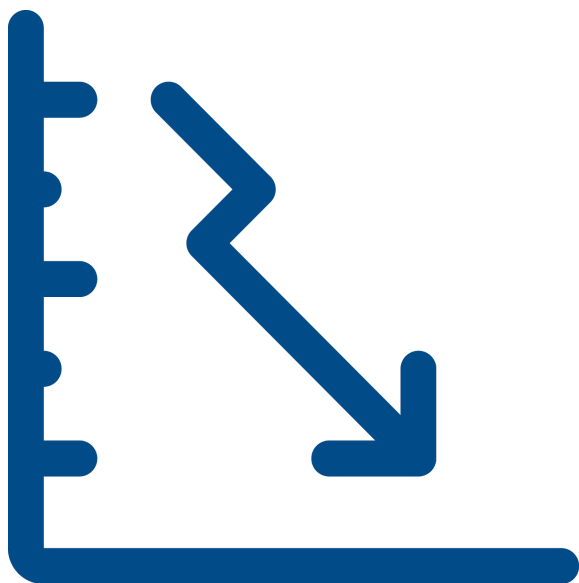


False Economy

Missed opportunities and failures
in the 'time of use' tariff market



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Summary

Time of use (ToU) tariffs are back on the radars of energy policy makers because of the smart meter rollout and the opportunity it presents. But these tariffs aren't new. Customers on Economy 7 and restricted meter tariffs have been buying electricity at peak and off peak rates for decades. We refer to these types of tariffs as 'Legacy' Time of Use (LToU) tariffs throughout the report.

Our [previous research](#) into the LToU market found significant evidence of poor consumer experience and detriment. Six years on and we have found no meaningful improvement.

This research highlights areas where suppliers and the regulator, now need to do more to address the longstanding problems we have identified. It also demonstrates that learning lessons from the LToU market could inform better experiences for future consumers in the 'Smart' Time of Use (SToU) market.

Introduction

The UK energy market is changing. New technologies and services are creating opportunities to reduce costs and improve consumer experiences. However, some consumers in more niche segments of the legacy market, continue to struggle with the unintended consequences of yesterday's innovations. There is a risk that these households may be left behind in the move to a smarter, more dynamic market. There is also a risk that we fail to learn the lessons from their poor experiences and so fail to address problems for future consumers.

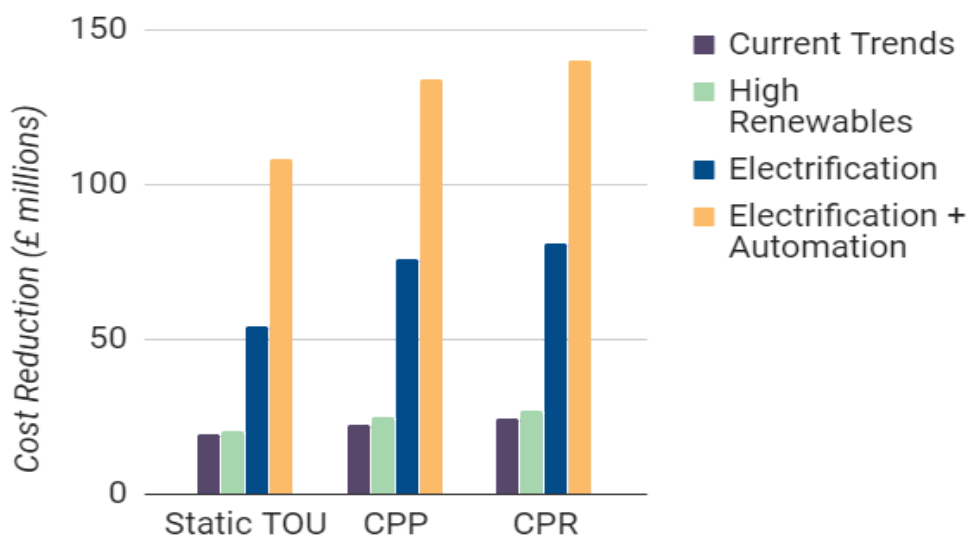
One such area is ToU tariffs. These are pricing plans that encourage consumers to use electricity at times when it is available more cheaply. In the future, such tariffs could help support a more flexible and sustainable electricity system, but in the past they have solely been used to help networks manage demand at peak times.

With the rollout of smart meters, consumer organisations, Ofgem and the government are anticipating a significant increase in numbers and types of

smart Time of Use tariffs. For example, BEIS' analysis¹ assumes a widespread take up of 'static'² ToU tariffs during the 2020s. It suggests it may increase from 20% in 2020 by 1% per year to 30% in 2030. These tariffs could play an important role in managing demand, by encouraging consumers to switch their usage away from peak times.

However, older forms of ToU tariffs - such as Economy 7, Economy 10, and Dynamic Teleswitching (DTS) tariffs - have been in use for decades. Whilst the technologies involved are less sophisticated than smart meters, the desired outcomes (shifting demand from peak times), and requirements of consumers (responding to price signals) are essentially the same. In DTS, we also have a less sophisticated example of automated control of energy consumption.

