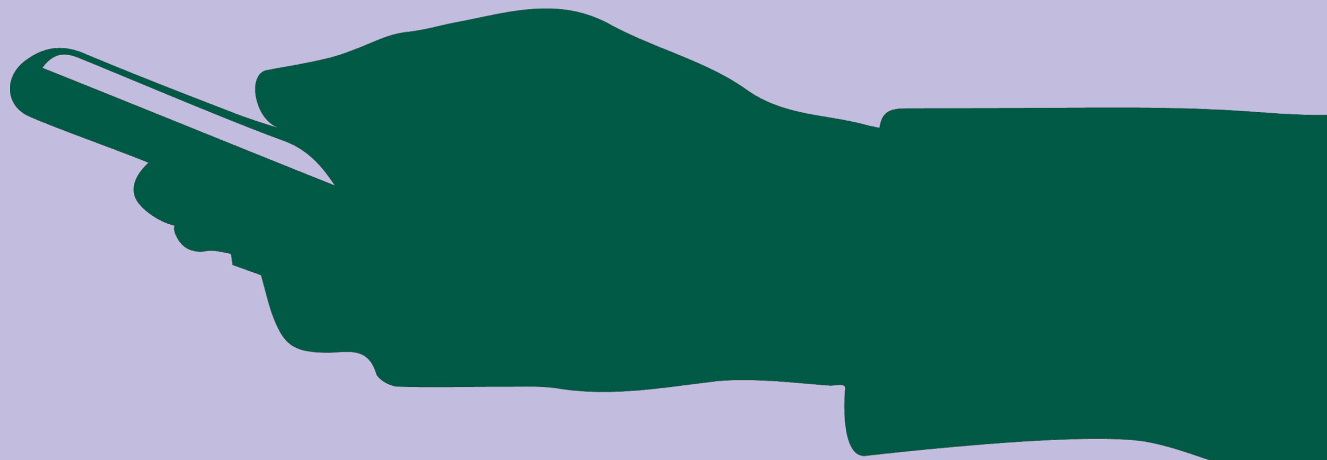
Future proof

Challenges and opportunities for providing great service in energy



Contents

Introduction

We worked with the Institute of Customer Service (The Institute) to look at how the sector is performing against customer expectations and what will be important to people in the future.

This showed that satisfaction in the energy market has been flat over recent years and lags behind other essential services. Meanwhile, data from our customer service star rating shows that individual supplier performance has been more mixed, with many improving while some have declined.

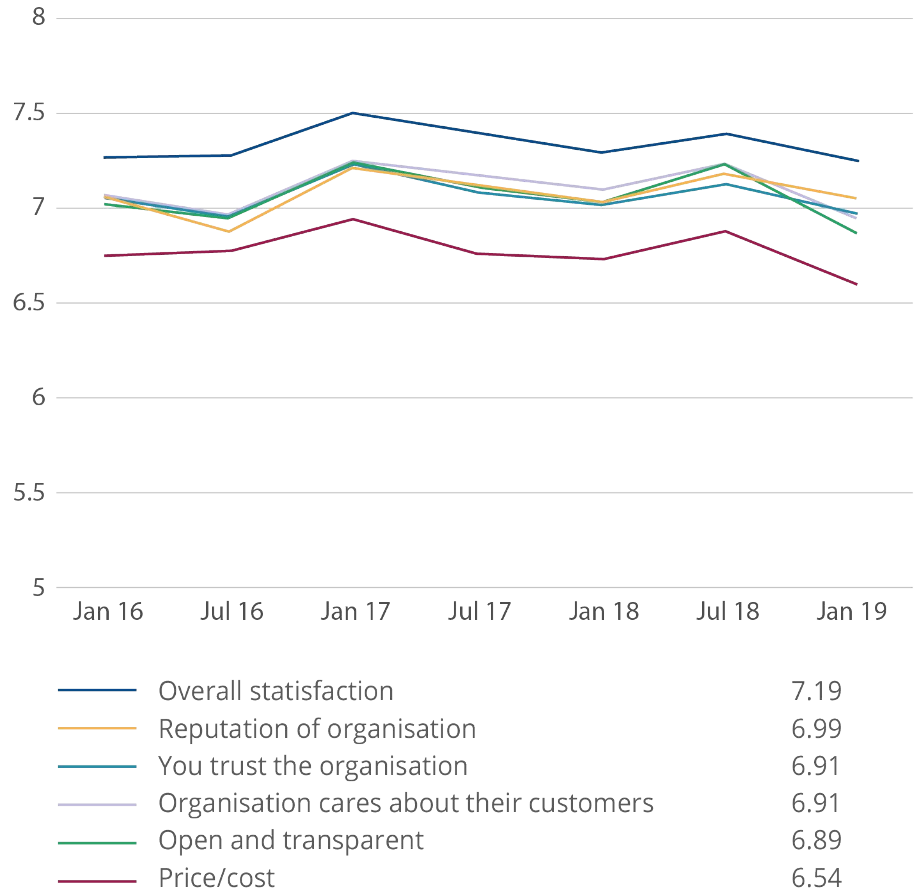
Over this period the industry has been going through a period of significant change:

- Price caps have added cost pressures for suppliers, some of which are making savings by redesigning their service and promoting online channels.
- Market consolidation continues through both mergers and a large number of supplier failures.
- New products give customers more choice but risk adding complexity to a market already perceived as confusing.

This research was conducted before the COVID-19 outbreak. In the immediate aftermath most suppliers have rightly focused on supporting their vulnerable customers. We've outlined how the sector should respond to the next phase of the pandemic in our report 'The end of the beginning'. The success or failure of their response could rebuild trust, or weaken the sector's reputation further.

In the longer term, it is likely this crisis will accelerate some of the trends we identify in the challenges and opportunities to improve the consumer experience of the sector.

