,058 adults (18+) in the UK conducted by Savanta for Citizens Advice, fieldwork conducted in August 2023.

We know that understanding amongst consumers about smart energy technology and energy flexibility is low and this creates a barrier to participation. In comprehension testing, we learned about people’s understanding of a smart battery system when they were provided with 1 of 3 different information packs or ‘treatments’. Overall, around 40% of consumers got something wrong when we tested them.³¹ Government investment in a national independent information campaign on how people can contribute to net zero, backed up by an impartial advice service, should also help tackle this barrier.

We agree that “accessible information” is an important part of ensuring consumers have a good understanding of DSR, though we propose specifying that an omnichannel approach to communications is needed to achieve inclusivity. Supporting guidance would need to set out what the regulating body expects from providers and provide good practice in making information accessible. This guidance should specify that information should be simple, in plain English and cater for people with English as an additional language or visual impairments.

In addition, we think the regulating body should specify that providers must make information available via multiple channels including freephone. In the energy supply market, Ofgem has proposed new rules specifying that energy suppliers must have contact methods that meet the needs of their customers and they expect them to provide a freephone number in order to do this.³² In the forthcoming regulation of the smart energy market, there is an opportunity to instate this from the beginning for flexibility providers and we think this would be a positive and proactive approach.

We think that “ease of use” would fit more appropriately under the “confidence” factor, as ease of use is more about engaging with rather than understanding DSR.

Instilling “**confidence**” will be vital for reassuring people that the smart energy market can be trusted and that they can expect a positive experience. In our recent research we heard that control and choice were important to people.³³

³¹ Citizens Advice (2020) [Powering up or facing resistance? How people understand the benefits of smart appliances](#)

³² Citizens Advice (2023) [Consumer standards statutory consultation](#)

³³ Citizens Advice (2023) [A flexible future: extending the benefits of energy flexibility to more people](#)

Indeed, a lack of these can create barriers for some people, such as those in private-rented shared households. Consumer participants wanted to be able to easily set up and update their preferences regarding things like appliance schedules and opt-in times for dynamic pricing.

We welcome the focus on enabling “the ability to switch flexibility providers.” Consumers should expect “fast and reliable” switching between providers and they should not lose out financially or otherwise, similar to the recent updated obligations on energy suppliers through the supply licence.³⁴ From our recent research, we know that a key barrier for consumers is lack of certainty over whether a product, service or tariff will benefit their household in practice.³⁵ People want to be able to find something suitable for their circumstances and household routine. We are conscious of the challenges to implementing such protection around switching, especially when bundled services or physical products are involved, but we’d like to see the exploration of innovative solutions to deliver this.



“Try before you buy ... Try it out for 6 months and see if you benefit.”

- Participant living in a privately-rented shared household in Stockport



We agree that “protection”, such as complaints handling procedures and protections for consumers in vulnerable circumstances, will be important. In addition, we think that “support” should be included. We found that, particularly for people with barriers to technology, the existence of support with setting up and using smart energy technology and engaging with energy flexibility would help tackle barriers created by circumstances like digital exclusion.³⁶ This support could be delivered by a variety of sources depending on the circumstances, including providers themselves and independent advice services.

³⁴ Ofgem (2022) [Decision on statutory consultations on licence changes for the Switching SCR](#)

³⁵ Citizens Advice (2023) [A flexible future: extending the benefits of energy flexibility to more people](#)

³⁶ Ibid.



“Somebody that knows the product and can tell us the best way of using it and set it up to a point where we can easily take over without thinking oh my god have I done something wrong ... that can give us the confidence to carry it on really”



- Participant who is registered blind and lives in Leeds

We agree that the DSR market needs to create **a compelling proposition** and we think this should focus on helping consumers to understand the benefits for their household. However, the success of making a compelling proposition relies on the mitigation of barriers to consumer understanding and confidence.

Q10 – What do you think is the role of government, Ofgem, industry and stakeholders in enabling an attractive and simple customer journey in domestic DSR?

The government, Ofgem, industry and other stakeholders all have important roles in bringing inclusivity and fairness to the domestic DSR consumer journey.

The government’s role should be about creating the right market conditions, setting out its expectations for industry, implementing policies that protect people from detriment and enable participation, and providing funding and resourcing for innovation trials and research.

With the forthcoming regulation of organisations with a role in load control, the government should swiftly enact legislation that provides a regulator (Ofgem) with the powers and authority to monitor and take enforcement action against poor practice, and appoints a statutory body to provide an advice service and advocate for domestic consumers. It must provide an appropriate level of funding to ensure that this service is properly resourced. In 2022/23, the consumer service helped save consumers a total of over £143 million.³⁷

Ofgem’s role should be about raising industry standards by setting clear expectations and sharing good practice, monitoring company practices and taking enforcement action against poor practice, and encouraging healthy competition in the market.

³⁷ Citizens Advice (2023) [Citizens Advice consumer advice and advocacy annual report 2022-2023](#)

Industry's role should be about developing innovative products and services that reach a wide, diverse market and prioritise inclusivity and fairness. Other important stakeholders include consumer organisations that should provide impartial advice and support for consumers and trade bodies that should advocate for and support industry to raise standards.

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