

# **Citizens Advice Consumer Work Plan 2023/24: Summary of responses**



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# Introduction

This year we received **30** responses to our draft work plan. They were submitted by a range of stakeholders including key regulators, industry bodies, charities, interest groups and unions.

We welcome all the feedback we have received as an important way of developing our work. We have carefully assessed the feedback and made changes to our final work plan accordingly. This document summarises the feedback we received for each project and any changes made to the work plan.

## EDI

### **Consumer Council for Water (CCW)**

CCW support of our work on equality, diversity and inclusion and would like to hear more about our EDI dashboard. They said that sharing data on water could make it possible to see a broader picture as people battle through the cost of living crisis.

### **Northern Gas Network (NGN)**

NGN is very supportive of our work on equality, diversity and inclusion (EDI) and feels we should consider particularly how we can promote our role in providing advice to marginalised groups including refugees, who may not be aware of our services. NGN also praised the cost of living dashboard which helps them understand consumer needs and inform their decision making for projects.

# 1. Making markets work for consumers

## 1.1. Improving the consumer experience in the energy market (energy)

*5 respondents commented on this project. All 5 responses were positive.*

### **Committee on Fuel Poverty**

The Committee asked how Citizens Advice can raise awareness of the Star Rating tool once switching in the market resumes

### **Scottish Power**

Scottish Power believes that Citizens Advice has correctly identified this as a key focus in our work plan this year.

### **Consumer Scotland**

Consumer Scotland welcomes our work in this area. They would like to examine how we can work together to help them develop their evidence base on key issues for consumers in Scotland.

### **Energy UK**

Energy UK said this is also an area they will be working on, both from the perspective of current market experience and compliance but also the role of market and regulatory reform in the medium term and how a competitive, innovative, consumer friendly market can best be achieved.

### **OZEV**

OZEV suggested that we should also include a point on our ongoing work with the government on building consumer confidence in the EV charging market and informing future market arrangements to reflect consumer needs.

## 1.2. Financing of home decarbonisation measures (energy)

*7 respondents commented on this project. 5 responses were positive and 2 were neutral*

### **Scottish Power**

Scottish Power are pleased that we will be doing research in this area. But, they note, that providing these services may fall outside the remit of energy suppliers.

### **Energy Saving Trust (EST)**

EST supports this work and have offered to share their insights and expertise, particularly around innovative models such as property based finance or energisproong.

### **Consumer Scotland**

Consumer Scotland supports this work. They believe there would be merit in widening the geographic coverage of our research to include Scotland, to learn lessons from support and advice services, and grant and loan schemes in Scotland.

### **Consumer Council for Water (CCW)**

CCW said they see opportunities to work with Citizens Advice on this and are keen to hear about our research with consumers to get a clear idea of consumers' needs for financing green home improvements.

### **Energy UK**

Energy UK has said this is an area that it will work in coordination with Citizens Advice to ensure positive consumer outcomes and accessibility.

### **Northern Gas Network (NGN)**

NGN recommended to support financing of home decarbonisation measures there needed to be a more consistent offer of Citizens Advice energy advice services geographically to help consumers to navigate home decarbonisation options. To support this they recommended that there must be access to appropriate training to ensure staff are equipped to provide advice in this area.

### **CMA**

The CMA shares Citizens Advice's concerns about the potential for poor practices in the energy efficiency market, including misleading claims about potential cost savings.

### 1.3. Continuing to support consumers through the cost of living crisis (consumer)

*5 respondents commented on this project. 4 responses were positive and 1 was neutral.*

#### **Consumer Scotland**

Consumer Scotland welcome the multi-sectoral approach to this work.

#### **Consumer Council for Water (CCW)**

CCW is in full support of Citizens Advice's planned work to highlight opportunities for companies in different sectors to provide assistance to people struggling with affordability, especially those in vulnerable circumstances.

#### **Energy UK**

Energy UK is keen to work together with Citizens Advice to campaign for continuing government support, while also helping suppliers to deliver it effectively.