Citizens Advice recently published [research into the value of time of use tariffs](#) to the energy system as whole. We found that consumers are interested in ToU tariffs, but that in properties without electric heating and/or electric vehicles cars the value of ToU tariffs to the system is modest. We also found that real time pricing could provide much more value when combined with automated controls.



3

¹ Department for Business Energy and Industrial Strategy, Smart Meter Rollout Cost-Benefit Analysis (2016) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/567167/OFFSEN_2016_smart_meters_cost-benefit-update_Part_I_FINAL_VERSION.PDF

² i.e. ToU tariffs which are fixed, as opposed to more sophisticated dynamic ToU tariffs expected to emerge in future. This distinction is not relevant to this research.

³ Static ToU - Static time of use tariff; CPP - Critical peak pricing; CPR - Critical peak rebate

In that research, we concluded that policymakers should continue building the infrastructure to enable ToU tariffs, for example by rolling out smart meters, but not directly encourage consumers to switch to them yet. They should also prioritise simpler ToU tariff designs and give consumers information to make choices that are right for them.

In 2012, our predecessor organisation Consumer Focus published '[From Devotees to Disengaged](#)', which explored the issues faced by ToU consumers, those using restricted or unconventional meter systems and associated heating systems. We found a number of issues facing this particular segment of energy consumers, including problems with switching, information provision and understanding heating systems.

Opportunities to address the problems we identified, for example in Ofgem's Retail Market Review, were subsequently missed. This review introduced a number of behavioural prompts and changes, none of which were explicitly tailored to the different needs of ToU consumers. One potential positive change was the CMA's remedy introducing the right to switch for restricted meter consumers⁴, which took effect in September 2017.

Six years on, Citizens Advice wants to look at this market again. If SToU tariffs are to be a big part of the future energy retail market, it's important to learn from how well they have or haven't worked for consumers on older ToU tariffs.

Consumers' experience of poor information, and the resulting misunderstandings about their tariff should be a cautionary tale for the smart meter rollout and smart ToU. Smart meters will not deliver benefits to ToU consumers unless the lessons of the legacy market are learned and additional effort is made across industry.

LToU consumers' particular needs, have not been given significant priority in wider market reforms. Despite some efforts by suppliers, we found there had been little real progress on the issue these consumers faced since 2012. There is a real risk that up to 14% of households⁵ could be left behind as the market moves on.

⁴ This included LToU consumers other than those on Economy 7 tariffs - where a choice of tariffs was deemed to be adequately available.

⁵ BEIS, 2015, [Variation in Tariff types and energy bills](#)

Recommendations

Suppliers should:



Regularly provide their customers with clear, accessible, and up to date information on peak times and rates



Ensure marketing materials provide clear comparisons between off peak / peak rates and flat rate tariffs



Check to ensure smart meters will work effectively with older heating systems such as storage heaters, before switching customers to smart time of use tariffs



Set out how they will deliver the outcomes required by Ofgem's new principles on consumer communications for legacy Time of Use customers specifically

Ofgem should:



Have particular regard to legacy Time of Use consumers in monitoring the impact of the current consumer comms reforms



Work with BEIS to ensure suppliers take a consistent approach to meter replacement, especially in relation to the smart rollout. There should be particular regard to the approach taken for consumers, where there may be costly barriers to having a smart meter installed.



Consider the needs of legacy Time of Use consumers within any future reform of Informed Choices

Methodology

We commissioned Ipsos MORI to undertake quantitative interviews with 502 LToU consumers as part of their regular omnibus survey. The questionnaire was based in part on our 2012 questionnaire⁶.

Ipsos MORI also conducted depth follow up interviews with 22 of the omnibus respondents to understand their behaviour, decision making and any problems they had experienced in more detail.

Terms and abbreviations used in this report

Restricted meter (RM): A meter that allows for electricity customers to be charged lower rates for electricity used at times with reduced overall demand. Some restricted meters can have multiple off-peak timings, and some households have separate physical meters for different times of use.

Time of Use (ToU): A Time of Use tariff is any tariff which charges a lower rate for electricity used at times with reduced overall demand.

Smart Time of Use (SToU): Any time of use tariff supported by data or information from a smart meter.

Legacy Time of Use (LToU): Used here to refer to any time of use tariff which isn't a 'smart' Time of Use tariff, specifically those listed below.

Economy 7 (E7): The most common type of LToU tariff, which offers 7 hours of off peak electricity per day.

Economy 10 (E10): Second most common LToU tariff, which offers 10 hours of off peak electricity per day. Other similar tariffs include Economy 8, Economy 12 etc.

Dynamic Teleswitching (DTS): A metering arrangement, which is mostly found in Scotland and the Midlands, that allows for the remote control of customers' heating load by suppliers. DTS meters have specially designed Time of Use tariff arrangements associated with them.

All of these tariffs are marketed under a wide range of different brand names.

⁶Most questions were retained, with some additional ones included too.

