

Heat networks regulation - consumer protection

Informing secondary
legislation and
authorisation conditions.



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Introduction

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.

Citizens Advice is pleased to respond to this consultation on the planned statutory consumer protections for consumers on heat networks. The introduction of statutory regulation for heat networks is an important step forward in delivering a net zero transition that is affordable and fair for consumers. Heat networks are a key technology in realising the UK's net zero ambitions and it is critical that the market develops in a way that does not disadvantage consumers.

We have advocated for the regulation of heat networks since 2015 publishing insights into the sector such as the customer service provided by heat networks and consumer expectations of regulation. We therefore welcomed the publication of the CMA's market study concluding that regulation of the sector was necessary. Since then Citizens Advice have been heavily involved in the development of regulation for heat networks to ensure that they will deliver positive outcomes for consumers in this sector.

Our response to this consultation will focus on those questions we are best placed to answer and provide appropriate insights to. This response is not confidential and may be published.

Consultation response

Scope of the regulation and authorisation regime

Q1: Do you agree with the scope outlined in this section and which networks the regulatory requirements should apply to? Please provide views and evidence to support your position where you can.

We broadly agree with the scope outlined in the consultation. However, further clarification regarding the boundaries of the scope would be helpful. For instance, there are existing consumer protection gaps within the standard gas and electricity licences that this new regime should seek to close. An example would be where a domestic customer is on a non-domestic supply, e.g. a flat above a shop or in student accommodation, we would expect them to receive the same protections as domestic supply customers.

We would also like to see microbusiness treated largely in the same manner as domestic consumers without different rules and would draw your attention to the [significant protection gap](#) that exists for microbusinesses in the electricity and gas retail markets. It is also worth noting that the [threshold for microbusiness/SMEs](#) is currently being reviewed by Ofgem in the retail energy market and those findings should be considered when finalising the scope for heat network regulation.

Finally, there should be a requirement for heat networks to connect and supply customers on the network where this is requested. If a property has been disconnected due to outstanding debt from a previous occupant then this should not impact reconnection for the new occupier.

Q3: Do you agree with our proposal for the separate authorisation of entities where there is a 'bulk supply agreement' in place and operation/supply for district and in-building networks is split?

The proposed separate authorisation seems a reasonable approach but care must be taken that the process does not become over-complicated and impact

consumers' ability to receive the same outcomes and protections as other heat network consumers.

Regulating small networks

Q4: Do you consider that our approach to regulation is suitable for the large number of small networks in this sector?

Yes. It is right for regulation to focus on the end outcome for consumers and we believe that the approach outlined is proportionate and aims to do just that. It is critical that all heat network consumers receive equivalent protections regardless of the size of the heat network supplying them.

Q5. Do you consider there to be any consumer protections rules proposed in this consultation that small networks will struggle to comply with? Please provide rationale.

The focus on outcomes for consumers should allow for heat networks to meet their obligations in a way that works for their size. Transitioning to a regulated sector will be challenging for all actors but we believe that the proposals outlined have taken due account of the diversity of heat networks across the sector.

Q6. Do you agree with our proposal to not capture very small building conversions and annexes? What would be the advantages and disadvantages of including them? Are there any other similar scenarios that you believe we should not capture? Please provide rationale.

Yes, this is a reasonable approach.

Authorisation process

Q7. Do you agree with our proposed approaches for the authorisation of existing and new heat networks?

Greater clarity is needed with regards to the authorisation process and conditions, and we look forward to the detailed consultation due in the first quarter of 2024. Without further details is it difficult to agree with the proposed approaches. Additional information is needed as to the role of technical

standards in the authorisation process for new heat networks, in particular to ensure that under-performing networks, in terms of efficiency and reliability, are captured early to prevent unintended consequences for consumers.

Standards of conduct

Q9. Do you agree with the proposal to use a mixture of principles and prescriptive rules to protect consumers? Do you agree with our assessment that parts of the sector are likely to want directive rules and supporting guidance to help them comply?

We agree with the proposal to use a mixture of principles and prescriptive rules to protect consumers. In terms of the need for rules versus guidance, any decision around which is the most appropriate for any given situation should focus on which is most likely to drive the right outcomes for consumers, ensuring at all times they are adequately protected. Examples where we think that clear rules are required would be for protections needed to support customers in vulnerable situations such as concerning PPMs. On the other hand, guidance might be more appropriate for elements of communicating with customers.