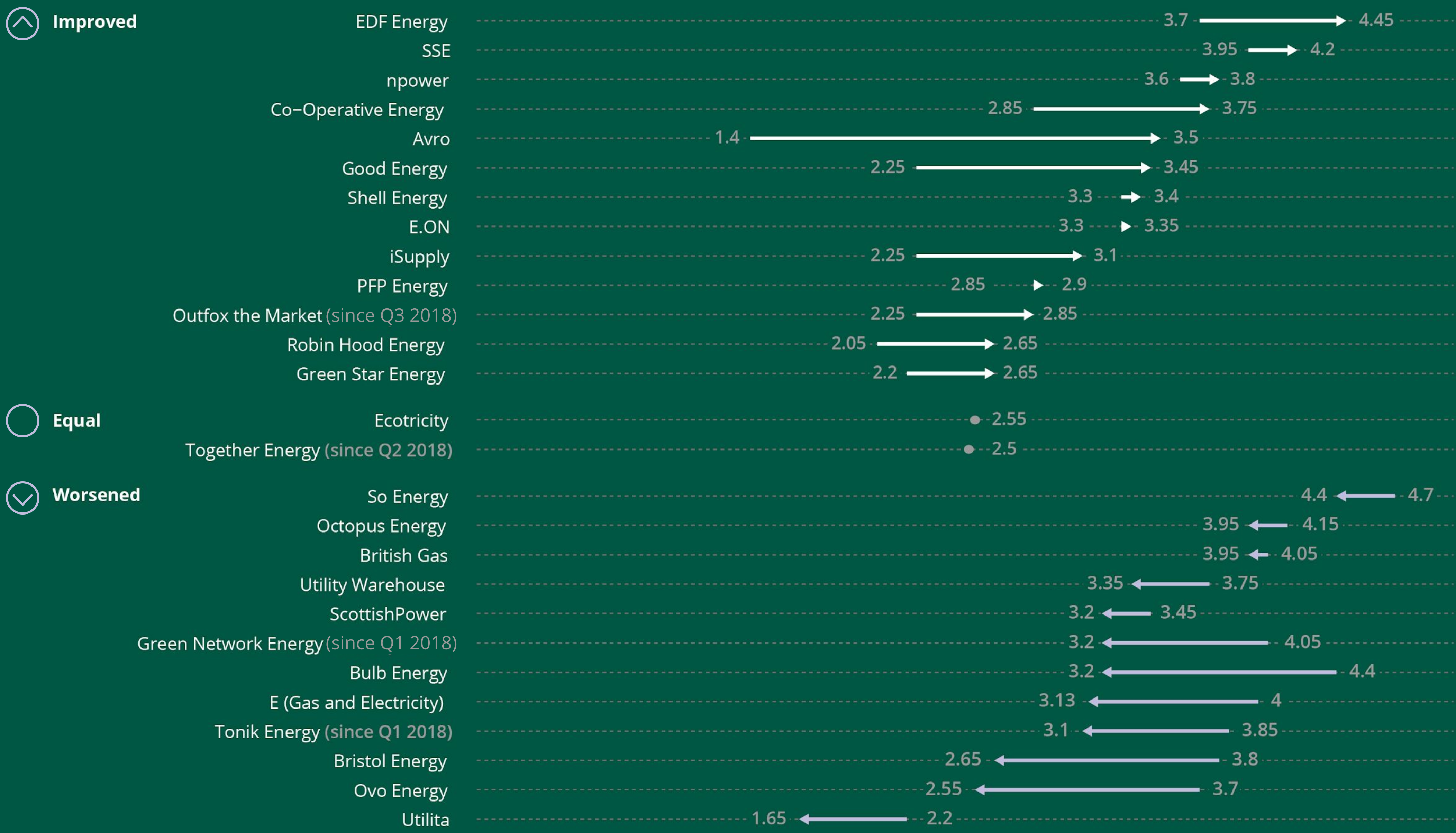
Satisfaction with energy suppliers (Average rating out of 10)



Data from The Institute's UK Customer Service Index

Many suppliers' performance has decreased since 2017

Citizens Advice star rating data (Q4 2019)[1]



Key challenges

Overcoming poor reputation and perceived complexity

Energy performs worse on reputation than any other essential services sector*

- 8.0 Banks/building societies
- 8.0 Insurance
- 7.4 Telecoms and media
- 7.4 Water
- 7.2 Energy

Improving consumer experience of complaints

Consumers who've had a complaint tend to be much less satisfied than those who haven't*

No complaint	7.3/10
Had a complaint	5.3/10

Responding to diversifying communications preferences

Over 50% want to use web channels to manage account or choose new products

Over 50% prefer to use telephone services when things go wrong

Ensuring services work for people with different needs

People who are limited a lot by disability or physical/mental ill health are significantly more likely to want proactive support to save money, manage payments and know about support services.

*data from The Institute's UK Customer Service Index

Opportunities to improve

Support consumers to engage

20% of consumers who don't switch say it's because it's too much hassle.

Consumers want to be supported to engage with a complex market. Suppliers can increase trust by helping their customers understand how to switch.

Provide a more personal service

Consumers want to be treated as individuals by energy suppliers, and for staff to be friendly while they help them

Help consumers reach net zero

Over 80% of consumers support net zero, but for those who want to make changes, most say they need more advice and support to get there. Consumers want more information from suppliers on self-generation and changing time of energy use.

Tackle the loyalty penalty

£250

Consumers can end up paying up to £250 more for a default tariff than the best deal with their same supplier. Consumers want suppliers to help them to get the best deal possible and reward their loyalty.

Our approach

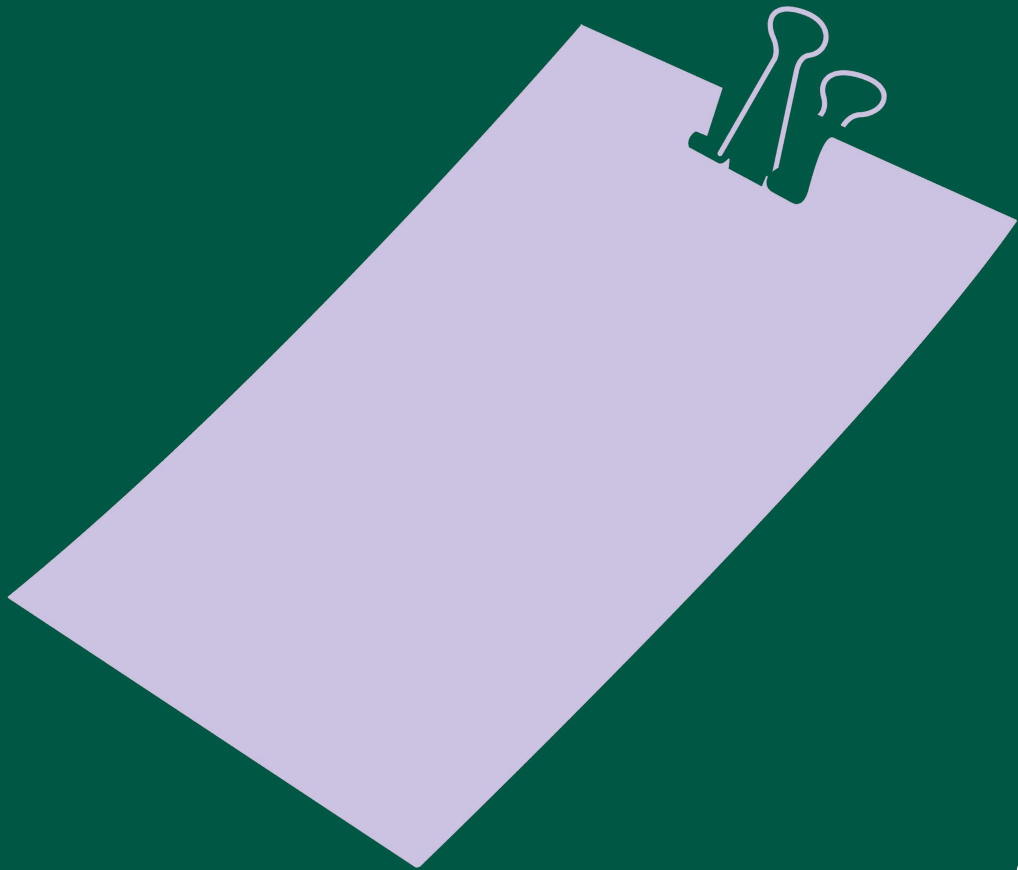
This research was done in three parts:

- Looking back at the past 7 waves of The Institute's UK Customer Service Index to see how customer service has changed, and looking at changes in customer priorities from 2015 and 2019.
- Qualitative interviews with 15 energy consumers throughout GB, and 15 energy industry experts across industry (retail, networks, and data services).
- Quantitative survey of 2063 consumers across GB looking at the importance and performance of 47 opportunity statements identified from the The Institute and qualitative interviews.

The full Institute of Customer Service research report is published alongside this one.

We used this data along with our **supplier customer service rating** and our tracker survey - jointly commissioned with Ofgem and conducted by Accent - on **consumer perceptions of the energy market**. All data from the tracker survey is from the Q1 2020 release, unless otherwise specified.

All quotes in the report are from the qualitative interviews, unless otherwise stated.



Energy has a worse reputation than other sectors

Consumers interviewed in the qualitative research phase thought the energy sector has a poor reputation.

This was driven by the complexity of the market and a lack of transparency. Analysis of the UKCSI shows that reputation and trust have greatest impact on overall satisfaction.

A number of events contributed to the poor reputation:

- Price rises and pricing strategies that charge loyal customers significantly more
- Mis-selling - particularly in relation to face-to-face sales
- Poor service by some new entrants and supplier failures

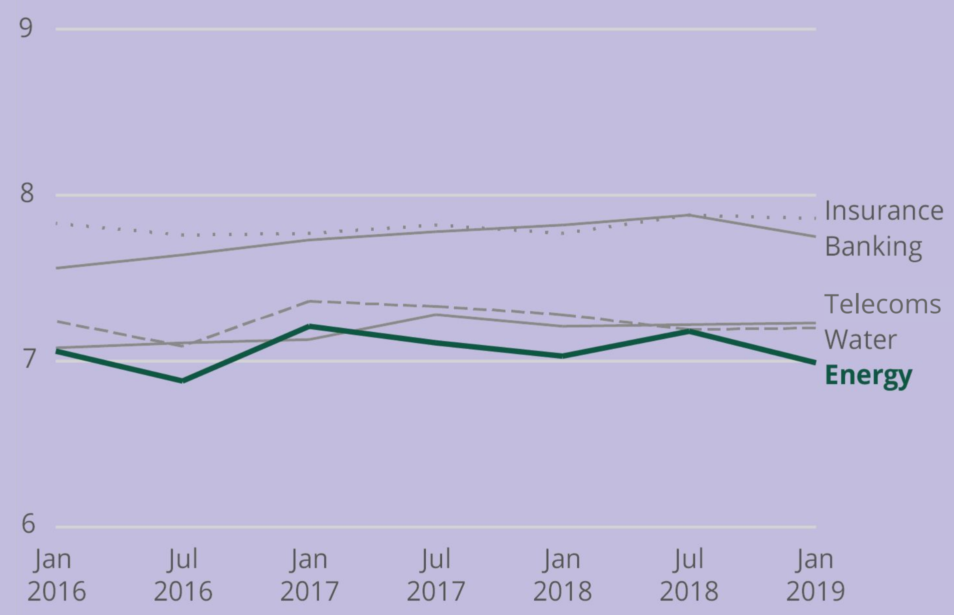
Regulatory changes that require suppliers to treat customers fairly have helped refocus the sector on consumer outcomes, while tougher licensing should clamp down on poor service.

The covid-19 crisis presents an opportunity to understand the effectiveness of these changes and - if suppliers support their customers - improve the image of the sector.

Traditional energy supply has had little product differentiation, which can lead consumers to view all in the sector as the same. More varied offers, like time of use tariffs and bundled products, are emerging which could improve customer transparency of the provided service.

Energy has tended to have the lowest reputation rating of all regulated industries in recent years

Rating of whether the sector has a good reputation. Average score out of 10.



Data from The Institute's UK Customer Service Index

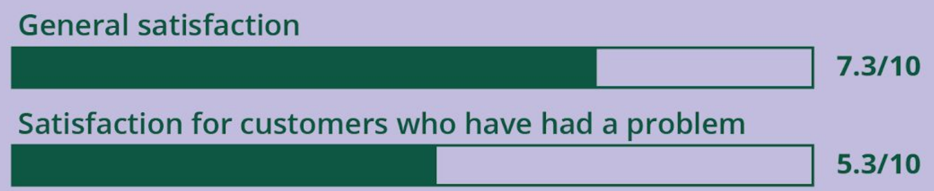
The complaints process still isn’t good enough

Customers don’t need to interact with energy companies frequently. Often the main interaction a consumer has is when something goes wrong.

Our tracker survey[2] shows the most common reasons for complaints are:

- **Billing and payment issues**
- **Pricing and cost issues**
- **Problems with meters and smart meters**

Overall, the UKCSI analysis does not identify complaints as an area where consumers are most keen for suppliers to improve. But where consumers have experienced a problem, there is a large impact on their overall satisfaction.



Complaints data from our **star rating** also shows there has been a decline in average complaints handling performance since 2016.

Complaints per 10,000 customers

Better data from smart meters and improved systems should mean problems can be understood and resolved quicker, enabling suppliers to focus more on repairing the relationship with the consumer.

But these benefits don’t appear to be being delivered yet. Meanwhile, the risk of dissatisfaction will increase as products become more complex, and consumers use new services that they aren’t used to.

In the quantitative research The Institute asked consumers how important they rated different aspects of service specific to complaints. The average rating was more than 7 out of 10 for all aspects, but some were more important than others.

Importance ratings of different aspects of service around complaints

The current complaints journey

The current complaints process is governed by the Consumers, Estate Agent and Redress Act 2007 and The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008

Day 1

Customer has a problem

They contact their supplier to complain. Customers can make complaints verbally or in writing.

10% of consumers who recently contacted their supplier did so to complain[2]

Day 2-5

Supplier responds

The supplier can't resolve the complaint by the end of the next working day. They must contact the customer and direct them to their complaints procedure.

