Action for Warm Homes

NEA response to CMA energy market investigation: provisional findings and possible remedies

About National Energy Action

National Energy Action (NEA) is a UK fuel poverty charity. At the forefront of NEA's focus are 4.5 million low income households across the UK - struggling to afford the energy they need to heat and power their homes to a standard of adequate health and wellbeing.

NEA works to influence and increase strategic action against fuel poverty, develop and progress solutions to improve access to energy efficiency products and enhance knowledge and understanding of fuel poverty and energy efficiency to vulnerable households. Over 440,000 heating and insulation measures have also been installed to over 360,000 homes through NEA's Warm Zones subsidiary community interest company which delivers energy efficiency solutions and related services to low income households in deprived areas. We estimate these services have helped reduce fuel bills by a total of £38 million per annum, provided jobs and training for hundreds of unemployed people, provided major savings to the local health sector and stimulated local economies to a measure of £78 million each year. NEA also provides the secretariat for the All-Party Parliamentary Fuel Poverty & Energy Efficiency Group which helps to raise awareness of the problem of fuel poverty in Westminster and the policies needed to eradicate it.

Summary

NEA welcomes the CMA enquiry and believes it is an important exercise in seeking to re-establish consumer trust in the energy sector. NEA's particular focus is on vulnerable energy consumers and in particular those on the lowest incomes who struggle to pay for this essential service. Investigations to date have revealed evidence that the competitive markets are currently failing many low income energy consumers, particularly those using pre-payment meters (PPMs). Disappointingly, initial findings by CMA revealed that prices paid by domestic customers were £1.2 billion per annum above levels expected in a well-functioning market. There is therefore a clear risk that unless new safeguards and regulatory conditions are applied and enforced, energy prices will continue to have a disproportionate impact on poorer households, and low income consumers will continue to be least able to take advantage of effective competition. The outcomes of this review could further erode trust without effective policy proposals and delivery mechanisms to correct any adverse effects of competition (AEC).

Throughout this response, NEA therefore welcome specific and targeted attempts to address the poor outcomes of the competitive market to mitigate detriment particularly in relation to more disadvantaged domestic customers. We have therefore provided detailed comments in relation to the proposed remedies below. Furthermore, we note that whilst we support many of CMA's ambitions, some of the mechanisms outlined in the remedies we believe are not proportionate and will not alone address AEC. NEA also notes the following basic principles and recommendations which we feel should be acted on:

1. Boosting trust in the energy market (and in particular the large incumbent suppliers) is critical, especially in order to ensure low income and vulnerable households have the confidence to come forward and receive the assistance provided by the obligations placed on Britain's largest energy companies by the UK Government. Early findings that there has been no tacit collaboration to fix prices is a welcome start on that journey.

2. Competition has clearly not benefited all customers equally and energy prices continue to have a disproportionate impact on poorer households[i]. There are a number of reasons why the poorest have historically not been as engaged in the market, e.g. no better deals were on offer for PPM customers by most companies and new entrants as they were deemed to be lower value customers. PPM customers are also considered more expensive to serve and less likely to buy other products and services[ii]. The CMA enquiry provides a key opportunity to deliver these customers with the service and choice they deserve. In particular, NEA recommends that if a 'safeguard regulated tariff' is introduced for disengaged domestic customers, this should be provided only to disadvantaged disengaged customers through a safeguarding 'loyalty' rebate. This would be available to those on the Priority Services Register (PSR) for example, those in receipt of Warm Home Discount (WHD) or those customers known to suppliers to be struggling with their bills and using PPMs.

3. Whilst the premium PPM customers face compared to credit customers may have narrowed, very few PPM users have benefited from increased competition as few suppliers are seeking to attract PPM customers for this more expensive payment method. Ofgem's recent announcement to strengthen protections for PPM customers is therefore welcome[iii]. The CMA should state that the regulator must now act to end charges for installing and removing PPMs and end the use of security deposits and prescribe a timeframe. Ofgem reported an increase in forced installs of PPMs by some suppliers. The charges for these are often high and applied to a customer's account when more often than not these accounts are already heavily in debt. This can have a negative effect upon the lifetime of any debt and in some instances can be more than the original debt owed by the customer. We continue to be concerned about the appropriateness of these charges and hope the CMA and the regulator work together to ensure suppliers reduce the charges some customers face from paying for these costs.