Q10. Do you agree with the introduction of an overarching Standards of Conduct principle for all heat networks? While we expect all heat networks to identify and support customers in vulnerable circumstances, we would be keen to understand if any networks would find this particularly challenging to deliver.

Yes. We agree that this principle should apply to all heat networks.

Q11. Do you think we should further consider requirements on consumer engagement and including the consumer voice in heat networks' decision making?

Given that consumers on heat networks are contributing significantly to the ongoing maintenance of the network and future replacement of elements of the system, we believe it would be essential to include the consumer voice in decision making. This could have additional benefits to suppliers in improving supplier understanding of the consumer experience of their network as well as

building greater consumer confidence and buy-in. The consumer voice is of utmost importance where that customer has no choice, or a limited choice, in its heating and power options.

Lessons should be learned from the approach taken to consumer engagement with energy network regulation. In particular we would highlight the development of the Ofgem [enhanced engagement regime introduced for the RIIO-2 price control frameworks](#). This engagement guidance provided a framework for monopoly energy network companies to engage with stakeholders and customers to develop their business plans, new projects and processes, customer service standards, support for vulnerable customers, and ensure appropriate input from relevant parties. There is a clear parallel with heat networks where customers may not be able to choose alternative suppliers for their energy. Ofgem's guidance provided a framework for each company to build an appropriate stakeholder and customer engagement process and it is recommended that a similar enhanced engagement guidance framework be put in place for heat networks by Ofgem. This will provide a consistent and transparent methodology for engaging with stakeholders and customers for both existing and new heat network projects.

In particular, the use of Customer Engagement Groups (CEGs) was mandated within the enhanced engagement guidance during the energy network business planning process. These CEGs input into the development of plans and projects, and were made up of consumer groups, industry experts, and local representatives. Such groups also have a key role to play in holding companies to account for established business commitments and operations. We would recommend the mandated inclusion of CEGs or similar groups to input into the development of new heat networks and service standards, into developments of existing heat networks, and to hold the heat networks to account for their performance. We also recommend that stakeholders and customers from a wide and inclusive demographic are included to ensure that the broadest views are collated, especially from those in hard to reach demographics (vulnerable customers, those from marginalised groups, etc.).

Our review of the Ofgem enhanced engagement process for the RIIO-2 price control process, including recommendations for improvements:

Fair pricing

Q12. How often should Ofgem update any public register of pricing data? How often should heat suppliers be required to submit pricing data to Ofgem?

We consider that any public register of pricing data should be updated on a quarterly basis. Supplier obligations should support this publication timeline.

Q13. What are your views on Options 1,2,3 and 4 for centralised price transparency? What combination of options would work best? Please provide detail on why a particular combination would work well.

Citizens Advice believes that a full register of heat networks is needed (option 1), and combining this with a segmented approach (option 2) would be the best option. It will allow full transparency for data on pricing and efficiency, and would allow comparison of networks that are comparable based on size of network, technology etc.

Q15. What are your views on a general obligation on heat networks to provide fair and transparent prices, accompanied by rules and/or guidance, setting out minimum expectations, principles and good practice? We are particularly interested to hear from leasehold arrangements, not-for-profit networks and small players.

Q16. Do you agree with the broad set of outcomes (in the bullet point list on page 41) that would define our expectations on fair pricing?

Citizens Advice believes that regulation should require heat networks to provide fair and transparent prices to their customers. This must be supported by clear rules and guidance that will drive positive outcomes for consumers by allowing them to make informed choices when it comes to buying or renting properties on heat networks and also enabling them to best control their energy use.

It will be important that Ofgem is able to effectively monitor this obligation and consideration needs to be given to capturing data from other organisations that would support this monitoring and allow for flagging where heat networks might be falling short of this obligation.

Currently, high energy prices are being driven by an increase in wholesale gas prices which look set to continue. With many heat networks using gas-fired CHP as their heat source, this has exposed a shortcoming in many of their fuel procurement strategies and highlighted that many heat networks are unable to hedge as effectively as large scale gas and electricity suppliers. This has left many consumers significantly exposed to ongoing high energy prices with the potential for many of these people to now be pushed into fuel poverty. We believe that Ofgem and government need to monitor the impact of current fuel purchasing strategies on heat network consumers. Further work may be required on how heat networks can be assisted to improve their purchasing strategies including how they will transition to low carbon heat sources.