#### **CMA**

The CMA agrees with Citizens Advice's focus on cross-cutting themes rather than specific markets. They note that the intelligence and insights provided by Citizens Advice will continue to be an important element of how the CMA identifies the key areas of detriment to focus their attention on.

#### **Fair By Design**

Fair By Design requested for Citizens Advice to provide some more detail on the proposed plans to help consumers retain essential insurance protections when their premiums have become unaffordable.

### 1.4. Learning from crises (consumer)

*3 respondents commented on this project and their responses were positive.*

#### **Scottish Power**

Scottish Power agrees with our work in this area, particularly on how consumers at risk of fuel poverty can be protected through a social tariff.

#### **Consumer Scotland**

Consumer Scotland welcome this work, particularly the long-term approach of learning from past interventions in different markets. They also said they would be interested in finding out more about our work on social tariffs as this progresses.

### **Energy UK**

Energy UK said this is a vital area of work. They are keen to work with Citizens Advice to influence government and regulatory thinking on how different consumers are treated under the price cap and promote the need for further support for those on low incomes, either through a social tariff or other targeted support.

## **1.5. Protecting and strengthening USO regulation (post)**

*7 respondents commented on this project. 4 responses were positive and 3 responses were neutral.*

### **Action with Communities in Rural England (ACRE)**

ACRE is in favour of Citizens Advice's project monitoring the postal USO. They would welcome evidence on the quality of service to rural residents.

### **The Communications Consumer Panel (CCP)**

The CCP shares Citizens Advice's concerns about protecting and strengthening the postal USO. They welcome Citizens Advice's commitment to protecting this vital service.

### **Consumer Council Northern Ireland (CCNI)**

CCNI supports the focus on the potential reduction of letter deliveries from 6 to 5 days a week. They agree with Citizens Advice that Royal Mail's elective safeplace scheme must not lead to detriment for consumers.

### **Consumer Scotland**

Consumer Scotland welcomes Citizens Advice's proposed work on protecting and strengthening USO regulation, and ensuring it remains affordable for consumers.

### **Department for Environment, Food and Rural Affairs (DEFRA)**

DEFRA are concerned about rural areas suffering a lesser service in comparison to urban areas. This would have a significant impact on small businesses and sole traders in rural areas. For DEFRA, a universal change to the USO would be more acceptable than a change that just impacts rural areas.

### **Royal Mail**

Royal Mail believe Citizens Advice's new research on the future of the USO could be a duplication of Royal Mail and Ofcom's research.

### **Rural Services Network (RSN)**

RSN agreed that it is important to continue to work on the postal USO. RSN would like to see more research on consumer needs in rural areas and the impact of the potential loss of Saturday deliveries.

## **1.6 Post affordability in a cost of living crisis (post)**

*5 respondents commented on this project. 4 responses were positive and 1 response was neutral.*

### **The Communications Consumer Panel (CCP)**

The CCP voiced their support for Citizens Advice's work on the second class price cap.

### **Consumer Council Northern Ireland (CCNI)**

CCNI are in favour of Citizens Advice's proposed work on affordability.

### **Consumer Scotland**

Consumer Scotland welcomes Citizen Advice's proposed work in relation to the price cap on second class postal services. They are pleased to work in partnership with Citizens Advice and CCNI on Ofcom's forthcoming review of the price-cap.

### **Keep Me Posted**

Keep Me Posted supports our work on the USO and late deliveries. They would like to see Citizens Advice research how consumers use paper bills and statements during the cost of living crisis.

### **Royal Mail**

Royal Mail encouraged Citizens Advice to consider whether there has been any research already carried out in this area to avoid duplication. They asked that any new research should focus on identifying those who face affordability issues. This would help policy interventions be targeted most effectively.



## 1.6. Holding Royal Mail accountable for delivering for consumers (post)

*5 respondents commented on this project. 3 responses were positive and 2 responses were neutral.*

### **The Communications Consumer Panel (CCP)**

The CCP are supportive of holding Royal Mail to account for quality of service failures.