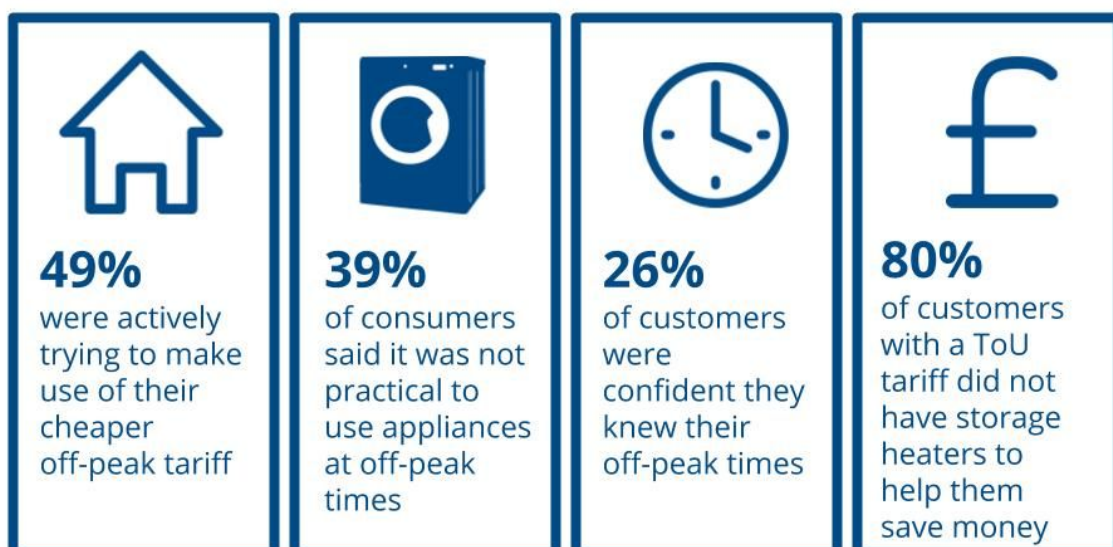
Are LToU consumers able to benefit from their tariff and metering arrangements?

Most households are on a standard flat rate tariff. It means they can switch appliances on and off and heat their home at any point in time, without it costing more or less. Other households are on a ToU tariff, meaning the price they pay for their energy may change, depending on the time they are using it.

In theory, ToU consumers can pay less overall by using electricity at off peak times, or 'shifting their demand'. For them to be able to do this successfully, consumers must be able and willing.

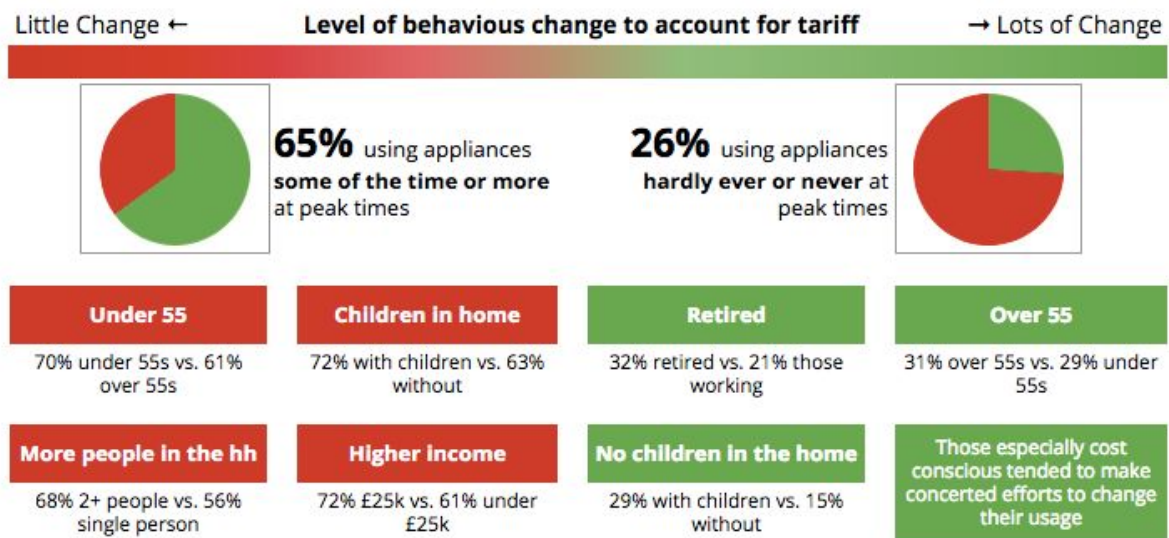
Some LToU households are more willing and/or able to shift demand than others

Our research found that only around half (49%) of consumers surveyed said they were actively trying to use electricity at off peak times to save money. This represents no real change since our 2012 survey where 50% answered yes to the same question.