Q17. We are interested in stakeholder views on the balance between prescriptive rules (setting minimum standards) and general guidance that could be introduced across all heat networks. Which areas, in table 4 and appendix 1, should be covered in rules, which should be covered in guidance, and which should be left to the market?

It is vital that Ofgem gets the balance right between principles and prescription to raise standards. We believe that the experiences of financially vulnerable consumers in particular warrant specific prescription, monitoring, and enforcement.

Prescriptive rules should apply to restrictions on the passing on of fines, debt management, customer service charges and approaches to protecting financially vulnerable consumers.

Network efficiency, site and business comparisons, maintenance and service costs, cost reflective pricing, rates of return, hedging expectations, capital cost recovery and cost subsidisation are all areas that could be covered by guidance.

Given the diversity of the sector and nascent nature of the market we do not believe that any of the areas outlined should be left to the market at this early stage.

Comparison methodology and benchmarking

Q24. What are your views on the proposed benchmarking approaches? Do you agree that Ofgem should develop 2, 4 and 7? With each approach, what are the main considerations and implementation challenges for the sector that should be considered when developing the methodology?

We consider that the development of options 2, 4 and 7 are the most appropriate.

Q25. What are your views on how Ofgem should approach segmenting the market for price benchmarking? What are the main characteristics that should be considered?

Given the unique characteristics of the sector it is inevitable that some segmentation will be required to understand the difference in costs based on some key characteristics. However, it is important that any segmentation does not simply make it more palatable for some networks to charge higher prices to consumers and the aim should be to provide consumers with fair and transparent pricing. The ultimate outcome for any benchmarking in this sector should be to support the delivery of affordable heat for consumers across the sector irrespective of differing network characteristics.

Pricing investigations and compliance

Q26. What are your views on how Ofgem should approach guidance on price investigations? Do our proposals cover the type of content stakeholders would expect?

It will be important that guidance on price investigations sets out a clear process with clear expectations from all stakeholders. It will also be necessary to be explicit in where Ofgem will seek additional evidence from and how that will be used and weighed up in the overall process. There should also be clarity on the potential outcomes of the investigation process including where investigations may be made public.

Q27. What information and evidence should Ofgem be seeking as part of our monitoring activity to identify where there is a case of disproportionate pricing?

Identifying the causes of high costs to consumers must be a key part of Ofgem's monitoring activity and this will be reliant on networks sharing information about the operation of their network including things like efficiency of the system, purchase price of fuel etc. Ofgem should also consider where other stakeholders might hold data that is useful to help pinpoint cases of disproportionate pricing such as Citizens Advice, Energy Ombudsman, Housing Ombudsman and heat network trade associations.

In addition, Ofgem should be monitoring complaints data from suppliers themselves to ascertain if there are spikes in complaints related to pricing.

Price regulation

Q28. Do you agree that price regulation, such as a price cap or profit regulation, should not be introduced in the near term but that this should be kept under review?

Since the government's initial consultation on building a market framework for heat networks was published in 2020 much has changed in the energy market. Driven by the crisis in Ukraine wholesale gas prices reached an all time high driving energy bills to reach unprecedented levels. These levels required government support last winter to ensure that people could afford to heat their homes and feed their families. The support for customers on heat networks was more mixed, with government only stepping in to help heat network customers at a later stage than those using gas and electricity.

Despite current concerns around its functionality, consumers on gas and electricity do benefit from a level of protection through the price cap but it is unclear how people on heat networks might be able to benefit from price regulation. Until regulatory rules and guidance is able to make a demonstrable difference to the efficiencies, and therefore cost effectiveness, of heat networks, there is a real danger that customers on these systems will continue to struggle and build up unaffordable debt levels.

We are in a vastly different world to that of 2020 when the heat networks market framework was published and it is only right that preparatory work is undertaken as to what price regulation should look like for heat networks and under what conditions it might be triggered and for how long.

Quality of service and supply of heat

Q29. Do you agree with this approach to regulations related to complaints handling?