### **Consumer Council Northern Ireland (CCNI)**

CCNI highlighted their support for our work. They are concerned about Royal Mail breaching their Quality of Service targets for the past three years. CCNI commented that consumers have no choice in the letters market as Royal Mail is a monopoly provider.

### **Department for Environment, Food and Rural Affairs (DEFRA)**

DEFRA are interested in analysis exploring whether certain areas have been disproportionately impacted by Royal Mail delays. They would like to know whether urban deliveries have been prioritised over rural areas.

### **Mail Competition Forum (MCF)**

The MCF voiced their support for Citizens Advice's work highlighting Royal Mail's quality of service. They suggested that in general Citizens Advice should avoid duplicating research commissioned by Ofcom.

### **Royal Mail**

Royal Mail stated they will continue to work with Citizens Advice to provide the best service for Royal Mail's customers.

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

*2 respondents commented on this project and their responses were positive.*

### **Committee on Fuel Poverty**

The Committee shares Citizens Advice's concerns about gaps in support for consumers to access energy efficiency. They asked if Citizens Advice is working in collaboration with other organisations to understand consumers' experiences.

## **Energy UK**

Energy UK is keen to work with Citizens Advice to continue to ensure the effective delivery of national energy efficiency programmes, to help consumers through the cost of living crisis.

## 1.8 Support for small businesses reliant on postal services (post)

*5 respondents commented on this project. 5 responses were positive.*

### **Apex Insight**

Apex Insight believes Citizens Advice's work is well-designed. They suggest that the research on small businesses should focus on companies that are highly dependent on parcels, not just small businesses as a whole.

### **Consumer Council Northern Ireland (CCNI)**

CCNI look forward to engaging with Citizens Advice on their small businesses project.

### **Consumer Scotland**

Consumer Scotland encouraged Citizens Advice's work on small businesses and postal services. They would like to see Citizens Advice sharing information on whether this research will be UK-wide and any future insights on the project.

### **Department for Environment, Food and Rural Affairs (DEFRA)**

DEFRA states their interest in this research project because there are more small businesses in rural areas.

### **Royal Mail**

Royal Mail expresses an interest in working with Citizens Advice when the outputs of the research on small businesses become available.

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

*1 respondent commented on this project and their response was positive.*

## **Energy UK**

Energy UK believe that while the many of the EV charging solutions exist, they are keen to ensure there is clarity over timelines and remaining gaps. They would like to work with Citizens Advice so that we can share learnings from our work on this area.

## **2. Better value infrastructure**

### **2.1. Fixing the gaps in the post office network (post)**

*9 respondents commented on this project. 7 responses were positive and 2 responses were neutral.*

#### **Action with Communities in Rural England (ACRE)**

ACRE states their approval for research into post office outreach services. They would appreciate evidence on the higher cost incurred for running services in rural areas and how to address these costs.

#### **Consumer Council Northern Ireland (CCNI)**

CCNI believe it is essential to share knowledge and insights on post office-related developments with Citizens Advice.

#### **Consumer Scotland**

Consumer Scotland are supportive of Citizens Advice's work ensuring that rural and remote communities have access to post office services.

#### **Department for Environment, Food and Rural Affairs (DEFRA)**

DEFRA welcomes this project as they are concerned about gaps in rural provision of post offices. DEFRA is aware of challenges in rural areas with temporary closures of post offices and part-time outreach services. They would find it useful to see an analysis of access to cash and banking services in rural communities.

#### **The National Federation of SubPostmasters (NFSP)**

The NFSP would like to know more about potential risks to the Post Office network over the next 5 years. They wish to understand the specific concerns of operators (such as CJ Langs and McColl's) to prevent future mass closures of Post Offices.

### **Plunkett Foundation**

The Plunkett Foundation is supportive of the focus on ensuring good service provision throughout the post office network, particularly in rural areas.

### **Royal Mail**

Royal Mail will continue to engage with Citizens Advice in ensuring that customers have the best access to postal services.