Some consumers were more likely than others to successfully shift demand. However, those less likely to change behaviour included:

- consumers on high incomes, who were unconcerned about costs,
- younger households, particularly those with children, who were less able to use electricity differently at different times
- households with more people



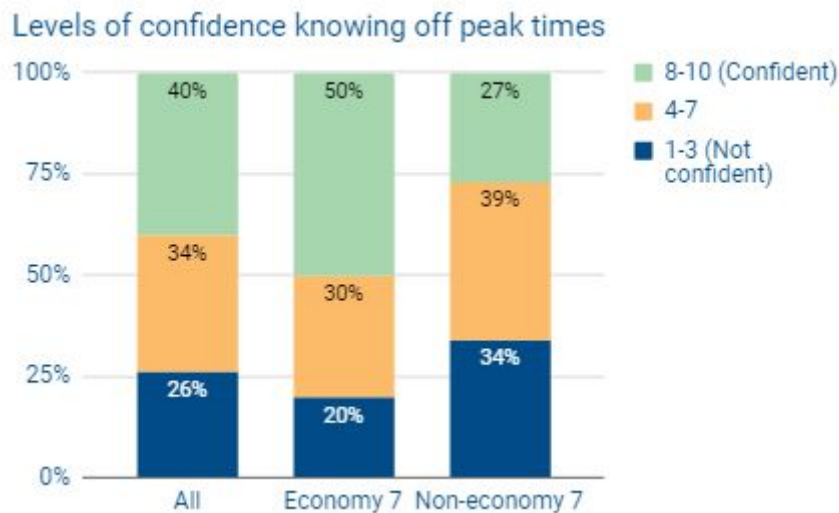
There were also simple, practical reasons why households wouldn't shift demand. Appliances like ovens clearly need to be used at certain times of the day, but washing machines - which could be used at any time - were often not put on overnight because of concerns about safety or noise. Two fifths (39%) of respondents said it was not practical for them to use appliances at off peak times, and a third (28%) said it wasn't practical for them to heat their property at off peak times.

Only one in five of the households surveyed had a storage heating system in their home, meaning 80% do not. These systems are specifically designed to use more electricity at off peak times. Heat is generally the largest contributor to annual energy bills, meaning a household without storage heaters is unlikely to be getting the most out of their ToU tariff.

Our findings suggest there are clear limits to how much LToU consumers are willing and able to change behaviour in the face of perceived issues of practicality or convenience. Marketing of ToU tariffs should help consumers make an informed choice about how realistic it is that they will be able to save money by changing behaviour.

Poor information provision means even motivated consumers can fail to benefit

The biggest area of concern for consumers was poor information about the details of their tariff. Most consumers understood the fundamentals of their ToU tariffs, but key details like when exactly the cheaper off peak rates were available were often not known. Even consumers who claimed to understand their tariff were sometimes found to be making assumptions about when cheap times were, rather than knowing for sure.



This could mean that some consumers who are making the effort to change behaviour are in fact not benefitting, as they may be using electricity at incorrect times.

Whilst around half of consumers claim to have received information on their tariff, probing found that few recalled the details of the information. There was an assumption that the information had 'probably' been provided at some point. Around a third of consumers said they had received no information, and had not asked for it⁷.

Citizens Advice is aware, from discussions with suppliers and trade bodies, that carrying out a stock take of all their LToU tariffs can be a significant and challenging undertaking. In some cases suppliers themselves do not have detailed information about the meter and its settings for every one of their customers. They are therefore not able to accurately set out exactly when the cheaper hours are for all their customers.

⁷ The experiences of the Ipsos MORI research team during the implementation of this study serve to highlight the difficulties that LToU customers can face in finding clear information on their tariff, and therefore their ability to maximise the benefits of having this tariff. Considerable difficulties were encountered by the team identifying: off-peak tariff types from the tariff name; the timing of off-peak periods; and the off-peak and peak rates.

We do not underestimate this as a resource challenge, but this does not make the situation acceptable for consumers. It is clear that little priority has been given to making sure these consumers are proactively receiving the information needed to help them reduce their costs. If suppliers were serious about updating the information they hold, then routine meter reading visits would present an opportunity to do so.

For consumers who are motivated to change behaviour, the lack of reliable information puts them in a highly undesirable position. They may give up on efforts to adjust their usage, or may change behaviour in a way that inadvertently increases their costs. Smart meters and their associated in-home displays, if accepted, have the potential to address this to an extent. Consumers should receive live and historical information about their costs and usage.

However the information consumers receive must also enable them to plan usage, by setting out clearly what costs are charged at what times. Given that not all consumers will be equally able to shift their demand, STou products must be explicit about how they compare to a flat rate, and offer guidance to consumers to help them understand how well a ToU product may or may not fit their lifestyle. The alternative is to risk mis-selling of STou products, with consumers seeing their costs go up rather than down.

LToU consumers face additional barriers to switching

Our 2012 research found that LToU consumers faced additional barriers to switching, with restricted meter consumers in particular sometimes finding suppliers refusing to take them on as a customer.