We agree that complaints handling rules need to be aligned with those in the gas and electricity markets, and we look forward to a more detailed consultation on this in 2024.

Q30. Do you agree with the proposed core elements of the guaranteed standards of performance?

Yes.

Q33. Do you agree that Guaranteed Standards of Performance should apply to all domestic and microbusiness consumers, regardless of who operates the network? Do you agree that business consumers larger than microbusinesses should be excluded and allowed to negotiate their own service levels and compensation amounts?

Yes, however, we believe that guidance should be developed to assist those businesses in developing and setting reasonable service levels. SMEs in particular can find navigating energy supply negotiations challenging and without an option to switch it will be important that negotiated service levels and compensation amounts do not disadvantage smaller businesses.

Market-led step-in arrangements: reducing the risk and impact of market failure and ensuring continuity of heat supply

Q34. Do you agree that the proposed conditions, in table 6, could be appropriate for heat networks? We are interested in evidence and views on how the conditions could be adapted for Heat Networks and examples of good practice.

Yes, there is no reason that these conditions should not be used for heat networks and it is reasonable that consumers are protected in this way.

Q35. What are your views on obligations and protections that are currently in place for ensuring continuity of heat supply in the case of a failure? If you consider further requirements or a regulatory safety net is required, please expand.

Protection of customer credit balances must be part of the regulatory safety net in case of a heat network failure. For gas and electricity consumers this is paid for through a levy on all customer bills so consideration will need to be given to the mechanisms which could support this such as an ongoing industry fund or insurance product.

Q36. What are your views on heat networks being contractually required to have a contingency plan in place to ensure the continuity of heat supply? Should this obligation apply to all heat networks, including small networks?

Yes, it should be a minimum expectation for consumers that their heat supply is maintained when a company goes out of business. This is an essential protection in the gas and electricity market.

Q37. What are the challenges and costs of placing this obligation on existing heat networks? What timescales or transitional period would be needed.

The challenges and costs will relate to the lack of initial business planning that will require a potential renegotiating of longer term contracts. Costs could be minimised through making changes at natural trigger points such a contract renegotiation or break clauses. Where longer term contracts don't allow for this

then potential changes required to deliver the obligation should be costed up and then risk-assessed to understand if those changes are necessary and would result in the best outcome for those consumers. Overall, we believe that timescales for these changes for existing heat networks should be kept to a minimum to avoid a two-tiered system of regulation.

Q38. How should Ofgem monitor compliance with the requirement for heat networks to have a CSCP in place, recognising the scale of the sector, number of plans that should be in place and the overall approach envisaged for monitoring and compliance?

Ofgem should be able to respond to legitimate concerns that a heat network is without a CSCP and be able to investigate. Heat networks could submit these as part of the authorisation process or they could be checked and certified by a third party as part of this process. Other options could be publication of the CSCP annually on their website (this could be a summary document where it contains commercially sensitive information) or via a board attestation process.

Q39. Should guidance be provided on the content of the CSCP? What key things should be covered in the guidance? Should there be minimum standards and how might these be different for various types of network?

Yes, we believe it would be beneficial to provide guidance to heat networks on the necessary content for a CSCP.

Protections for consumers in vulnerable circumstances

Q40. Do you agree with the proposal to require heat suppliers to operate a Priority Services Register and provide specific services for consumers who need them? As previously stated, we would really welcome views from networks that would find it particularly challenging to deliver this.

Yes, operating a PSR should be a minimum requirement for heat suppliers in providing good outcomes for consumers in vulnerable circumstances. This is

especially important where they have a higher proportion of consumers in these circumstances.

It is important to note that even with the PSR there are still many consumers who do not access the support they are entitled to. As highlighted in our recent publication, [Closing the gap](#), any reforms in this area should improve outcomes for heat network consumers as well as traditional energy supply. This includes considering whether PSR data should be shared with energy networks as is currently the case in the retail gas and electricity markets.

Q41. Do you agree with our approach to drive good debt management practices and deter disconnection? Do you agree that assessing ability to pay and offering tailored repayment plans is possible for small heat networks operated/supplied by small entities?