### **Rural Services Network**

RSN shares Citizens Advice's concern about the number of part time post offices. They believe the rural post office network may be struggling financially. RSN would welcome research that produces findings about rural residents and small businesses.

### **WHSmith**

WHSmith agrees with Citizens Advice's focus on the size of the post office network and understanding how customers access post offices. They believe franchises are struggling financially and many franchises will shut without support from Post Office Limited and the government.

## **2.2. Enhancing the consumer experience in the smart meter rollout (energy)**

*6 respondents commented on this project. 4 responses were positive and 2 were neutral.*

### **Committee on Fuel Poverty**

The Committee would like to know what Citizens Advice's position is on what can be learned from the smart meter rollout for those who struggle to pay their bills.

### **Scottish Power**

Scottish Power suggested that we should consider how our work can learn from their pilot of Accessible In Home Displays to inform how consumer experiences may be enhanced. They also asked us to consider how suppliers' smart meter rollout targets may impact on consumers' attitudes towards smart meters.

### **Energy Saving Trust (EST)**

EST said that this is a great project and necessary at the moment with the launch of the Demand Flexibility Service. They also highlighted the importance of advice in behaviour change and understanding of smart technologies, especially for those who are digitally excluded.

### **Consumer Scotland**

Consumer Scotland welcomes Citizens Advice's focus on smart meters and the transition to net zero. In particular they highlight the importance of experience of smart meters for rural communities and potential issues with Dynamic Teleswitched electric storage heaters. They are also said it would be useful to explore experiences of consumers using existing technologies.

### **UK Power Network (UKPN)**

UKPN welcome Citizens Advice work on making sure In Home Displays are accessible to disabled customers. They are also interested in our plans on making smart meters accessible to all consumers. However, they suggest that the benefits of smart meters are greatest in homes of more engaged energy consumers with smart-enabled appliances. While they also acknowledged the benefits of installing in households of vulnerable consumers, and would like to understand better about Citizens Advice position on prioritising in the smart meter rollout.

### **Energy UK**

Energy UK believe that smart meters are a critical enabler of low carbon technology being taken up by consumers, and are keen to see this infrastructure deliver for consumers and the energy system alike including and beyond the current rollout.

## **2.3. Framework for decommissioning gas networks in heat decarbonisation (energy)**

*5 respondents commented on this project. 4 responses were positive and 1 was neutral.*

### **Committee on Fuel Poverty**

The Committee said it would like to see more of Citizens Advice's work to assess options for any gas network decommissioning and how they will mitigate against further hardship for the fuel poor.

### **Energy Saving Trust (EST)**

EST support this work and believe it is an important area. They said it is vital to consider the marginal impact on those faced with struggling with the cost of living crisis, especially as gas has been used as a means of addressing fuel poverty. They also offered to support us in this area.

### **Consumer Scotland**

Consumer Scotland support this work and welcome the early consideration of the implications for consumers.

### **Northern Gas Network (NGN)**

NGN said it will continue to engage with us on their decarbonisation plans. They encouraged us to work closely with network operators to assess the best options for consumers. They also stressed that communication for people in vulnerable situations will be very important.

### **Energy UK**

Energy UK agree with the need for a strategic approach to give consumers and investors clarity. They also offered to coordinate input from gas generators and shippers with our work where they can.

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

*6 respondents commented on this project. 5 responses were positive and 1 was neutral.*

### **Scottish Power**

Scottish Power welcomes the opportunity for their networks businesses to engage with Citizens Advice on price controls. It also recommended the ESO itself should be assessed against its existing Ofgem determined review criteria, while being encouraged to develop balancing mechanism reforms and enable flexible market options.

### **Energy Saving Trust (EST)**

EST believes this is a vital area for decarbonisation to deliver the right infrastructure with minimum disruption at an appropriate cost for consumers.

### **Consumer Scotland**

Consumer Scotland agrees this is an important issue and welcomes the early consideration of the implications for consumers.

### **Electricity Northwest**

Electricity Northwest suggest Citizens Advice consider how it plans to respond and work with more the adaptive regulation necessary for the reopeners and mechanisms in ED2. They also noted that Electricity Distribution was not directly referred to but that it was highly likely to be impacted.