32% of people who recently complained gave up within the first 3 months[2]

Customer seeks advice

The customer can contact Citizens Advice consumer service for support with their complaint. If they are vulnerable or the case is complex, it can be referred to the Extra Help Unit who can intervene on the customer's behalf.

82% of users are satisfied with the energy consumer service[3]

90% of users are satisfied with the EHU[4]

Up to day 56

Referral to the Ombudsman

After 8 weeks - or once the supplier identifies it can't resolve the complaint - the consumer is able to take their complaint to the Energy Ombudsman, a free, independent service that can make binding decisions on resolutions.

50% of contacts to the Energy Ombudsman are outside its terms of reference[5]

Up to day 112

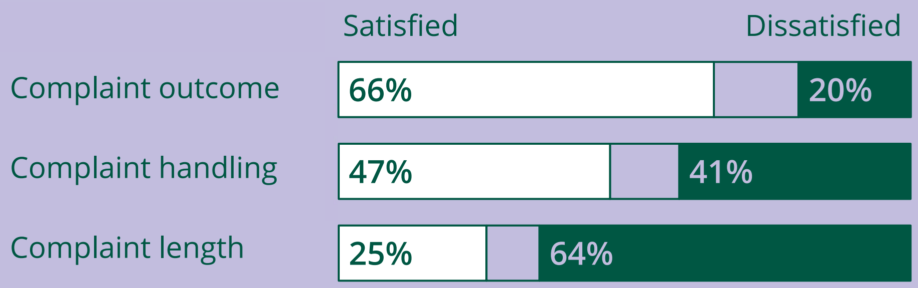
Resolution by the Ombudsman

The Energy Ombudsman process can take a while to complete, depending on the case. 83% of cases are resolved in under 4 weeks, while 99% are resolved within 8 weeks.[5] The average resolution time is 26 days.[6]

77% of users are satisfied with their experience of using the Energy Ombudsman[5]

Complaints handling falls short

Many consumers aren't satisfied with the way complaints are handled, even if they are happy with the outcome.



Source: Ofgem/Citizens Advice tracker survey Q1 2020[2]

Too often consumers have to work hard to get their complaints resolved. Customers normally recontacted suppliers **5 times** and dealt with **3 or more** different people. **75%** said they found it stressful.[7]

We think there are improvements that can be made within the current regulatory framework, for example:

- In 2019 Citizens Advice ran an **energy hack day** to find ways to make supplier complaints letters simpler and less off-putting to customers.
- Additional channels can be used - for example, the Citizens Advice consumer service has introduced web chat and so have many suppliers.
- Digital platforms can make the process better, for example Resolver and the Energy Ombudsman portal.

However, in general the current complaints rules take a prescriptive approach that doesn't align with a newer principles based approach. In some areas they are not having the desired effect, for example some suppliers do not meet requirements to ensure customers can complain by telephone. And there are problems with customers getting the right third-party support at the right time.

In the longer term the complaints journey needs to be reviewed to make sure it is fit for the future.

The focus of reforms should include:

- Increasing consumer confidence that complaints are understood and being dealt with in a timely way.
- Improving the quality of consumer interactions during the complaints process, including making it easy to complain and track progress.
- Maximising the number of customers who are able to resolve complaints themselves and are told about third party support at the right time.
- Reducing the end-to-end length of the complaints journey.
- Using complaints data to identify widespread issues and take timely compliance and enforcement action.

Any new approaches put in place must be based on robust evidence that they will improve consumer outcomes, and be trialled first wherever possible.

Communication preferences are diversifying

Changing technologies mean a wider range of communication channels than ever are available to customers and energy suppliers.

Consumers need to be able to choose from a range of channels. For some this is based on personal preference.

“I will tend to use email, my husband will tend to use the phone – phoning is a faff, automated choices, too much hassle. I think email gets dealt with quicker”

For others, they may have particular needs that mean they rely on some channels more than others.

For example, our work on people with mental health problems and essential services showed that some people have particular communication challenges. For some, talking on the phone was preferable, while it could be deeply anxiety inducing for others.[8]

Ofgem rules state that suppliers must make it easy for consumers to contact them, and that customer service arrangements must be complete, thorough, fit for purpose and transparent.[9]

Many suppliers already offer multiple channels. Experts in the qualitative research by The Institute of Customer Service identified omni-channel approaches - with conversations picked up effortlessly between mediums - as increasingly common.

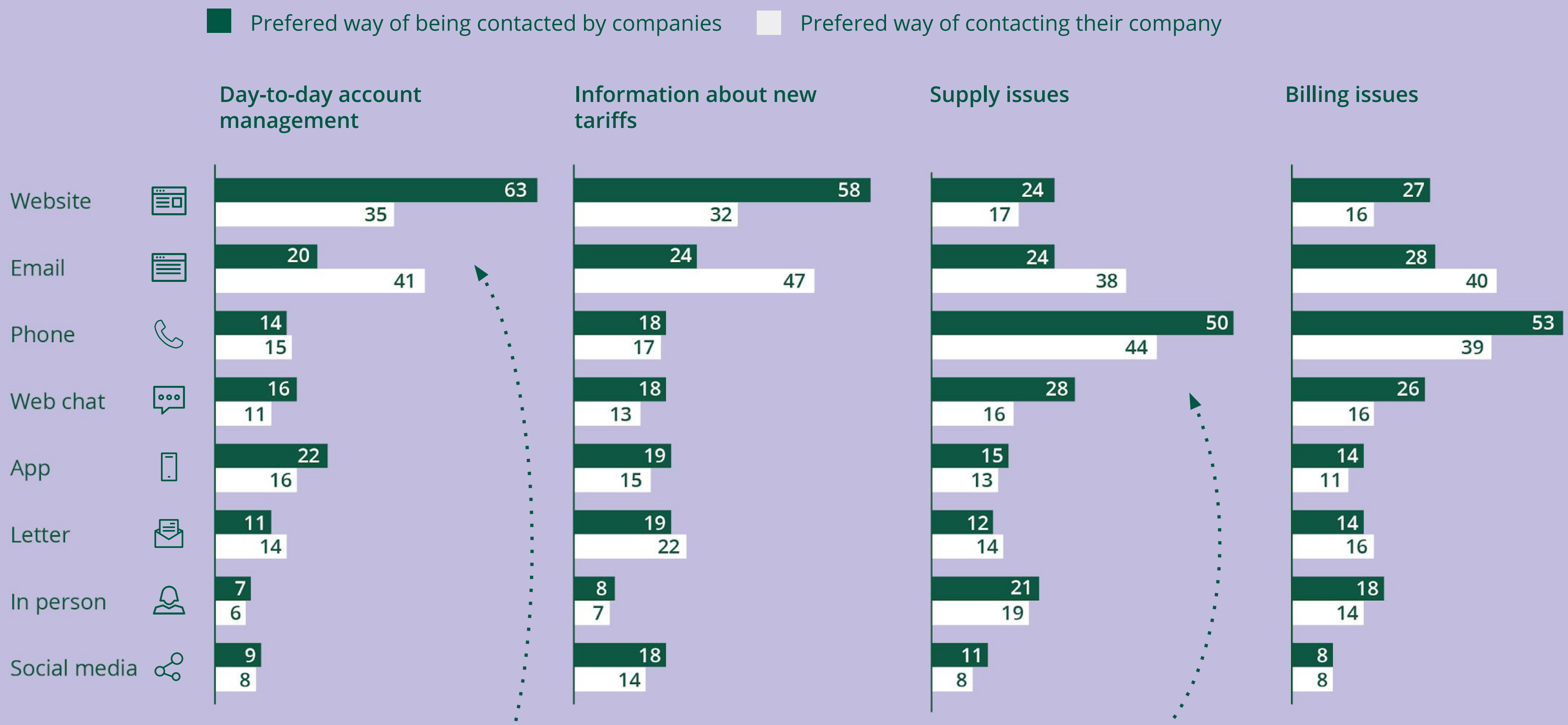
Energy UK’s independent vulnerability commission said that all suppliers should move towards this approach.[10] This is a common challenge across organisations, with Citizens Advice’s **Future of Advice strategy** aiming to provide a ‘seamless customer journey’.