4. Despite there being substantial savings available for PPM customers to switch to the cheapest direct debit (DD) tariff, the proportion of PPM customers that have never switched remains higher than DD customers. This is concerning and there is a pressing need for PPM customers to be able to benefit from savings available in the competitive market through switching to DD. Ofgem and the CMA must work together to remove any barriers preventing this becoming the norm once debt is repaid. Without taking these steps, NEA support a more deliberate policy intervention such as introducing a new licence requirement to remove any differential between PPM customers and the cheapest DD tariffs.

5. Greater clarity is needed in communications from the companies to their customers. We have started to see this following the Retail Market Review (RMR) and it was assumed that simplification under RMR would lead to more customers switching - which has also started to happen (simultaneously with a mix of more market entrants, Government grants for collective switching and commercial/community switching initiatives). The CMA needs to avoid unravelling this progress, particularly if the remedy to end simplification under RMR goes forward.

6. NEA believes reducing the overall energy bill through better engagement in the competitive market must remain an important part of the Government's strategy to alleviate fuel poverty. Third party intermediaries, particularly in the not for profit advice sector, can support this process through activities such as the Big Energy Saving Network (BESN). However, these key actors also need to be assured that regulatory requirements are in place to ensure clear and financial reporting on profitability is in place. This can help to rebuild trust in the market through greater levels of confidence that markets are working in the best interests of customers and not just shareholders. The CMA must also clearly state that it is the responsibility of Government to explain how government policies are impacting bills with a greater degree of accuracy. We would therefore expect the CMA to recommend there should be clear procedures between the independent energy regulator and DECC to review the impact of policies without the need for recourse to an adjudicator to deal with disagreements, and that the statutory duties of the regulator enables it to continue to protect vulnerable customer interests as well as promote competition as a primary purpose.

7. Beyond the CMA enquiry, NEA believes that additional support can be provided to disadvantaged households via existing mechanisms, such as rebates under WHD. However these types of policies need to be designed to cost effectively reach the target households and that the costs should be limited as this type of levy can negatively impact a wider cohort of ineligible households on the brink of fuel poverty. NEA also believes that support should continue for certain groups under WHD beyond current regulations running up to March 2016, and whilst this is a separate matter outside the specific CMA enquiry, it will inevitably be considered by DECC alongside the CMA report and therefore it is important to highlight here.

Response to possible remedies identified by CMA

Remedy 3 - Remove from domestic retail energy suppliers' licences the 'simpler choices' component of the RMR rules

a) Energy retailers have been concerned that the current rules which limit the number of tariffs they can offer under RMR has restricted their ability to offer customers new beneficial offerings. That may be true. However, before lifting any current requirements and potentially opening up the market to a proliferation of tariffs once again, it is important to understand the impact this could have on the second goal of engaging customers.

b) Before RMR there was strong evidence that due to the range of tariffs on the market customers were switching to worse deals because they could not easily benchmark and compare the myriad of tariffs. The types of tariffs were not generally well understood and were confusing. It would be helpful for tariffs to fall under agreed categories/bands to ease comparison. For example, higher user/average user/lower user with the differentials in payment methods set out. NEA also believes Ofgem should require the companies to bring forward socially progressive tariffs to ensure poorer customer groups do not get left behind.

c) The smart meter roll out does offer the opportunity for time of use tariffs but there needs to be clear information about the penalties as well as the incentives these tariffs will bring. For example, extensive research around Australian smart metering and the Victorian roll-out[iv] points to the risks of time of use pricing disadvantaging vulnerable households who are at home during the day (peak periods), have inelastic and little discretionary energy usage and may be disadvantaged through any increase to fixed standing charges for electricity. NEA therefore believes the introduction of time of use tariffs should be carefully managed and monitored by Ofgem and customers must receive advice on how to maximise the benefits and avoid any penalties.

d) The CMA should require Price Comparison Websites (PCWs) to provide a link to an independent Ofgem/Citizens Advice price comparison site before allowing customers to click and switch. That site should sign post/provide links to all other registered PCWs and advise customers to check out two or three PCWs before switching. All sites should also inform customers of the other benefits of some suppliers' offerings that help reduce overall energy bills, e.g. access to WHD and the Energy Company Obligation (ECO). NEA believes this latter step is essential and must be stipulated by CMA in their final proposals. Finally, PCWs should also be required to reveal which companies they have deals with and those they do not.