### **Northern Gas Network (NGN)**

NGN plans to work with us to inform their price control engagement and will ensure that the performance targets they develop are mindful of our insight and recommendations. They will also work with us to determine PNES repurposing spend for customers in vulnerable situations.

### **Energy UK**

Energy UK agree with our approach, and have offered to work with us to coordinate where appropriate to make sure that networks are using their spending allowances effectively to upgrade infrastructure and enable new connections across the network.

## **2.5. Putting communities at the heat of LAEPS (energy)**

*7 respondents commented on this project. 5 responses were positive and 2 were neutral.*

### **Committee on Fuel Poverty**

The Committee would like Citizens Advice to use this work to consider tackling fuel poverty alongside getting to net zero, as part of a just transition.

### **Energy Saving Trust (EST)**

Energy Saving Trust agree that this is an important area and offered to feed in their experience from their involvement in LAEPS in Scotland.

### **Consumer Scotland**

Consumer Scotland welcomes this work and suggested it would be valuable to extend the geographical coverage of the work to Scotland as well.

### **UK Power Networks (UKPN)**

UKPN would like to engage with Citizens Advice on their plans and experiences on

LAEPs. They highlighted the challenge of the lack of clarity on which networks are required to deliver the optimal supply of decarbonised heat in each local area.

### **Energy UK**

Energy UK said it is already working with Citizens Advice to share information on Local Area Energy Plans as this will be a critical part of the transition to Net Zero.

### **Northern Gas Network (NGN)**

NGN are keen for us to share our research with them once complete to inform their own approach and role in working with Local Authorities and LEPs to develop LAEPS across their network.

### **OZEV**

OZEV suggested we include a specific reference to EV charging infrastructure here to clarify that it is part of the wider infrastructure under consideration.

## 3. A fair deal for consumers in vulnerable circumstances

### 3.1. Exploring unequal outcomes in consumer markets (consumer)

*1 respondent commented on this project and it was positive.*

#### **Committee on Fuel Poverty**

The Committee looks forward to hearing more about Citizens Advice's findings and solutions to improve unequal outcomes in terms of price, service, and access to the market for energy consumers.



## 3.2. Ending post exclusion for millions of people (post)

*5 respondents commented on this project. 4 responses were positive and 1 response was neutral.*

### **Consumer Council Northern Ireland (CCNI)**

CCNI supports Citizens Advice's proposed activity. They look forward to engaging with Citizens Advice on the issue of post exclusion.

### **Consumer Scotland**

Consumer Scotland voices their support for Citizens Advice's project on post exclusion and look forward to working with Citizens Advice on this issue.

### **Friends, Families and Travellers (FFT)**

FFT are in favour of Citizens Advice's work on access to post.

### **Royal Mail**

Royal Mail are concerned that this project overlaps with other work and asks Citizens Advice to take a collaborative approach. Citizens Advice published a report on post exclusion in 2018 and Royal Mail asks that this is considered before commissioning new research.

### **Women's Aid**

Women's Aid are pleased to see Citizens Advice working on the issue of post exclusion, particularly as this affects survivors of domestic abuse.

## 3.3. Exploring how people with protected characteristics experience postal services (post)

*2 respondents commented on this project. 1 respondent was positive and 1 respondent was neutral.*

### **Consumer Council Northern Ireland (CCNI)**

CCNI agrees that this work is an important consumer priority. CCNI feel there is a need for consumer bodies to work together to ensure postal problems are adequately influenced by industry and the regulator.

### **Royal Mail**

Royal Mail asks Citizens Advice to consider other factors (such as socio-economic groups) before reaching conclusions on research, and prior to commissioning further research.

## **3.4. Helping people to manage energy debt (energy)**

*7 respondents commented on this project and all responses were positive.*

### **Scottish Power**

Scottish Power agree with this work and have offered to work collaboratively with Citizens Advice to examine potential solutions to increased energy debt

### **Energy Saving Trust (EST)**

EST support this work which has been essential during the cost of living crisis as many more people have been struggling to pay their bills.