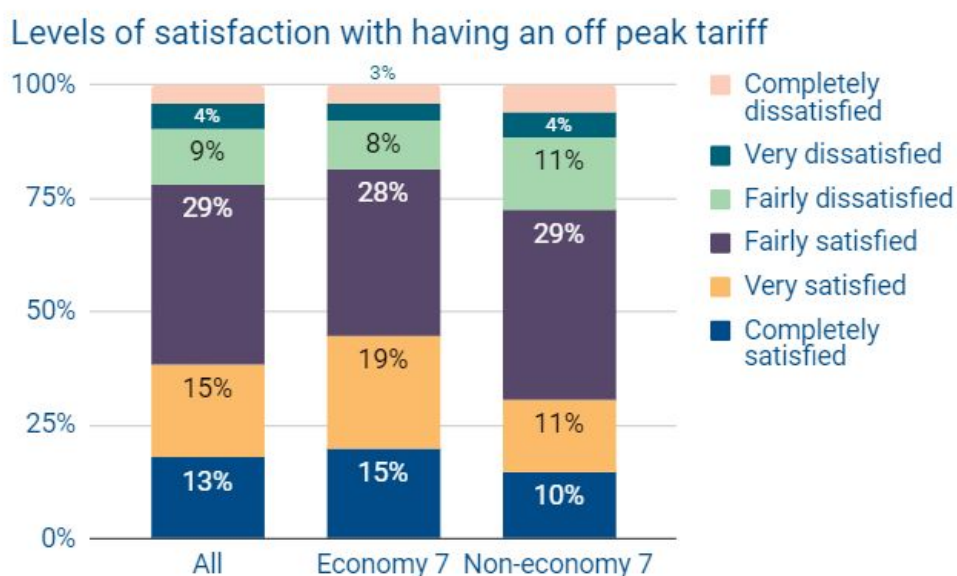
There have been two key changes since then. Firstly, the number of suppliers in the market has more than trebled from around 20 in 2012 to around 70 today⁸.

Secondly, the CMA - following its energy market investigation - introduced a remedy for restricted meter consumers requiring any supplier to offer them a standard rate tariff. This ensured restricted meter consumers could switch to a new supplier, but did not guarantee they could retain their existing ToU and metering arrangements in doing so.

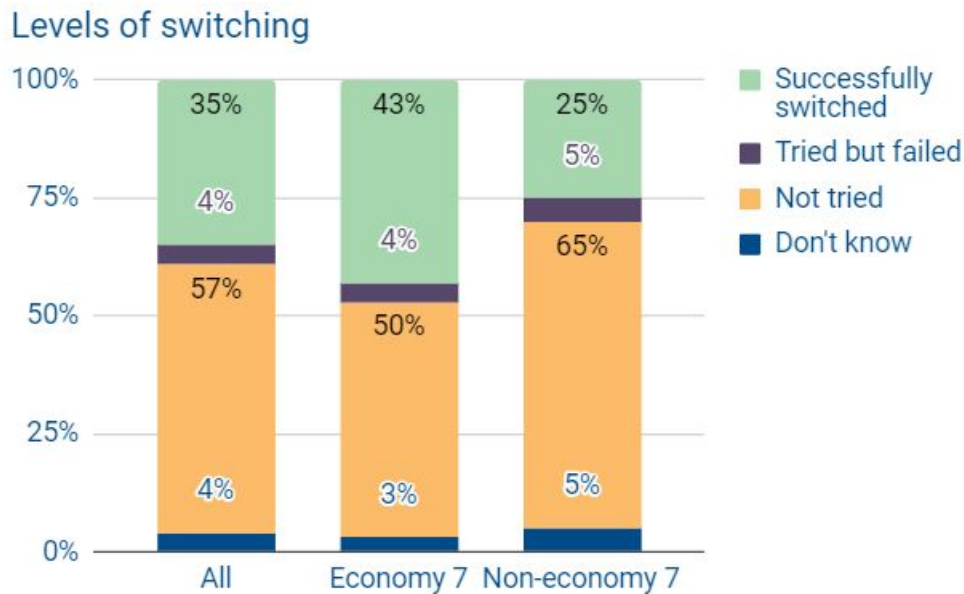
⁸ Ofgem - Number of active domestic suppliers by fuel type
<https://www.ofgem.gov.uk/data-portal/number-active-domestic-suppliers-fuel-type-gb>

Some LToU consumers had not made an active choice to be on a ToU tariff, but had inherited this arrangement when moving into a property which already had either storage heaters or a restricted metering arrangement. The historical challenges and barriers to switching can mean these consumers pay not just a loyalty penalty for not switching, but a complexity penalty if the market cannot accommodate them with an offer that meets their needs.

ToU consumers were generally satisfied with their tariff (57% of the total, with Economy 7 being more satisfied at 62%), although, as shown above, some of this satisfaction may arise from misunderstandings about how exactly the tariffs work. Those who had switched tended to have stuck with a ToU tariff, suggesting they had come to value the arrangement.



The general appetite for switching amongst all LToU customers was low, with over half (57%) having never tried. Economy 7 were more positive about switching, with 43% having successfully done so, but only 25% of non-Economy 7 customers had switched, with 65% having not tried. This suggests that the CMA's conclusion that a market remedy was needed for these customers was reasonable.



