



*A grassroots campaign taking action against mammoth fuel bills and working towards an affordable, sustainable and democratic energy system*

Email	<a href="mailto:fuelpovertyaction@gmail.com">fuelpovertyaction@gmail.com</a>
Website	<a href="http://fuelpovertyaction.org.uk">fuelpovertyaction.org.uk</a>
Facebook	<a href="https://www.facebook.com/fuelpovertyaction">/fuelpovertyaction</a>
Twitter	<a href="https://twitter.com/fuelpovaction">@fuelpovaction</a>

## **Heat Trust further consultation on Metering, Billing and Guaranteed Service Payment, September 2021**

MOD014 We support the proposed change to ensure that “Where meters have Automated Meter Reading functionality Registered Participants must take reasonable steps to use an actual meter reading for every Heat Bill issued.”

We propose an additional amendment to ensure that where a customer is unable to provide heat meter readings, and Automated Meter Reading is not available, the Registered Participant must send a meter reader at least four times each year.

### MOD015

We strongly support the proposal to reduce the commencement hour for Guaranteed Service Payments from 24 hours to 0. But we would amend the timing to start from the commencement of the actual fault rather than from the first time a customer notifies the supplier of it. The supplier must be able to consult its own data to record the start of the interruption and make this the point from which payment commences. It is not customers’ job to continually monitor and notify the supplier of any problems; particularly at night no one should be required to do this work. Customers should also have a right to see the data on supply interruptions available to the supplier.

Meanwhile, the end of an interruption must be counted as the time when customers receive full service -- eg hot water at its normal temperature -- rather than the time when the source of the problem is repaired, for instance in the plant room, as it can take some time for normal service to resume.

As you know we also believe the 24 hour threshold is far too high.

We also support the requirement of a longer notice period for planned interruptions, in line with Ofgem.

### MOD018

We support the proposal to compensate failure to notify customers of a planned interruption, and failure to keep an appointment. In the latter case, however, there must be further provision for repeated failures. Where repeated visits to a customers’ home are required due to an unresolved technical problem or failure to attend the first time (eg more than two visits scheduled in any 6 month period), any further requirements for access must be arranged at a time convenient to the customer, even if this falls outside working hours, in order to safeguard customers’ employment. £30 is not much compensation if you lose your job because the heat network is not working properly or because, as so often, the contractor does not turn up on time or turns up without the right specifications, expertise, or equipment.

While it is less important than the above, we do think failure to provide Guaranteed Service Payments on time should be compensated. The process of getting any recompense for what you suffer can be extremely stressful, and when payments are delayed it inevitably raises a worry that you will not be paid at all, and gives the impression that customers' needs are not actually a priority for the supplier.

#### MOD019

We support the proposed changes, as they will somewhat increase transparency in billing, but note that the actual charges will remain mysterious without more fundamental changes, and the ability to compare all elements across different heat networks and with gas and electric alternatives.

Philippa Marks, of The Exchange development in London SE16 (also known as Grange Walk) notes that customers often do not know what metering and billing fees actually cover. The lack of transparency paves the way for people being charged exorbitant amounts for nothing much. She writes:

*"The admin fees of the billing company seem excessive and are often higher than the heat used in summer. It seems these fees are purely for the company taking the meter readings (electronically) and emailing a bill, as all the standing charges for delivery and actual heat used are all charged separately. If the meters break or run out of battery, we are also charged for this separately, so it is not covered by the 'admin fee' either."*

Beyond the transparency issue, this supports a position that administration fees should be capped. Making meters obligatory has added hugely to the costs of District Heating, as metering and billing forms a substantial component of customers' bills.

#### MOD020

We don't have strong feelings about the replacement of indexing Guaranteed Service Payments with a three year review. But there are much more basic issues about the amount of the payments. For instance, they should not be capped, at £500 or otherwise. Some problems are very long-lasting, and at present customers are paying the price for this, including with their health, education, relationships, and more. If guaranteed service payments cease, how are they expected to be able to afford alternative forms of heating? We know of too many cases where residents have been forced to abandon their homes and stay with relatives (while still paying rent, and heat network service charges) because they cannot afford to heat them. And many have nowhere to go.

Similarly, £54 is very little recompense for frequent loss of heat and hot water lasting a whole daytime period, so you never know if you will have a supply or not. Who would choose to live in a home with such an unreliable system, or consider it acceptable for such a paltry recompense?

OTHER RELATED ISSUES raised in this consultation process but not included under the headings above:

Heat controls must be suitable for the customer, taking account eg of their manual dexterity, access, and vision, and must permit independent control of heat in different rooms.

Customers should be fully instructed in their use, including being shown on site where desired.

Customers should always have a choice between credit and pre-payment metering.

Payment of guaranteed service payments should be automatic, and should not require applications. Where evidence is required, it must be reasonable and must not include evidence of increased spending on alternative sources of heat: many customers do not have the money to spend on alternatives and therefore do not do so. They go cold.

Customers must be offered the choice of receiving their guaranteed service payments in credit or in cash.

4 September 2021