### **Consumer Scotland**

Consumer Scotland support this work, and said they would welcome the opportunity for them to input and provide the perspective from Scottish consumers to the work.

### **Electricity Northwest**

Electricity Northwest agree that there are a number of immediate energy related issues that should be the primary focus, such as the fair operation of direct debits and a robust approach when a customer is moved to a prepayment meter.

### **Consumer Council for Water (CCW)**

CCW fully supports Citizens Advice work in this area, especially the focus on customer journeys for affordable payment plans. CCW would like to see the output of this research to gather best practice for the water sector .

### **Energy UK**

Energy UK said it is already in touch with us about our emerging debt work. They said their focus is on how debt is managed within the market in a way that both protects vulnerable consumers, keeps costs to minimum for all consumers and enables effective investment in the industry.

### **Northern Gas Network (NGN)**

NGN would like to engage with us on their plans to make funding available for customers in extreme debt.

## **3.5 Advocating for inclusive design in emerging business models (energy)**

*6 respondents commented on this project. 5 responses were positive and 1 was neutral.*

### **Committee on Fuel Poverty**

The Committee welcomes this work and encourages Citizens Advice to ensure that consumers in fuel poverty are explicitly included in solution design.

### **Scottish Power**

Scottish Power agree that this is an important area of work.

### **Energy Saving Trust (EST)**

EST believe this is valuable work to make sure that everyone can benefit from the heat transition.

### **Consumer Scotland**

Consumer Scotland welcome this research and are particularly interested in findings related to time of use tariffs.

### **Energy UK**

Energy UK said that they would be happy to coordinate where appropriate with Citizens Advice to ensure inclusive design is a consideration at all stages of business models. It said it will continue to work with Citizens Advice and build on previous work on consumer protections it has worked with us and the Association of Decentralised Energy on before.

### **OZEV**

OZEV highlighted that we could focus on the EV chargepoint grant for renters or people living in flats, recognising that they may face more barriers to installing charge points, and a planned government phone line for people experiencing difficulties using public charging facilities.

## 3.6 Improving outcomes for consumers during extreme weather events (energy)

*6 respondents commented on this project. 5 responses were positive and 1 neutral.*

### **ACRE**

Acre welcomes this work examining Ofgem's compensation methodology and how it can be improved to provide a fair level of compensation to those most affected by the disruption during extreme weather events.

### **Energy Saving Trust (EST)**

EST believe this is an important area and will be important to look at the way that Ofgem's methodology is being applied in these circumstances.

### **Consumer Scotland**

Consumer Scotland welcomes this work they also suggested extending it to learn from other sectors such as water.

### **UK Power Networks (UKPN)**

UKPN welcomes Citizens Advice's proposed work on the methodology for compensating consumers when there is disruption due to extreme weather events. They are particularly interested in our views on targeting those most in need, and how the timing of the payments should be conducted.

### **Consumer Council for Water**

CCW are fully supportive of Citizens Advice work in this area and are campaigning for similar Guaranteed Service Standards (GSS) in the sector. They suggest sharing thoughts and learnings on this work between the two sectors will be beneficial.

### **Northern Gas Network (NGN)**

NGN recommended that the work plan could be extended to include a review of the services provided during gas interruptions.

## 4. Protecting consumers in rapidly evolving markets

### 4.1. Tackling discrimination in consumer markets (consumer)

*0 respondents commented on this project.*

### 4.2. Delivering better design in digital markets (consumer)

*2 respondents commented on this project and both were positive.*

#### **CMA**

The CMA expressed strong support for the continuation of Citizens Advice's work on delivering better design in digital markets, noting that the "Tricks of the Trade" report has already been a valuable source of information and assistance to the CMA's online choice architecture team. They look forward to collaborating with Citizens Advice on research in this area going forward.

#### **Fair By Design**

Fair By Design noted the relevance for Citizens Advice's proposed work on improving digital design, of their [published guides](#), developed in collaboration with the Design Council and Money Advice Trust, on inclusive design in essential services markets.