The reasons consumers gave for not wanting to switch - hassle, scepticism around savings, and general apathy - are broadly in line with those found in the general population of energy consumers. We have not found compelling evidence that LToU consumers differ significantly in their appetite to shop around.

However, LToU customers who had tried but failed to switch faced additional barriers compared to standard customers. These included:

- suppliers being unable or unwilling to serve them
- inability to find an attractive ToU deal
- being unable to use price comparison sites reliably
- being charged additional fees to replace meters

Consumer Service case study: Switching

Alice contacted us to say she had moved into a property with a restricted meter with two MPANs (Meter Point Administration Numbers - the unique number that enables suppliers to identify the exact meter they are supplying).

When Alice tried to switch to a new supplier, the company refused to take her on, saying that her meter was too old and should only have one MPAN. Both her current and desired supplier refused to replace the meter, saying that Alice would have to pay for this herself.

We also tried to establish whether restricted meter consumers were aware of the CMA remedy and their guaranteed right to switch to a single rate tariff with their current supplier or a new supplier. In practice most consumers (57%)

correctly identified that they had the right to switch, but no respondents said they were specifically aware of their new right to switch to a single rate tariff. This suggests that consumers had simply made an assumption that they already had the right to switch, rather than attributing that right to the CMA's intervention.

On being told that a guaranteed right to switch was actually a new development, and asked if they would be interested in taking advantage of their new rights, most (53%) LToU consumers said they were not interested in switching. Of those who were newly interested, around 18% expressed a wish to remain on a ToU tariff, with 15% preferring a flat rate tariff.

This suggests that, the CMA remedy will not, in itself, prove decisive in motivating increased switching, but will need to be complemented by specific price comparison guidance for consumers with restricted meters. We have also seen little evidence of suppliers targeting restricted meter consumers with acquisition deals, meaning choice remains low for some. Suppliers could do more to attract restricted meter customers. However, the higher cost to serve may restrict the willingness of suppliers to offer such tariffs. These consumers are therefore likely to remain excluded from the benefits of a competitive energy market. Their experiences and prices should therefore remain a priority for Ofgem.

Ahead of the CMA remedy taking effect, Citizens Advice published a [good practice guide](#) highlighting the existing good practice around restricted metering, as well as areas for improvement. We made the following recommendations

1. Provide additional customer service support for restricted meter customers.
2. Give customers clear and timely information about the remedy.
3. Apply the [Informed Choices](#) principles.
4. Ensure customers have a choice of tariffs.
5. Accurately bill new restricted meter customers

Dynamic Teleswitching consumers face additional challenges

Dynamic Teleswitching (DTS) is a specific metering arrangement which is mostly found in properties in Scotland and the Midlands. DTS consumers can have particularly complex setups, sometimes with multiple meters for different

appliances and their storage heating system being controlled by their network company to balance demand.

In cases where DTS systems were installed at the time the property was built, it can be particularly challenging and disruptive to have this system replaced with a modern, or smart, metering system. Some DTS consumers interviewed told us they felt trapped on their system because of the high cost of replacing it, and the uncertainty of whether that investment would pay off in the long term. DTS meters are also often commonly found in social housing or rental properties, which can tie the bill payer in further to the system if landlords are unwilling to fund or agree to the change.

As well as issues of choice, some DTS consumers also found the lack of control over their heating to be a problem. Many DTS properties are poorly insulated, with ageing heating systems - meaning the occupants weren't even getting an acceptable level of heat for what they paid. Some who weren't able to be flexible with their lifestyle found the timings on their teleswitched storage heaters were not convenient for them.

Again, information about the timing of cheap and peak times was not widely available. We appreciate the 'dynamic' nature of these tariffs means that peak times and rates could vary day by day, however in practice we are not sure how much real variation there is with DTS pricing over time. DTS consumers could be given more proactive information about the likely peak times they should expect, as well as more detailed information about variation to peak times using SMS messaging or online alerts. Whilst not perfect, this would represent a substantial improvement over the minimal information currently available.

Some consumers reported having to figure out for themselves when the transition to a different rate happened by, for example, observing a red light coming on their meter. They then assumed this meant the cheap rate had begun, but this was not based on official information from their supplier or DNO.

Similar to other LToU consumers, DTS consumers were positive about the idea of a ToU tariff, and did not express a desire to switch to a single rate tariff. However DTS consumers who had previously tried to switch had experienced further challenges, in some cases more acute versions of general LToU issues - such as being unable to make like for like comparisons on price comparison sites.

One consumer in particular who contacted a new supplier about switching was told they would have to pay a standing charge on all four of their existing meters. This ultimately meant the switch would not have been cost effective and they were left dissatisfied. Another consumer was facing charges of around £200 to have their meter replaced, which again was prohibitive for them.

The DTS consumers we spoke to were not benefiting from competition on price or service from suppliers. Some of the consumers interviewed had attempted to switch after the introduction of the CMA's restricted meter remedy (though apparently not in response to it - see above) suggesting, again, that the remedy alone may not be sufficient to drive competition for these consumers.