We’re reflecting the changes suppliers are making by updating our star rating to include measures of email and social media performance, and plan to include webchat in future too.

The subsequent slides highlight how consumers want to use different communication methods for different issues, and this depends on whether they are contacting the company or the company is contacting them.

We’re also aware that some suppliers are limiting or reducing access to some contact channels, blaming cost pressures from the price cap, and COVID-19. Any changes must be made in a way that ensures consumer needs and preferences are still met. This is particularly the case with telephone services (see page 14).

Prefered communication channels



Prefered communication channels often vary between when the consumer is contacting a company and when they are being contacted by the company. For non-urgent issues email is the prefered method for consumers to contact their supplier, but they prefer to find information on the company's website.

Preferences also differ between non-urgent issues and urgent issues (supply and billing issues on this chart). For urgent issues consumers are more likely to want to use the phone.

Phone lines are still vital

For most urgent issues our research showed consumers prefer to use the telephone.

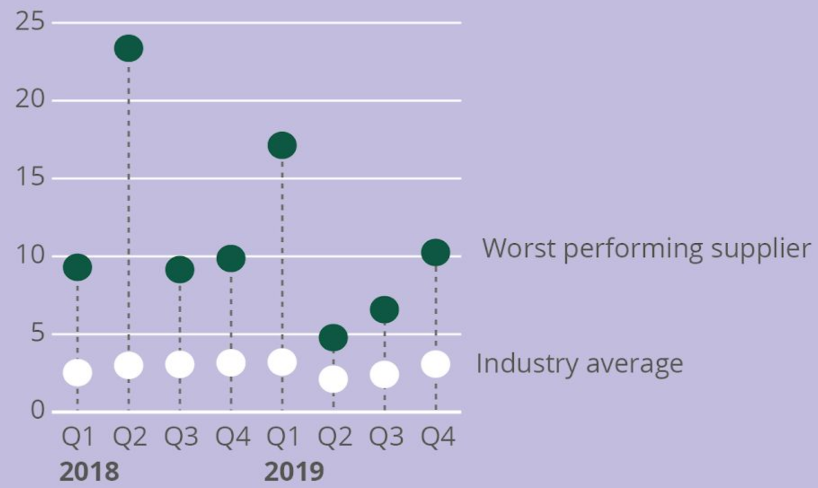
We've previously **raised concerns** about some energy suppliers not offering a telephone service for their customers, particularly those who may be vulnerable.

It's also important that suppliers manage their phone services so that wait times are acceptable and consumers can get help in a timely manner. Ofgem has previously used provisional orders to require suppliers with poor service to reduce average wait times to 2 minutes.[11]

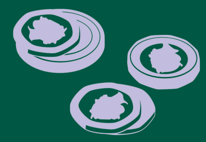
Our star rating shows that the worst performing suppliers are regularly breaking this threshold.

Call waiting times are often too long

Call waiting times in minutes, taken from our star rating



How a prepayment customer may struggle to contact an online-only supplier when they are off supply

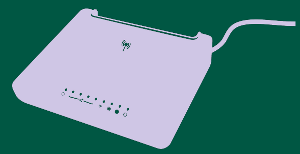


Consumer has short term financial problems, and runs out of money.

▼

They run out of credit on their prepayment meter. They need to contact their supplier to be reconnected.

▼



But losing their electricity means their wifi is now also switched off.

▼

They can't afford to top up their mobile data. And their phone dies because they can't charge it.

▼

To contact the supplier they need to use a landline, or borrow a phone from someone.

Clearer outbound communications help too

Clearer, more engaging communications should help improve transparency and reduce perceived complexity in the sector. They can also help more customers self-serve and reduce the need for them contact their supplier for help.

Some consumers in the qualitative research felt that the suppliers were trying to 'rip them off' by having opaque bills, and said they were less likely to look at their bill if it was confusing.

"I don't know what tariff we're on. We've probably kept the letter, but I have no recollection of the detail"

But this is a mixed picture. The quantitative research by The Institute of Customer Service showed that consumers were generally satisfied that bills were clear.

This aligns with our tracker survey, which found that 72% of customers were satisfied with the ease of understanding their bill.[2] However, there is still room for improvement, and for the 10% who were dissatisfied the key reasons were that:

- It was unclear how the bill was calculated (78%)
- It was difficult to find key information quickly (42%)
- The language was too complicated (36%)

There's more scope to improve in relation to non-billing communications. Consumers in the quantitative survey by The Institute were less satisfied about being informed about how to compare prices and service, or how vulnerable people can be supported.

While this information may be provided, it may not being done prominently. The majority of consumers do not recall receiving information on these areas, but of those who did, more than 90% felt it met their needs.

The main outlier was price rise notifications, where more customers (49%) remembered receiving them, but 1 in 6 of them said the information did not meet their needs. This is important, as price changes are a key driver of distrust.

Suppliers face an undoubted challenge in trying to increase engagement with their communications, while maintaining their usefulness for as many consumers as possible. But it's vital that progress is made as more complex products and services are rolled out.

The regulatory framework should help drive these changes, as more engaging communication is a key target of the communication principles introduced by Ofgem in 2018.