### 4.3. Putting people at the heart of parcel delivery (post)

*5 respondents commented on this project. 4 responses were positive and 1 response was neutral.*

#### **Apex Insight**

Apex Insight largely agrees with Citizens Advice's point of view on the parcels market. Apex Insight believes that consumers should have more freedom on choosing a parcel carrier and there should be regulation of parcel shop and locker networks. They would like Citizens Advice to update their reference to Ofcom's 2020/21 parcel volume data.

### **Consumer Council Northern Ireland (CCNI)**

CCNI welcomes Citizens Advice's work on parcels. For CCNI, it is important to highlight issues such as parcel surcharging in Northern Ireland and the impact of EU Exit.

### **DPD**

DPD requests that Citizens Advice includes an updated reference to Ofcom's parcel volume data from 2020/21.

### **Doddle**

Doddle is interested in seeing the results of Citizens Advice's work on parcels. They would like Citizens Advice to explore the problems that can sometimes occur when consumers' parcels are left in 'safe places.'

### **Mail Competition Forum (MCF)**

MCF describes Citizens Advice's post projects as interesting. They would like to see Citizens Advice explore how consumers might view increased parcel delivery charges if companies switched to zero-carbon transport. They would also favour Citizens Advice examining how consumers view pick up and drop off options (PUDOs).

## **4.4. Protecting consumers in the retrofit market**

*6 respondents commented on this project. 5 responses were positive and 1 was neutral.*

### **Scottish Power**

Scottish Power support this area of work especially as demand for energy efficiency and low carbon technologies has resulted in an increase in rogue traders and misrepresentation.

### **Energy Savings Trust (EST)**

EST believe this is a vital area to make sure that consumers have confidence in the retrofit market. They are interested in hearing how this project can inform their own work in this area.

### **Consumer Scotland**

Consumer Scotland welcomes this research and also suggested extending the research to cover Scotland.

### **Energy UK**

Energy UK are concerned about the increasing numbers of scams in this area and are keen to work with Citizens Advice to help address this to deliver positive outcomes for consumers.

#### **Northern Gas Network (NGN)**

NGN welcomed this area as a really important area of work, and a difficult area for consumers to navigate. They also highlighted that this is an area that they have heard there has been an increase in scams since the beginning of the cost of living crisis.

#### **OZEV**

OZEV suggested that we highlight the voluntary code of practice developed with EVET and Citizens Advice work to help progress the complaints handling processes.

### **4.5. Regulatory reform in energy (energy)**

*6 respondents commented on this project. 5 responses were positive and 1 neutral.*

#### **Committee on Fuel Poverty**

The Committee believes improvements in regulation and service delivery for vulnerable and hard to reach consumers could transform service culture and delivery more widely. It also believes that alongside retail market reform it will be important to consider how to support fuel poor and vulnerable households for Winter 23/24. While the Committee recognises Citizens Advice's role in representing all consumers it encourages Citizens Advice to particularly focus on fuel poor households.

#### **Scottish Power**

Scottish Power said that they believe that Ofgem's new regulations will help stabilise the market, but after the Energy Price Guarantee ends in March 2024 there will be a need for more robust price protections and regulatory reform.

#### **Energy Saving Trust (EST)**

EST believe this is an important area of work, and believe it will be important to consider how regulatory reform can drive the low carbon transition.

#### **Consumer Scotland**

Consumer Scotland welcomes this work.

### **Electricity Northwest**

Electricity Northwest suggested that we make a more explicit reference to planned work on social tariffs and how this will be fed into Ofgem, Government and other stakeholders.

### **Energy UK**

Energy UK said that this is also a focus for them throughout this year. They said that longer-term consumer outcomes need to be put at the core of Ofgem delivery.

## **4.6. Ensuring that REMA delivers good outcomes for all consumers (energy)**

*5 respondents commented on this project. 5 responses were positive.*

### **Scottish Power**

Scottish Power believe that Citizens Advice will have an important role as part of REMA to make sure that consumer impacts are recognised appropriately.