In the interests of fairness and consistency of protection for consumers it will be important that even small networks operated by small entities are able to support those consumers who are struggling to pay. The ability to pay principle and new rules around proactively managing debt in the energy retail sector set out in Ofgem's recent [Consumer Standards decision](#) should also apply for heat networks. We understand that non-payment of even a small number of customers will be more difficult for these networks so it will be even more important for these networks to have effective and fair debt repayment plans in place.

Q43. What do we need to consider when exploring a disconnection ban for the sector? We welcome evidence you can provide on benefits to consumers in vulnerable circumstances (including what groups of consumers should be protected), impacts on wider consumers (including specific financial impacts on other consumers on the network), and impacts on heat suppliers (for example with regard to cashflow and financial stability).

Energy is an essential service. Without access to heat, the impact on health and wellbeing of those in the household is significant, and in some cases fatal. The significant restrictions on disconnection for debt in the traditional supply market

followed the case of two pensioners who died following disconnection (the Bates case) and this should be at the forefront of decision makers' minds as new rules are developed. The new [definitional work](#) on where it is inappropriate to force a prepayment meter into a home (essentially disconnecting them if the supplier is aware they cannot afford to top up) are particularly vital to consider in heat network standards.

Q44. Do you agree that non-payment of heat charges when part of housing charges should follow housing non-payment protection rules?

Given that it would be challenging to understand if non-payment of housing charges is due to the heat charge element then this approach seems sensible. However, this should be monitored as it will be important to understand if increasing energy costs are driving non-payment and if so Ofgem must be able to interrogate the rising heat costs of those people on heat with rent contracts.

Pre-payment meters and use of powers of entry

Q46. Do you agree with the approach for ensuring that consumers in vulnerable circumstances do not resort to self-disconnection or self-rationing and that PPMs are only used where appropriate for the consumer?

Q47. Should we include financial vulnerability as a required consideration for whether a PPM is 'safe and reasonably practicable'?

Q46 & 47. In our work on PPMs in the energy retail sector we have been clear that PPMs should not be fitted in certain circumstances and, while we appreciate that heat networks are a different commercial proposition, we would be concerned if the same protections were not extended to consumers on heat networks.

As a minimum we would expect heat networks to replicate the [new PPM rules](#) outlined by Ofgem on the 13th September 2023. However, we are also of the view that this should be extended to include the under 5s due to the health implications of living in a cold home.

Q49. Do you agree with this approach to regulation for ensuring heat networks have sustainable cash flows and only install PPMs involuntarily as a last resort?

After extensive work investigating the experience of consumers with PPMs in the retail energy market, Citizens Advice is of the view that forced installation of PPMs (including smart meter mode switching) must only be as a last resort and then must follow clear guidelines and controls to protect consumers. This is even more critical in a sector where consumers cannot switch supplier.

Transparency of information to the consumer

Q50. Do you agree with our proposal to increase the rollout of individual AMI heat meters? If you disagree, please indicate why, and provide evidence to support this view.

We support this proposal. Smart metering brings various benefits to consumers, particularly those on prepayment, most significantly around increased means to top-up, to identify vulnerability and apply financial support directly to meters rather than relying on vouchers or other less reliable methods.

It will also be important for consumers to have access to In Home Displays, including Accessible In Home Displays where needed for consumers with additional barriers to engaging such as visual or dexterity impairments - this would bring the consumer experience into line with the broader smart meter programme. Learning lessons from the smart rollout will be key across the board, procuring and using established and widely available existing equipment like In Home displays cheaper, more reliable, more consistent and clearer for consumers than procuring distinct products for heat networks. Allowing consumers to have consistent messaging across the board with regard to smart technology and avoiding different tiers of service expectation will be crucial.

Q51. If yes, are there any functions not in our specification that should be included? If no, would any changes to the specification have a substantial impact on your answer?

We would note that the proposed technical specifications only require 6 months of data to be stored, we would suggest this be increased to at least 13 months so that consumers are able to compare their past year's usage to their current year's.

There is also a lot to learn from the smart meter rollout in terms of data handling. Regulation such as the Data Access and Privacy Framework which affords consumers the ability to choose what detail of their personal usage data they share have proven invaluable in increasing consumer trust in smart metering and affording them some leverage in exchange for sharing more detailed insight into their usage. Similarly the ability to take their data and share it with authorised third parties for, for example, tailored energy efficiency advice, will be crucial.

