



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

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Heat Trust metering and billing and GPS consultation November 2020

Q 2 MEDIUM

Without good controls, heat, energy, and money are wasted, the carbon-reduction purpose of installing DH in the first place are frustrated and people are financially burdened and/or cold. Whatever the legal responsibility, it should be required good practice for Registered Participants to ensure that controls are not only present but effective, and, for instance, allow rooms to be separately controlled. We have seen residents frustrated by a system where they cannot heat their bedrooms without overheating the lounge. TRVs would solve this but have not been provided. In addition, it is essential to ensure that people actually know how to use their controls and that the controls are correctly sized, designed and placed so that they are not physically or digitally inaccessible

Q5 LOW

Yes, why not?

Heat customers have for years been crying out for a way to compare their bills with those of others on different heat networks, including standing charges. Ofgem has worked to ensure that bills are comparable across gas and electricity suppliers but with heat, there is no equivalent transparency. We have seen acknowledgements (after resistance) that this is perfectly practicable. For any serious effort to ensure bills are fair, this is basic, even if it means that some tariffs are restructured, or a conversion tool has to be supplied. A comparison table should be on the Heat Trust website.

Q6 MEDIUM

Yes, this is not only in case the AMR function fails, but to allow people to keep track of their usage, and also to enable them to spot if something in their system or in the metering is going wrong.

Q7 HIGH

Once a year is far too infrequent. Once a quarter would be much better. Where there is AMR surely a monthly statement should be automated and not impose additional costs?

Q 9 MEDIUM

Yes. Please note:

- a) Different tariffs for low and high users can be very helpful to people seeking to control their bills. Obviously, it is essential to inform people of these options (strangely, this cannot be assumed).
- b) The Ofgem requirements can and should be applied here too.

- c) Charging prepayment customers more and charging direct debit customers less are both regressive, penalising people for having trouble paying their bills, and rewarding those whose bank balances are healthy enough to support direct debit. In addition, people can have prepayment meters forced on them against their will. We believe people should be charged the same regardless of payment method.

Q10 MEDIUM

Yes.

Q 13 MEDIUM

Absolutely yes the information must be required, and absolutely no the time limit should not be reduced. There are cases (including with Registered Participants) where absolute chaos in the billing system has been allowed to continue for years, and it is a long and painful process for customers to find out what has happened. Including sometimes being billed for the period when their home and the estate were being built (before they moved in). No further obstacles must be put in their way.

Q 14 LOW

Yes.

Q 15 MEDIUM

Where it IS possible to switch, the information should be provided on procedures for removing or resetting a PPM. And again, if people cannot switch to a credit meter, they should not be penalised financially (via higher tariffs) for their lack of choice.

Q 16 HIGH

The current Ofgem requirements for gas and electricity suppliers would be a step forward for heat networks. Prepayment meters, while wanted by some customers, always pose the risk of people being cut off because they cannot top up, even in an emergency (eg illness). We therefore think they should be avoided except in cases of explicit demand from customers, with a risk assessment.

Q 21 HIGH

Commencement at hour 0 could be disproportionately costly in terms of administration. For the first hour or two, a home will not usually get too cold and there should be some remaining hot water. But 24 hours is far too high a bar -- the additional cost burden on customers, and the pain and suffering begin long before that.

Q 22 HIGH

Yes, it should match. Particularly important is Ofgem's proposed removal of the cap. Some outages are very long-lasting and present real problems for customers' ability to keep warm. What are they supposed to do after the cap is reached?

Q 24 HIGH

Yes, if outages are planned, there should be no reason for withholding the information from people who may need to plan their own lives around it. Seven days should be a minimum with encouragement to give longer notice and reminders. And payments should be aligned.

More importantly, however, compensation for planned outages should be brought into line with compensation for unplanned outages, especially if they are prolonged (over a few hours) or repeated. People still need to know they will be compensated so that they can use alternative heat sources as needed without being concerned about the bill.

Q 25 HIGH

Yes to both questions. And as above, this should reply to both *planned and* unplanned outages, and when the two combine.

However while this is being considered, the time limit for the length of outages should be reduced to 1 hour. As noted by Kwasi Kwarteng in his recent letter to HNIC, frequent short outages are a serious problem. They may, for example, occur every day just when everyone needs a shower in the morning before going to work.

In addition to helping customers, the compensation system should provide an incentive to heat providers to get their networks working consistently. Otherwise it is much more profitable just to allow intolerable unreliability to continue year after year.

Q 26 HIGH

Yes. In many cases, it is the network itself that is at fault. And where it is, eg, water pressure, the heat provider should seek their remedy for repeated failures from the responsible party..

Q 27 HIGH

Yes.

Q 28 HIGH

Yes, but parity with Ofgem demands 4 hours, not 12. You can get very cold in 12 hrs.

Q 29 MEDIUM

Absolutely. Firstly, many people cannot show increased bills because they do not spend the money they do not have (if they are on a prepayment meter) or cannot count on (if on a credit meter).

The most unjust obstacle put in the way of some customers is a demand for proof of how much more you have spent due to having to use alternative heat sources. This is very hard to gather, -- even if people weren't under stress, time poor and in bad situations, it is not straight forward to do. Comparison with other years does not work if you are in a new flat, or the weather or your family size or circumstances have changed and in some cases there is no year with reliable district heating to compare to.

Q 30 HIGH

Yes to both: Customers must be notified when they are eligible for a GSP, and it must be made automatically where eligible? We have to be able to count on this money so we do not go cold in the winter.

Q 31 MEDIUM

Yes, as per Ofgem provisions - these payments can be urgent. Ten days is the maximum

Q 32 MEDIUM

Yes, a sanction would encourage prompt payment.

Q 35 LOW

There should absolutely be a GSP for when appointments for home visits are made but not kept. It is entirely unjust even when it happens once, and some people suffer this repeatedly. No one should be taken for granted in this way. Basic respect is a minimum.