### **Energy Saving Trust (EST)**

EST agree that this an important area and believe it will be important to consider what parts of REMA can be fast-tracked, amidst the energy crisis, for example how cheaper renewable wholesale costs can help drive the uptake of electrical heating.

### **Consumer Scotland**

Consumer Scotland agree that there is a need for better outcomes for consumers in the retail market, and that wholesale market decisions will impact this. They welcome opportunities to work with Citizens Advice to exchange experiences and learnings.

### **UK Power Networks**

UKPN said that they are pleased to see that we are working on REMA. They are concerned about the potential impact of local marginal pricing on consumers, which they say could lead to higher prices for electricity for consumers. They believe a strong consumer voice to demand evidence from Government on the consumer impacts of change will help to ensure that any reform is carefully thought through.

### **Energy UK**



Energy UK believes that REMA can lead to better outcomes for consumers and help progress to Net zero. They would like to work with Citizens Advice to help push for fast practical reforms.

## 4.7. Explore the benefits case of hydrogen for heating (energy)

*6 respondents commented on this project. 5 responses were positive and 1 neutral.*

### **Scottish Power**

Scottish Power welcome Citizens Advice's work in this area.

### **Energy Saving Trust (EST)**

EST said that this work will be valuable in shaping the right protections and regulatory regime for hydrogen for heating.

### **Consumer Scotland**

Consumer Scotland said that it would be helpful if our research could take account of both possible levels of hydrogen generation and potential competing uses, as well as how much this will cost consumers.

### **Energy UK**

Energy UK welcomes this work and said that scrutiny on heat pumps and hydrogen for heating from Citizens Advice is critical. They are concerned with the potential of mis-selling and confusing messaging making it hard for consumers to know what to do when making decisions in their home.

### **Northern Gas Network (NGN)**

NGN welcomes this project being in our work plan and will work closely to support with us as more research becomes available.

### **Electricity Northwest**

Electricity Northwest recommended that the plan should ensure there is a piece of work on the transition to hydrogen. The work should look at the impacts on consumers.

## 4.8. Understanding the wider system benefits of energy efficiency (energy)

*5 respondents commented on this project. 4 responses were positive and 1 neutral.*

### **Energy Saving Trust (EST)**

EST believe this work will be valuable to quantify the wider system benefits of energy efficiency, where evidence is not currently clear.

### **Consumer Scotland**

Consumer Scotland welcomes this research and its role in providing evidence for network operators to invest in demand reduction projects. They suggested that we widen the research to include small scale batteries and modern storage heating technologies as well.

### **UK Power Networks (UKPN)**

UKPN welcomes Citizens Advice's work on the impact of energy efficiency on networks.

### **Energy UK**

Energy UK said that they are keen to ensure consumers get accurate info on the options and on the impacts of measures installed which requires better data and better delivery of advice from the government.

### **OZEV**

OZEV suggested that we highlight the voluntary code of practice developed with EVET and Citizens Advice work to help progress the complaints handling processes.

## 5. Index of responses

Apex Insight  
The Communications Consumer Panel (CCP)  
The Competition and Markets Authority (CMA)  
Consumer Council Northern Ireland (CCNI)  
Consumer Council for Water (CCW)  
Consumer Scotland  
Committee on Fuel Poverty  
Department for Environment, Food and Rural Affairs (DEFRA)  
Doddle  
DPD  
Electricity Northwest  
Energy UK  
Energy Systems Catapult  
Energy Saving Trust  
Fair By Design  
Friends, Families and Travellers (FFT)  
Keep Me Posted  
Laura Sandys  
Mail Competition Forum (MCF)  
Northern Gas Network (NGN)  
Office for Zero Emissions Vehicles (OZEV)  
The National Federation of SubPostmasters (NFSP)  
Thermal Storage UK  
Plunkett Foundation  
Royal Mail  
Rural Services Network (RSN)  
Scottish Power  
UK Power Networks (UKPN)  
WHSmith  
Women's Aid