Remedy 4 - Possible measures to address barriers to switching by domestic customers

a) As noted above, before switching it is critical that customers be made aware that their new choice could limit or stop them receiving wider benefits from their incumbent supplier, e.g. forgoing eligibility for WHD. NEA again reinforces that this step is essential and must be stipulated by CMA in their final proposals.

b) As a general principle, customers must give their approval for PCWs to access data on their behalf, rather than automatic access to information via ECOES database. It is not currently clear that there is material benefit to the customer prior to access and there should be such a material benefit established prior to any automatic transfer of data.

c) There may be good reasons why delays occur in switching customers within the mandated number of days. However, these should be reported as exceptions. Penalties should be proportionate and in line with licence condition requirements. Rather than a penalty in the first instance, the customer detriment should be addressed through an adjustment to the customer bill. Persistent offenders should receive a penalty if this also impacts other suppliers, paid into a fund for customer benefit administered by Ofgem.

d) Cooling off periods must be allowed, with NEA supporting seven working days. This will enable relatives/carers to check any transfers entered into by vulnerable customers.

e) Social housing tenants and more vulnerable customers in private rented accommodation have been less likely to switch than other groups/tenures. There is an increase in the number of social housing providers seeking better deals for their tenants and a small number of new suppliers seeking to attract these tenants. However numbers remain low and more could be done via BESN and Energy Best Deal to support those tenants navigate the switching process. In addition, community events and more bespoke approaches to win confidence and deal with other symptoms of AEC will be needed.

Other remedies linked to smart meter roll out

a) PCWs should only be able to access Midata following customer permission.

b) NEA agrees with the CMA that the introduction of smart meters has the potential to help customers to become active users of energy and hence have the motivation to engage in the competitive market to switch and make savings. However 'smart as a remedy' hinges on customers having the information and support available to become proactive users of their smart meter. This requires a roll-out that engages customers at all stages of the smart meter journey, from hearing about a smart meter to installation to behaviour change. In this regard, NEA applauds the Government for setting in place conditions (e.g. Smart Energy GB, the Smart Meter Installation Code of Practice (SMICoP)) that prioritise the customer experience. We continue to have concerns however that within the current regulatory landscape opportunities may be missed to use the roll-out (and the face-to-face in-home contact with a customer to install a smart meter) to deliver a tailored experience that addresses the customer's specific smart metering and energy needs. These concerns particularly relate to vulnerable customers who will require more targeted and intensive support to overcome their evidenced disengagement in the energy market and address issues around age, health, disability, visual and hearing impairment, low literacy and numeracy and English language skills. These points are supported by DECC's findings from their early learning research on smart metering which concluded that certain categories of consumers (including low income, prepayment and those vulnerable due to age, literacy etc.) would benefit from tailored, follow-up (including face-to-face) support to ensure they are able to fully realise the benefits of smart meters[v].

c) NEA therefore stresses in response to CMA's question at paragraph 60B that vulnerable consumers will require tailored information and guidance, including in-home support, to understand and benefit from their smart meter and in-home display.[vi] NEA believes this should take the form of some kind of 'extra help' for vulnerable consumers above that currently dictated by licence conditions. In particular, we stress the opportunity to use the installation contact point to deliver a tailored holistic journey for vulnerable customers that links smart metering up with other advice and support schemes (e.g. ECO, WHD) and delivers targeted aftercare and behaviour change products. We have set out these views and considered options in more detail in work carried out for Citizens Advice.[vii] It should be noted that while, to a degree, Smart Energy GB's planned outreach approach is well placed to offer this kind of bespoke support, suppliers themselves will have a critical roll in offering tailored advice at point-of-install.

4b) It is not clear why one company was allowed a derogation to the requirement to undertake meter checks every two years. This seems like an anomaly that should be corrected over a reasonable period to allow them to gear up to the frequency of checks required by other companies and build into plans for the smart meter roll out. Further work should be done to review the need for two year checks during the foundation stage of smart meter deployment

Remedy 5 - Prioritise PPM customers during smart meter roll out

a) NEA has advocated that PPM customers should be among the first to benefit from smart meter roll out. Clearly all technical issues must be addressed first but it would be perverse that those customers who could potentially gain most from roll-out still be provided with a dumb meter and then end up last in the queue for a smart meter. Prioritising these customers (living in properties not listed as second homes) would go some way to addressing the higher costs they have faced over the years, and allowing access to credit facilities more easily and without needing to pay for a new meter to be installed.

b) CMA's 'Option A' seems to be a simple and proportionate measure, but alongside this suppliers should publish plans on how they can cost effectively prioritise existing PPM customers through their roll out into specific areas.