Different consumers have different needs

Every consumer has characteristics and preferences that need to be taken into consideration by suppliers. The range of preferences is likely to increase, as some consumers prefer innovative, digital routes while others want or need more traditional solutions.

This is a particular challenge for large incumbent suppliers who are likely to have the widest range of customers, including more vulnerable groups.

However, all suppliers need to be prepared to deliver good outcomes for a range of customers. They cannot simply rely on people picking services that meet their needs.

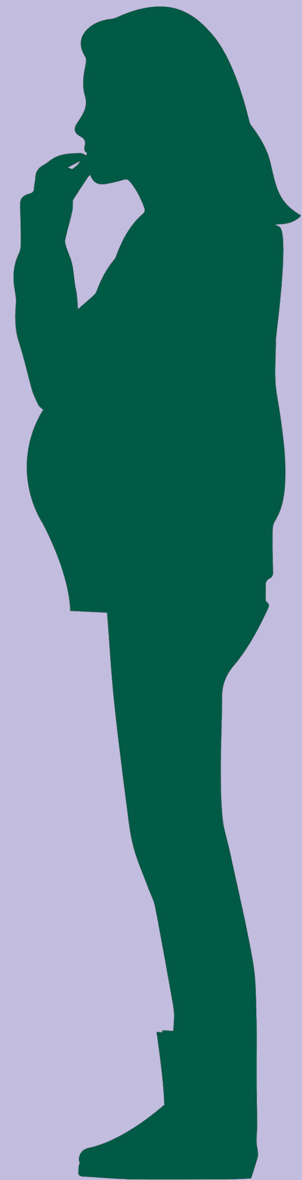
There are two reasons why.

Consumer needs change over time. Someone can be comfortable using an online-only service when they sign up, but this can change, if they become unwell.

Not all consumers choose their energy provider. Those who move into a new property remain with the existing provider until they switch.

Our research found different demographic groups had differing priorities for customer service. Some of these demographics particularly relate to people's propensity to experience some form of vulnerability.

It's important that with increased pressures from COVID-19, suppliers don't reduce the channels available for consumers.

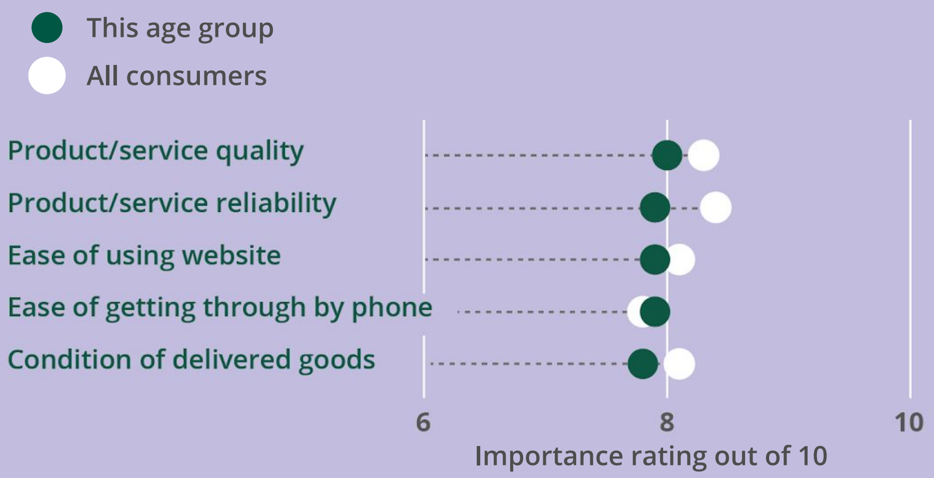


Priorities differ across age groups

People of different ages valued different aspects of service differently.

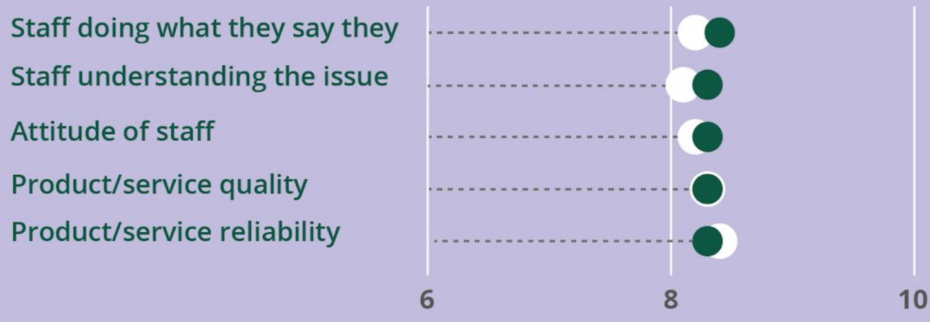
On average, consumers under 35s tended to rate all service areas as less important than other groups

Consumers under 35: most important aspects of service



Consumers aged 35-54 tended to care more about how complaints were handled

Consumers aged 35-54: most important aspects of service



Those over 55s tended to rates service as more important than other age groups, and particularly value reliable service.

Consumers over 55: most important aspects of service

Some people need more support

Overall consumers who identified a long-term illness, physical disability or mental health problems for someone in their household were more satisfied with their energy service than other households.

This is positive, but they were also more likely to want more proactive support from suppliers. In The Institute's quantitative research, the top 4 areas for improvement which were significantly more important for people who describe their activities as 'limited a lot' were:

1. Letting them know about cheaper tariffs
2. Help to manage payments
3. Help to find ways to reduce costs
4. Clear information about what services they offer, including additional support

They also put more importance on the company being friendly and helpful when they got in touch.

Our previous research has found that consumers with mental health issues can sometimes find themselves unable to be proactive in communicating to companies, struggle to understand their bills and forget information.[8] Suppliers should continue to develop processes that help consumers access flexible help to reflect the fluctuating nature of some mental health conditions.

In 2019, the independent Commission for Customers in Vulnerable Circumstances convened by Energy UK[12] called for energy suppliers to:

- End inadequate and inconsistent service
- Improve identification of customers who need support and reduce barriers to disclosing this information
- Provide effective links to third party support organisations and charities

The same year, Ofgem's Consumer Vulnerability Strategy 2025[13] called for similar outcomes, including:

- industry having systems to better tailor their service to consumers with specific needs
- consumers being able to make informed choices based on how suppliers will meet their needs

It's essential that suppliers now meet these challenges. One key step will be a strong package of voluntary measures as part of Energy UK's forthcoming Vulnerability Charter, with as many suppliers as possible signing up to these commitments.

Covid-19 has highlighted the importance of good quality data on consumer needs, in order to provide effective support to people who need it most. In future, more data sharing between essential services - and government - could improve delivery of support.

Opportunities to improve

The research also looked into where key opportunities to improve in the consumer experience were.

