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**11 December 2020**

Dear Karen,

We are writing in response to your consultation on the proposal to defer the introduction of new questions for Social Obligations Reporting. This submission is non-confidential and may be published on your website.

**1) Do you agree with our proposal to defer the revisions to SOR to 2022?**

We think that, in light of the increased regulatory demands on suppliers due to the COVID-19 pandemic that it is reasonable to defer the introduction of the new questions for the Social Obligations Reporting, due to be implemented in January 2021. We recognise that there is an important balance to be struck between accessing important data about consumer experience while acknowledging the need of suppliers to urgently respond to the unexpected outcomes of COVID19. This is a balance that we have actively aimed to strike in our own requirements of suppliers, in relation to the Citizens Advice supplier star rating and other requests for information that we issue.

As suppliers are already providing most of the necessary information that would be requested under Ofgem's COVID-19 RFI, particularly those on self-disconnection, we think the risk of delaying the SOR changes is somewhat reduced. However, we note that not all suppliers are required to respond to the COVID-19 RFI and therefore it does not ensure the same coverage across the market.

As we outlined in our original response to the consultation on Social Obligations Reporting we support minimising the implementation time for reporting changes where possible, so that policymakers have access to evidence more readily<sup>1</sup> and we note that suppliers have already had a lengthy period to prepare for the new SOR requirements. As a result, we do not think the

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<sup>1</sup> Citizens Advice (2019) [Citizens Advice Response to Consultation on Revisions to Social Obligations Reporting](#)

length of the proposed delay (until 2022). We would support a shorter delay until mid-2021, with the opportunity for a review nearer the time of whether further delay is needed in light of factors like the progress of the pandemic response and the economic situation, and the resulting impacts on supplier capacity to make the relevant changes.

We are particularly keen that the new questions are implemented ahead of winter 2021/22 if possible in order to ensure that a full data set for the period - when consumers are often at most risk - can be collected. This will make it easier to identify trends over time, and could enable regular collection of data on self-disconnection through the period in order to monitor implementation of Ofgem's important new protections for prepayment customers and people in debt. In general, we also think there would be benefits from Ofgem publishing a range of data from Social Obligations Reporting more regularly in order to have a more regular insight into the experiences of customers in the energy market.

**2) Do you agree with our proposal to allow suppliers to submit a nil / zero return for the questions that would otherwise have been removed from the SOR question set?**

We do not object to the proposal to allow suppliers to submit a nil/ zero return for the questions that would have been removed from the question set. In our original response to the consultation on the proposed changes<sup>1</sup> we supported the removal of these questions as we think that the data collected in the remaining questions are sufficient.

Yours sincerely,

Connie Thorn

**Patron HRH The Princess Royal      Acting Chief Executive Alistair Cromwell**

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