The technical specification should consider consumer interoperability and access needs as well as those of the service provider.

Q52. Is it reasonable or technically feasible to require that dwelling level meters be installed in common/public areas outside of that dwelling? If not, why not?

It is reasonable to install dwelling level meters outside of the dwelling and would allow easier access for meter readings and any works that might need to be carried out on the meter. In terms of feasibility we understand that some heat networks already do this, although it can often be in locations where the consumer cannot access and read the meters themselves which would be an unacceptable outcome.

Q54. Do you agree with our view that accurate consumption tracking with HCAs is effectively impossible?

Yes, we agree with the view that their use needs to be limited but also monitored so their use can be tracked.

Q57. Do you agree with the proposed rules on billing information, frequency and method?

Yes but for unmetered properties billed through a service charge or rent we believe it should be made clear that the expectation is that heat bills are supplied at least once a year.

Q58. Do you agree with the proposed rules on back-billing, price change notifications, and heat supply contracts?

Citizens Advice supports the restriction of back-billing to 12 months only and do not consider it reasonable to extend this to 18 months to align with the Landlord and Tenant Act. The 18 month period allowed in the Act for service charge

back-billing does not prevent the housing sector from improving their processes to allow for annual heat back-billing where needed.

We agree with the proposed rules on price change notifications but heat supply contract rules should clearly state what constitutes a reasonable period of time for providing copies of the contract to the consumer.

Q59. Do you agree that this package of measures on pre-contractual transparency will provide prospective consumers with sufficient information prior to and during a property transaction? What further information and mechanisms for providing that information should we explore further?

Q60. How can we ensure pre-contractual transparency for prospective consumers in new developments?

Q59 & 60. There is a lack of familiarity with heat networks which makes pre-contractual information much more important to the consumer. Further exploration of providing average or estimated running costs could be helpful as well as intended billing frequency and payment methods. In addition, contract length must be made clear in the standardised set of information on contractual arrangements. To ensure consistency for consumers we would also recommend that templates are produced for heat networks to follow. Ofgem and DESNZ should consider who would be best placed to develop such templates.

Sequencing of consumer protection rules

Q63. Do you agree with the proposed rules and activities for introduction in the first year of regulation? Are there any that you think should not be introduced in the first year?

We agree with the proposed rules and activities outlined for introduction in the first year.

Q64. Are there any other rules or activities that we should introduce in the first year of regulation?

In its consultation, building a market framework, government was clear that action on preparing for regulation did not need to wait until the regulation was live.

The phased approach risks undermining consumer confidence in the regulation as well as confidence in those bodies responsible for delivering aspects of it. Any phasing must be set out clearly and widely disseminated to manage expectations of both industry and consumers. Consumers must believe from day one that heat networks regulation is able to respond to and act upon their concerns. Therefore, all the rules and activities introduced in the first year must allow for us to do that.

Access to data from the sector will be critical to delivering effective regulation and we would welcome further clarity on how Ofgem will action its market monitoring and auditing functions in year one.

Monitoring, audit, compliance and enforcement

Q65. Should we take into account different market segments in our approach to general monitoring and compliance and financial monitoring? If so, what factors should we consider?

The list outlining the general monitoring, compliance and financial monitoring seems a good starting point. Any approach should ensure full and timely responses by heat networks to the need for information.

Q67. Do you agree with the overall scope of and approach to auditing to support compliance with regulation, including the initial areas of focus?

Yes.

Q68. Do you consider that the proposed compliance and enforcement framework is appropriate for ensuring that non-compliance is addressed?

Q69. Do you consider that our penalties policy should include Fixed Penalties as an efficient way of addressing certain non-compliance? If so, what are the main benefits and risks that need to be considered when implementing this approach, including how they would apply to different segments of the market?

Q68 & 69.

We agree that the compliance and enforcement framework is appropriate and that fixed penalties are an efficient method for addressing certain instances of non-compliance.

Ofgem's administering of the cost recovery regime

Q70. Do you agree with our proposal not to implement a payback period if the transition period is funded by the gas and electricity licensees?

Yes.

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Published October 2023.

Citizens Advice is an operating name of The National Association of Citizens Advice Bureaux.

Registered charity number 279057.