c) Promotion of 'pay as you go' tariffs could be enhanced and all suppliers required to offer these via PCWs.

d) Suppliers and installers must be geared up to offer extra support and assistance for PPM customers who have been identified by DECC's early learning research (cited previously) as requiring additional and tailored support on smart metering. As also noted above, NEA recommends that this support aligns with other licence objectives to assist vulnerable energy consumers (many of whom use PPM facilities) so a third party or supplier offers smart advice as a package together with (as appropriate) PSR services, WHD check, energy efficiency support and energy debt assistance. Above all we stress that the roll-out's once-in-a-generation chance to visit every home in the nation should not be missed in terms of reengaging those isolated and/or disinterested energy consumers.

e) The roll out of 53 million meters by 2020 already imposes a major challenge on the suppliers. To maintain customer confidence the pace must ensure high quality customer care. Gearing up for an accelerated timescale may be difficult and ultimately detrimental to the customer if neither the product nor service are optimal

Remedy 6 - Ofgem to provide an independent price comparison service

It is estimated that in Great Britain, 22 million households (84%) had internet access in 2014. Of the four million households without internet access, 32% indicated that this was due to a lack of skills. Further barriers included equipment and access costs (12%). Those that do not have access to the internet will not engage in the energy market via a PCW or Ofgem site. However these sites can be used by frontline advisors who can aid switching for older or digitally excluded households, and they would certainly benefit from an independent, not for profit service designed to compare prices. With regard to an independent comparison service:

a) NEA believes it would enhance trust and confidence amongst the advice community; giving them greater confidence that they are providing reliable advice that can be easily verified.

b) A phone service and outreach service should also be provided.

c) The service may undermine commercial PCWs, however that could be to customers' benefit. It is not proposed that it would offer a switching service but, as now, some customers will inevitably go direct to a supplier's site to switch rather than through a third party. Ultimately it would be in customers' interests if this service could be run more cheaply than commercial enterprises and replace the plethora of PCWs charging £30 on average per switch.

d) All offers should be listed.

e) There would need to be a regulatory requirement to provide information to the regulator.

f) It should not be transactional.

g) Funding would need to be provided via the energy suppliers. An alternative to Ofgem providing the service might be Citizens Advice which has a trusted national brand and is accessed already by significant numbers of people.

h) PCWs must provide links. It could be actively promoted via other front line agencies and networks.

Remedy 9- measures to provide additional or different information to reduce barriers to accessing or assessing information

a) Under RMR's 'Treating Customers Fairly' agenda there has been significant consideration of how information should be provided on customer bills. Despite this, Ofgem still require some information to be included which customers find difficult to understand and the way it is presented is often confusing. Customers have indicated (during workshops and discussion groups facilitated by NEA) that they would like a reduced amount of information on quarterly bills with an annual statement which provides more details. More complex calculations can be provided in appendices. The bill should communicate what the customer is being charged and over what period. Other communications can be provided in a different format, and via other media.

b)

c) Texts and alerts to ask customers to provide meter readings can work, and especially where there are cost saving incentives to do so. However some customers are unable to reach or read their meters and rely on a physical meter read. This should be captured on PSR and more regular home visits scheduled. When smart meters are fitted it will be important to endure that IHDs are located where customers can easily access them.

d) Customers must be informed that their contract period is coming to an end in time for them to consider next options. Customers on PSR should have longer periods of time, should be encouraged to ring or speak to a carer/relative/advisor but also informed of the best tariff available in the future from their provider.

Remedies 10 and 11 - Measures to prompt customers on the default tariffs to engage in the market and a transitional 'safeguard regulated tariff' for disengaged domestic customers

a) Mitigating detriment to sticky customers through a safeguarding tariff is appealing as it could be easily and automatically applied to the 40% or so customers who do not switch their tariff or supplier. While it would reduce their overall fuel bill it does mean conceding that the competitive energy market is not functioning for all. Furthermore, it may also make some customers even less inclined to engage (if they have access to a good deal regardless of inaction on their behalf). It will therefore benefit the apathetic who can afford their bills as well as those who genuinely find it difficult to navigate the market and switch.