The themes considered were:

Ease: being able to choose how to manage bills and service

Contact: access to different methods to contact a supplier

Information: information provided on usage and charges

Knowledge: easy to understand bills and service, and how these compare to other suppliers

Innovation: use of technology to monitor use or generate electricity

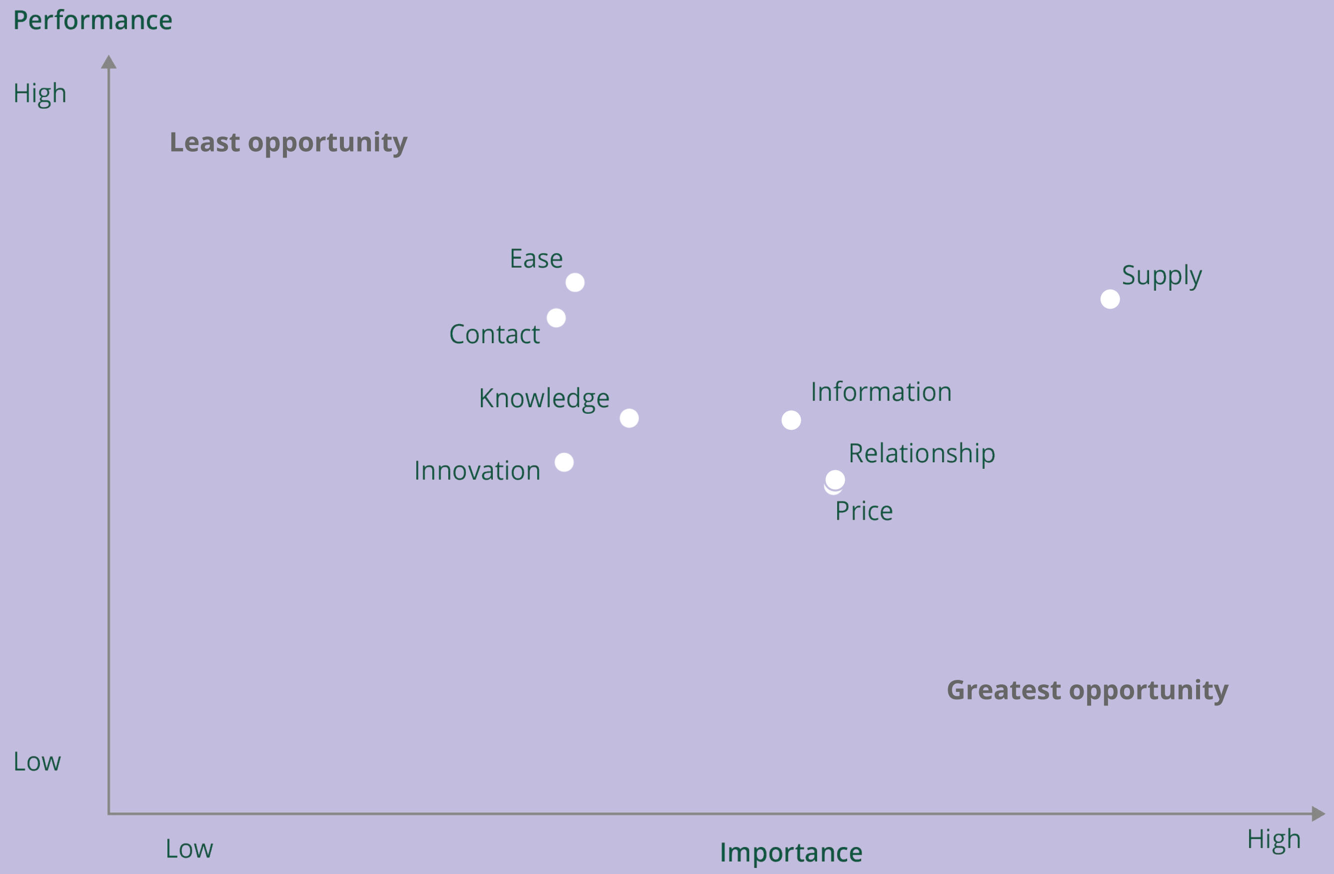
Relationship: quality of interactions and waiting times, rewards or incentives, and support for vulnerable

Price: cost of supply for different customers and communication of price changes

Supply: resolution of problems with supply and help with switching

Opportunity map for the energy industry

This shows the relative importance and current level of performance of the sector in the different themes in The Institute's quantitative research. Opportunities are greatest where themes are important to customers but performance in them is poor.



Opportunities to improve

The Institute's research showed 10 top opportunities customers identified for their energy supplier. These highlight 4 key areas for action.

Top 10 opportunities for energy suppliers

Provides me with information about how to switch	=1
Cares about me as an individual	=1
Makes it clear that I can easily switch if I want to	3
Informs me about ways I can generate my own energy	4
Let's me know how much energy I use at different times of day	5
Is friendly and helpful when I get in touch	6
I pay the lowest possible price for the energy I use	7
I'm rewarded for staying with my supplier with a good price	8
My supplier uses profits to lower prices for customers	9
I'm rewarded for staying with my supplier with discounts	10

4 key areas for action

- **Encouraging engagement**
- **Providing high quality, personal service**
- **Helping customers reach net zero**
- **Tackling the loyalty penalty**

Encouraging engagement

Energy suppliers are already providing information to encourage consumers to consider switching to a new supplier.

But this research shows a key opportunity to improve consumer experience is to go further in giving them more information about how to switch supplier.

In recent years Ofgem completed a series of trials to test prompts to engage and simpler switching processes.[14] It found that letters could be effective in prompting switching to a new supplier, with increased switching to new tariffs with the existing supplier also achieved.

Consumers in some of the trials were 10 times more likely to switch as a result of prompts

Ofgem also found that communications from a customer's existing supplier had more impact than Ofgem branded letters.

Although it seems antithetical to suppliers' interests, embracing these sorts of engagement measures could tackle the perceived lack of transparency and increase trust in the sector. This would benefit all participants in the energy market by helping to rebuild its reputation.

Switching was also still seen as complicated for some consumers in The Institute's qualitative research.

Ofgem's engagement survey[15] has identified similar issues - although there has been some progress in recent years

Percent of those who don't switch who say it's because it's too much hassle[15]

The introduction of faster and more reliable switching in 2021 is a key opportunity to provide a step change in the customer experience and perception of switching.

Suppliers and third party intermediaries (TPIs) like price comparison sites and autoswitchers need to work to ensure consumers are aware of these benefits, and to improve their own systems and processes to ensure that the consumer's experience of the end-to-end switching process is as positive as possible. We've previously called for TPIs to be regulated to ensure consumers are protected when using these services.[16]

To further simplify and enhance the switching process, Ofgem and suppliers need to work together to improve access to energy data. This will enable consumers to make quicker and more accurate comparisons - which are particularly vital when comparing smart time of use tariffs.

