

**Citizens Advice
Response to
DECC's:
"Consultation on
User-supplier to
non-user supplier
churn"**

The logo for Citizens Advice, featuring a dark blue speech bubble with the words "citizens" and "advice" stacked vertically in white lowercase text.

**citizens
advice**

Introduction

The Citizens Advice service provides free, independent, confidential and impartial advice to everyone on their rights and responsibilities. It values diversity, promotes equality and challenges discrimination. Since 1 April 2014, Citizens Advice service took on the powers of Consumer Futures to become the statutory representative for energy consumers across Great Britain.

The service aims:

- To provide the advice people need for the problems they face
- To improve the policies and practices that affect people's lives.

The Citizens Advice service is a network of nearly 400 independent advice centres that provide free, impartial advice from more than 3,500 locations in England and Wales, including GPs' surgeries, hospitals, community centres, county courts and magistrates courts, and mobile services both in rural areas and to serve particular dispersed groups. In 2012/13 the Citizens Advice service in England and Wales advised 2.3 million people on 6.6 million problems.

Since April 2012 we have also operated the Citizens Advice Consumer Service, formerly run as Consumer Direct by the OFT. This telephone helpline covers Great Britain and provides free, confidential and impartial advice on all consumer issues.

In the last four quarters Citizens Advice Bureaux have dealt with 84,000 enquiries about fuel debt, while hits to the energy section of our website doubled in October and November, the period during which suppliers announced their price increases last year. Calls to the Citizens Advice Consumer Helpline seeking advice about energy doubled in the same period.

Initial Comments

Citizens Advice's welcomes the opportunity to respond to this consultation. Our primary concern throughout the smart meter rollout is to ensure a consistent and secure experience for consumers. During the smart meter foundation stage we have consistently seen a range of switching-related issues emerge for consumers, from early 'advanced' meters that other suppliers claimed they were unable to adopt let alone run as smart meters to more recent concerns about the loss of smart functionality for consumers with SMETS1 meters who switch that is likely to persist even after the DCC begins operations, the date for which has already suffered significant delays. As such any changes in policy that may affect consumer experience are of significant concern to us.

Question Responses:

Question 1: [Do] you agree with the Government's proposals in relation to User supplier to non-User supplier churn, in particular: The proposed removal of requirements for the DCC to provide a NGI which would have enabled non-User Suppliers to use this service to place their SMKI certificates on DCC enrolled Smart Metering Systems. In so doing, the outgoing User supplier's SMKI credentials will remain on the device until churned to a User supplier?

Citizens Advice is satisfied that the reasons set out in the consultation for not commissioning the gateway are sound. In particular, that suppliers already have obligations not to access consumers' smart meter data where they are not the eligible user, and that the relatively small window for meter churn from DCC users to non-DCC users makes it likely that this problem will be constricted enough not to justify a relatively large workaround cost.

However, in order to ensure suppliers follow their aforementioned Data Protection Act obligations and do not harvest meter data when are not permitted to, we suggest DECC engages with them to ensure they fully understand their responsibilities. It may also be appropriate to ask Ofgem to engage parties on this matter, to ensure practice is in line with obligations. Strong penalties should be levelled on transgressors. We understand there may be very specific circumstances under which an old supplier is permitted to act on information they receive from a

meter no longer in their portfolio, such as a tamper alert, such instances should be clearly set out and consulted on in advance.

Whilst not an issue associated with the gateway per se, customers in possession of these meters will lose smart functionality for the interim period between leaving their old supplier and their new supplier becoming a DCC user. As per other circumstances in which this is the case, we want the new supplier to clearly communicate this with consumers ahead of their switch, so that they can make a fully informed decision about whether to do so.

Finally, we are somewhat concerned that a DCC solution which was expected to be low cost did not match that expectation, and would very much hope this is a one-off rather than regular occurrence. If more fundamental changes to smart meter infrastructure is to be commissioned, it would concern us if the cost were similarly above DECC's expectations.