As a result, NEA recommends that if a ‘safeguard regulated tariff’ is introduced for disengaged domestic customers this should be provided only to disadvantaged disengaged customers through a safeguarding ‘loyalty’ rebate. This would be available to those on the PSR for example, those in receipt of WHD or those customers known to suppliers who are struggling with their bills and are on PPMs.

b) In addition to a safeguard tariff, there may also be more effective means of reaching those who are genuinely unable to access the market easily, for example through an enhanced BESN. The network provides assisted support to help lower fuel bills through much fuller engagement with the market to access not just a better tariff, but also ECO measures, PSR services, renegotiation of debt repayment plan terms and other advice and support.

c) There is also a huge opportunity from next year with the roll out of smart meters to engage more actively with disengaged customers through an extra help service for vulnerable consumers. This will be needed to ensure customers reap the benefit of smart meters, specifically, the enhanced access to tariff and payment method switching.

d) Fundamentally, more detailed advice and support to switch and make behaviour changes will always be needed to guide vulnerable customers through the dynamic energy retail market. Automatic rebates and discounts are an element of the support we should be providing, but this should be accompanied by mechanisms to empower customers to take control of their energy usage.

e) Customers should receive regular prompts about the end of a contract period or if they have never switched. However, customers may become even less likely to engage if they feel hounded. Unsolicited approaches and cold calling should be discouraged but there are opportunities that suppliers already take when customers inform them they are moving house for example.

f) Data should not be shared to TPIs about customers who have not switched.

Remedy 13 – Requirement to agree binding commitment to half hourly settlement for domestic electricity meters

a) A move to half hourly settlements could help stimulate new time of use tariffs and from research undertaken with Northern Powergrid under the Low Carbon Network Fund it is clear some customers could benefit from these if they are provided with detailed advice on behaviour changes needed to achieve the benefit and avoid any penalties.

b) Some households would find it more difficult to respond and change pattern of usage (families with young children for example) but in order to maximise new generation patterns some incentive tariffs will be needed and all customers should be assisted to understand how they can benefit.

c) Further trials are needed before any early roll out but this could happen prior to 2020.

Remedy 14 – Improve financial reporting

a) It is important that Ofgem and therefore customers have confidence in the financial reporting provided by energy companies. NEA has no comment on the precise way in which this should be done.

Remedy 15 - Communicating impact of policies on bills

a) Final energy bills include wholesale energy commodity costs, transmission and distribution network costs, metering and other supply costs, supplier margins, VAT and the impacts of social, energy and climate change mitigation policies. In recent years, wholesale commodity prices have been the principal reason for domestic price rises. Recent rises have also been driven by increases in taxes and levies which are recovered from energy bills to fund programmes instead of being funded out of direct taxation; a more progressive method. The Government have a stated responsibility to ensure "the costs and benefits of our policies are distributed fairly so that we protect the most vulnerable and fuel poor households". There is therefore some assessment by Government on the impact policy costs have on consumer bills however this assumes coverage of some policies are greater than they are[viii] and does not highlight the disproportionate effects on domestic electricity customers that are reliant on electricity as their main heating fuel.

In addition, where companies are obligated to deliver outcomes cost effectively in a competitive market there has been no requirement to be transparent on the actual costs as opposed to the Government's modelled/assumed costs. NEA advocates that companies should provide this information to Ofgem. Meanwhile, NEA also believes the UK Government must report accurately on the extent to which domestic energy consumers contribute to Treasury revenues. NEA estimates that over the term of the UK Parliament domestic energy consumers will contribute over £14 billion to the Treasury (£11.82 billion in England, £1.33 billion in Scotland, £690 million in Wales and £190 million in Northern Ireland) through VAT and revenue generated from carbon taxes.

b) Consumer groups are currently unable to scrutinise the policy cost assessments due to commercial confidentiality. Average costs are shared on some customer bills/company websites but without clarification on the reasons for the policies there is a danger of customer backlash.

c) See paragraph 15b above.

d) Customers need to have confidence that decisions are taken in their long-term interests. This should mean that affordability, security of supply and action to reduce carbon to meet internationally agreed targets are under constant review and are being delivered cost effectively on their behalf by obligated parties. No one agency has all of the responsibility to communicate complex trade-offs but a more concerted communications strategy following the autumn review of policy costs will be needed by Government, Ofgem and the energy suppliers.

e) Think tanks already scrutinise any published modelling and undertake impact assessments. The Climate Change Committee performs a statutory role in assessing carbon reduction costs and the impact on different customer segments (particularly fuel poor). Furthermore, the new Fuel Poverty Advisory Group for England must be resourced to provide analysis of the cost/impact of social obligations.

f) No. This should be done by DECC and its agents.