Providing a high quality, personal service

It's important that companies treat everyone as individuals. People want their interactions to be friendly and helpful, and for staff to simplify complex issues.

> **"The caller was in hospital for four months. He called his supplier and was given the wrong information about how much he owed. The agent was rude and impatient. The caller asked to complain but the agent told him 'it won't get you anywhere'."**

Case from the Citizens Advice Consumer Service

This aligns with Ofgem's move towards principles based regulation, under which suppliers are expected to consider how best to achieve positive customer outcomes, rather than just box ticking. To do this successfully, suppliers need to understand more about their customers' characteristics and preferences.

Industry experts in The Institute's qualitative research drew attention to the need for adopting customer centric approaches throughout an organisation, rather than just focussing on frontline agents.

Experts also acknowledged the pace of change in the market is accelerating, and that it is primarily the responsibility of industry to inform consumers about how these changes will impact them.

This will require companies to build closer, trusted relationships with their customers.

Examples of how suppliers already try to achieve these outcomes include:

- regular consumer panels
- focus groups on particular changes to products or company policies
- monitoring external feedback from Ofgem, Citizens Advice and the Energy Ombudsman
- modelling the impact of planned changes using data like Net Promoter Score

As suppliers increasingly transition to communications that are digital and partially powered by artificial intelligence, they must consider how to continue to provide personalised services through these routes, while also catering for those who prefer or need to make contact over the phone.

This is a challenging time for industry due to the financial impact of the Covid-19 crisis. It' is essential that suppliers' financial recovery is not based on reducing the service currently provided to their most vulnerable customers, or push customers into using channels they would prefer not to.

Helping customers reach net zero

Recent Citizens Advice research found that the majority of consumers are happy to make the necessary changes to their homes to reach net zero, but need more advice and support to do so.[17]

- 82% of people support the 2050 net zero goal
- 66% need advice or financial support to make their home more energy efficient
- 76% need it to switch to low carbon heating

While some of these changes may be a while away, many of the conversations about how to enable them are happening right now. We've set out principles for a future energy market[18] to guide this action.

As established names in this space, energy suppliers have an important role to play in providing this support. This research suggests that information and offers about how to generate energy (eg through solar panels) and more granular usage data would be welcomed by consumers and can play an important part in helping customers access cheaper and greener energy.

The Smart Export Guarantee is an opportunity for suppliers to engage with their customers about microgeneration, while the introduction of market-wide half hourly settlement will enable consumers to benefit from time of use pricing.

However, smart metering and renewable tariffs were generally viewed as less important by participants in the quantitative research. Furthermore, the qualitative research showed that consumers don't think they should bear higher costs as a result of decarbonising energy supply. Suppliers will need to develop attractive propositions that create value for consumers while decarbonising their energy usage.

The appetite among customers for knowing more about times of day when energy is used suggests there could be opportunities for suppliers to support customers as Ofgem facilitates more cost reflective electricity pricing. However, there are also risks, as some respondents in our previous research worried that time of use tariffs would be an excuse to charge higher prices.

> **"Yes, [you could move] your washing possibly, your dryer, but heating, cooking... You're not going to say 'Can you hang on an hour for your tea, kids? Can you hang on an hour for television?"**
>
> Quote from Future for All[19]

Suppliers also need to ensure that consumers feel able to trust green claims about products, so that trust is not undermined. In its recent decarbonisation action plan, Ofgem flagged concerns about 'green washing' and pledged to make sure consumers are not being misled.[20]

Tackling the loyalty penalty

Pricing is the area where UKCSI data shows customers are least satisfied with their energy.

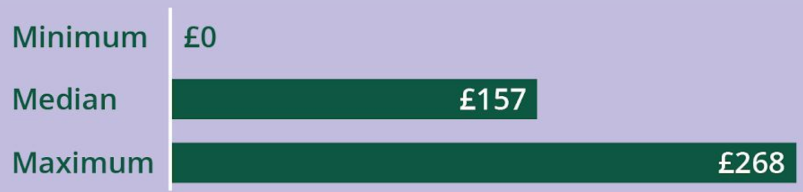
The Institute's qualitative research showed that price increases are a major cause of distrust in the market, with consumers feeling that energy companies make large profits at the expense of customers and "trick" customers into more expensive tariffs.

> **"Companies who offer to price match only when you complain... Why don't they offer the best price in the first place?"**

The price cap had only been in place a short time when the research was conducted and it may now provide some assurance to consumers, although only around one in five consumers are aware of the cap.[2]

However, despite the price cap, large differentials between large and medium supplier's best and default deals remain.

Difference between best and default tariff prices[21]



Alongside the price cap, companies can do more to help consumers feel confident they are getting a good deal with their existing supplier. Some suppliers only offer a single price to both new and old customers, while others have made pledges to remove all customers from standard variable tariffs onto rolling fixed term defaults that prompt more regular engagement.

Ofgem's communications principles also require suppliers to encourage consumers to engage with their tariff choices and be aware of the best deal for them.

The price cap is reviewed annually based on conditions for effective competition, and will expire in 2023. After it is removed it's important that loyalty penalty issues do not worsen. Our paper - **When the Cap No Longer Fits** - set out some of the pros and cons of a range of options for enduring arrangements. These include:

- Continuing the price cap in some form
- Opt-out and opt-in engagement measures
- Social tariffs
- Reforming the universal service obligation

It's vital that Ofgem plans how to protect consumers in vulnerable circumstances if the price cap is removed in the coming year.

Are the systems and policies in place to deliver good customer service?

Suppliers have an important role to play in meeting the challenges and opportunities we identify in this report. But the policy framework and industry systems and processes need to support good outcomes.

	In place	Underway	Unclear
1 Reputation	Standards of Conduct Informed choices principles Better performance data	Licensing reform and better compliance monitoring	
2 Complaints	Improved Energy Ombudsman systems		Reform of Complaint Handling Standards Simple process for bundled services
3 Communications channels	Standards of Conduct Communications principles		Retail market reform to build framework for innovative service
4 Meeting different needs	Vulnerability principle and strategy	Energy UK vulnerability commitment	Better data sharing on vulnerability
5 Engagement	Switching prompts Price comparison services	Engagement trials Faster, more reliable switching	Enduring engagement measures Improved data for switching TPI regulation
6 High quality, personal service	Principles-based rules based on characteristics and preferences		
7 Reaching net zero	Smart metering Elective half hourly settlement Innovation trials and sandboxes Smart Export Guarantee	Market-wide half hourly settlement Charging reform	Retail market reform to enable more innovation in energy products Ensuring green claims are accurate
8 Loyalty penalty	Prepay and default tariff price caps		Post price cap protections

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