Consumer Service case study: DTS

Bob, a consumer on a Dynamic Teleswitching tariff, contacted us. He explained that his supply was controlled by a satellite appliance in their cupboard, and had been told that because of this 'dated' equipment, he wasn't able to switch suppliers. Bob had ultimately chosen to install oil heaters himself, as he was fed up with the heating system he had in place before.

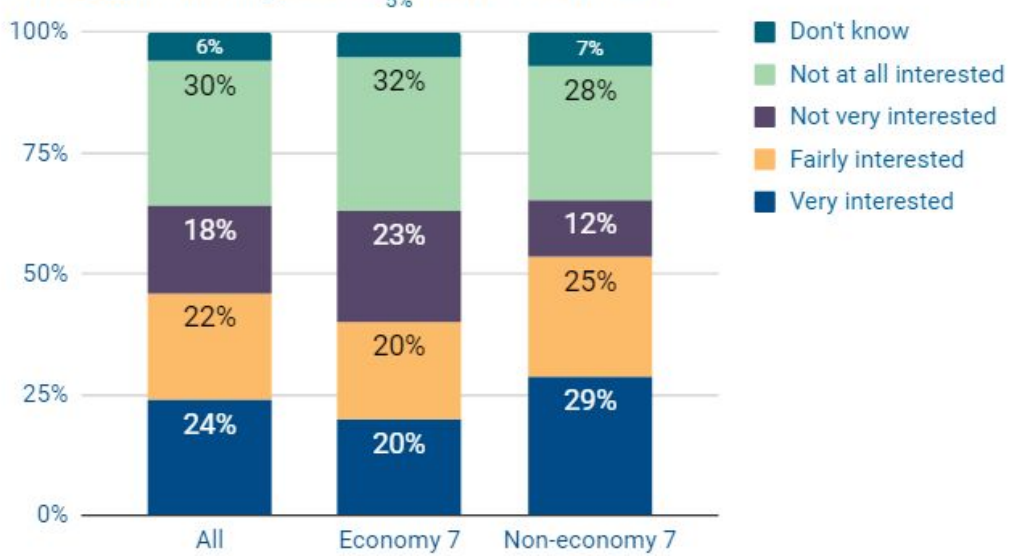
LToU consumers' views on smart meters

Smart meters have the potential to address some of the technical challenges associated with LToU tariffs, and restricted meters. We would expect better, quicker, and more up to date information about costs to be readily available as well as switching supplier or tariff to be simpler and quicker.

We anticipate that STou tariffs will be a feature of the future energy market, and, as noted above, government and the regulator should be mindful of the experiences of LToU consumers in monitoring sales practices.

Our research considered how LToU consumers felt about the prospect of receiving a smart meter or a smart ToU tariff.

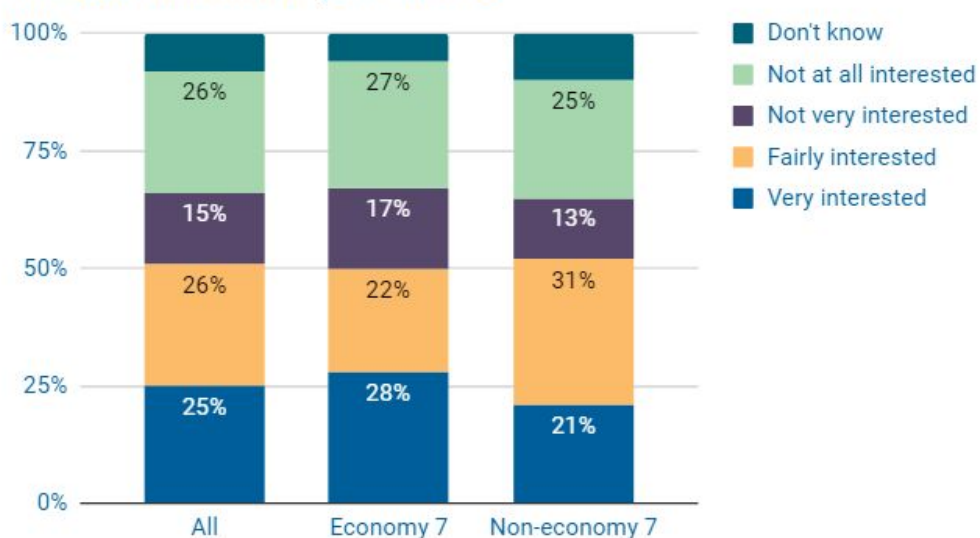
Interest in having a smart meter installed



Interest in having a smart meter was fairly high, with 46% of respondents expressing an interest. Interest was noticeably higher amongst non-Economy 7 consumers at 54%, which could be explained by higher levels of dissatisfaction with their current arrangement.

Interest in having a smart meter changes when LToU consumers are presented with the idea of a SToU tariff.