Remedy 16 – Ofgem duties to promote effective competition

a) NEA believes that Ofgem duties to protect vulnerable customers should be retained and enhanced and that this can not necessarily be done solely through more effective competition but can be delivered by a Government agency with a wider set of social and environment duties.

Remedy 17 – Mechanism to settle disputes between DECC and Ofgem

a) It must be understood that Ofgem currently provides a joint role as an independent regulator, accountable to Parliament (not the UK Government) and also has an administrative role to support the delivery of an increasing number of environmental and social policies (FIT, RHI, ECO, WHD). NEA believes as an independent regulator Ofgem must be allowed to challenge Government and perform a policy advice role to DECC. As an agent for administering policy programmes it is also uniquely placed to provide insight into the costs and any delivery issues encountered. Ultimately however it must be for DECC to decide how it wishes to implement its policies and it would be unwise to establish an intermediary. NEA believes it should continue to publish guidance to the regulator but should not interfere in Ofgem decision making processes. As noted above, it is very important Ofgem is, and is seen to be, independent of Government. With this in mind, any disputes should be transparent, published and made publicly available to public bodies and Parliament (perhaps in the annual report by DECC to the Energy and Climate Change Select Committee for independent scrutiny by the Committee).

Further information and sources

[i] Under the Low Income High Cost (LIHC) definition of fuel poverty in England, the depth of fuel poverty amongst these fuel poor households is also measured through a 'fuel poverty gap'. Unlike the overall headcount measure under the LIHC definition, the fuel poverty gap indicates the impact energy prices have on the depth of the problem (for those households on the lowest incomes and with high energy costs). This can be summed for all households that have both low incomes and high costs to give an aggregate fuel poverty gap. This represents the difference between the required fuel costs for each household and the median required fuel costs. The current fuel poverty gap is around £900 million per annum. Whilst this is mainly due to poor standards of housing occupied by the poorest three income deciles and low levels of income, the impact of higher than average energy tariffs is also a contributory factor to fuel poverty.
[ii] Weak customer response may be due to factors that the competitive market is not well placed to fix. For example, access to the internet, lower levels of literacy and numeracy and chaotic lifestyles. It is also linked to market conditions, e.g. good customer service is valued and brand loyalty and local/national association may be preferred by those less likely to access other services online. However, the impact of rising customer complaint levels (after price controls were lifted and for reasons including poor data migration following systems upgrades, miss- selling and billing confusion following sharp energy price rises from 2005-12 that customers had been unable to budget for) has also played a key role in developing an increasing sense of apathy within the energy market.
[iii] *Prepayment review: understanding supplier charging practices and barriers to switching*, Ofgem, 25 June 2015.
[iv] May Mauseth Johnston (2010). New Meters, New Protections: A National Report on Customer Protections and Smart Meters. ACT: St Vincent de Paul Society National Council.
[v] Department of Energy and Climate Change (2015). DECC's Policy Conclusions: Early Learning Project and Small-Scale Behaviour Trials. Available: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/407539/1_Early_Learning_Project_and_Behaviour_Change_Trials_Policy_Conclusions_FINAL.pdf.
[vi] NEA stresses that in the context of the smart meter roll-out being used to help remedy customer disengagement in a competitive market that the licence requirement for suppliers to offer customers an in-home display (IHD) at point-of-install is critical and must remain in place. It is the IHD, not the smart meter, through which customers engage with their energy use and cost information. Furthermore, the provision of IHDs has been found by DECC's early learning research to be a key factor in helping customers increase awareness of, and control over, energy use in the home. Available: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/407539/1_Early_Learning_Project_and_Behaviour_Change_Trials_Policy_Conclusions_FINAL.pdf.
[vii] NEA for Citizens Advice (2014). Developing an Extra Help Scheme for Vulnerable Smart Meters Customers. London: Citizens Advice. Available: http://www.nea.org.uk/policy-and-research/publications/2014/extra-help-scheme.
[viii] DECC's estimated impacts of energy and climate change policies on energy prices and bills report assumes that tighter efficiency standards for household energy appliances are expected to deliver an average annual saving of around £158 per household in 2020 (including around £25 per household through more efficient TVs and set-top boxes, £25 through more efficient consumer electronics and around £20 through more efficient lighting). Many stakeholders have questioned the extent to which products policy will deliver these assumed savings, in particular the ability of low income households to realise these savings, as they are unlikely to be able to afford to upgrade their appliances and white goods over this period without a capital grant.