Interest in smart off peak tariffs



This represents a 10% increase in having a smart meter among Economy 7 consumers, but a slight drop of 2% amongst other LToU consumers. However, during follow-up interviews, some consumers assumed having a smart meter

would lead to them losing their off-peak rate, and said they would be more interested if they were able to have a SToU tariff.

This could be good news for uptake of SToU tariffs, if longstanding ToU consumers are interested in continuing to buy electricity in this way. However it will be important to ensure consumers properly understand their tariff, and aren't making false assumptions about the overall cost of their peak and off peak usage.

DTS consumers, again, faced additional barriers around smart meters - with one being told they would have to wait until towards the end of the rollout to receive one, causing disappointment and frustration.

What our Consumer Service evidence tells us

In addition to the original research we conducted, we reviewed our own data on contacts to the Citizens Advice Consumer Service regarding Economy 7, restricted metering and other LToU issues. We looked at a sample of Consumer Service contacts between September 2017 and April 2018 where key terms ('storage heaters', 'ToU', 'Economy 7' etc) were mentioned. We did not review every case identified in detail, and so the cases mentioned should be taken as indicative of the issues LToU consumers contact us about, but not as representative of our own advice trends.

Consumers were contacting us with a number of issues, including:

- Trying to switch from Economy 7 to a single rate tariff but being unable to
- Moving into new property with restricted meters installed, and finding their supplier unwilling to replace them
- Having a smart meter installed without their knowledge, and finding that it was not compatible with their ToU tariff
- Technical problems when switching from ToU tariffs to single rate tariffs - such as new suppliers being unable to accommodate multiple MPAN (Meter Point Administration Numbers)
- Customers on LToU tariffs having electricity bills that appear too high, but not understanding why - suggesting they may need information on shifting demand, or that single rate might be more appropriate for their needs
- LToU meters being replaced and subsequently not being compatible with the consumer's storage heaters

- One consumer whose cheaper night rate meter wasn't working, found he was being charged exclusively on the more expensive day rate

Out of the over 350 cases reviewed, 33% had been referred to our Extra Help Unit.⁹ This suggests that a high proportion of the LToU consumers who come to us for help are also vulnerable, either because of their personal circumstances or the complexity of the issue. They may therefore be particularly at risk from increased costs, or inability to heat their homes.

Case study: poor practice

Through evidence gathered by the Citizens Advice Consumer Service and Extra Help Unit we learned of a particularly poor approach to dealing with consumers on complex legacy metering arrangements.

In June 2017, Citizens Advice became aware that one large supplier had been rolling out a communications campaign to its customers on restricted meters. The company said that it would be replacing all of these meters, with the customer required to choose between a new Economy 7, Economy 10 or single rate meter. Its rationale was that these electricity meters were becoming obsolete, and replacement meters were no longer be available.

The supplier ensured that inbound contacts from customers in response to the letter were directed to a specialised team, who were able to talk consumers through their options.

If the customer failed to respond to the letter, the supplier withdrew their restricted meter tariff and started billing them on single rate Standard Variable Tariffs.

Many of these households were facing an immediate increase in costs, with the worst affected households facing up to a £800 increase in their annual bill. Other households that agreed to a meter exchange experienced other problems, due to how their original restricted meter worked with their heating system. One household lost hot water after the meter exchange. Many of the consumers who contacted us were living in social housing and had low incomes.

⁹ Between April 2017 to March 2018, the consumer service referred an average of 20.7% of all household energy cases to the Extra Help Unit.

The consumers who contacted the Citizens Advice consumer service and Extra Help Unit felt that the supplier's letters did not provide them with sufficient help and support to help them manage the transition to a significantly more expensive tariff. In addition, the supplier did not send out more personalised letters to consumers who were known to have some form of vulnerability.

We worked with the supplier and Ofgem, persuading them to pause their meter replacement campaign until they were able to provide appropriate support to all affected households.

As a result the supplier:

- Recontacted all their customers who had been rolled onto a single unit rate Standard Variable Tariff to explain what had happened and offer them support
- Suspended billing on the account, in some cases, so the customers didn't get a bill until the conversation had occurred
- Offered pay protection to match their old tariff prices
- Wiped debts for some customers to help them with the financial transition to the new tariff arrangement
- Improved the letters it sent to the remaining customers to make them easier to understand

This case study demonstrates the importance of providing tailored solutions to LToU consumers. These arrangements are popular with consumers, and could be working well for them with the right additional support.

Conclusions

This research, and our previous report on the [value of time of use tariffs](#), suggested ToU tariffs are popular amongst consumers who currently use them, and they will have interest from potential consumers in the future. However there has been no serious action to address the longstanding issues faced by LToU customers, and therefore a danger that the same problems will emerge in the SToU market.

Suppliers and the regulator need to give a higher priority to addressing issues in the legacy market now, and not simply wait for the smart meter rollout to make the problem go away. It is also clear that without learning the lessons of this research - particularly around information provision - we may find SToU consumers experiencing problems that feel frustratingly familiar, especially if it is not easy to automate behaviour through smart appliances.

This in turn could mean the potential benefits to the electricity system as a whole may also not be realised.

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