



Consumer Outcomes Call for Input and Guaranteed Standards of Performance Review END FUEL POVERTY COALITION RESPONSE

22 January 2026

The End Fuel Poverty Coalition is a [broad coalition of around 100 anti-poverty, health, housing and environmental campaigners, charities, local authorities, trade unions and consumer organisations](#). It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

The End Fuel Poverty Coalition is concerned that the Consumer Outcomes Call for Input is framed around an untested assumption: that existing supply licence conditions are unnecessarily prescriptive and are holding back supplier flexibility.

We do not believe this claim is evidenced in the consultation, and **we strongly oppose any move to weaken or replace binding licence conditions** on this basis. There is no analysis presented to show that current rules are a barrier to innovation, nor that their removal would benefit households.

What there is, instead, is a growing body of evidence of persistent service failures across the energy market, particularly for people in fuel poverty, those in debt, disabled people, carers and prepayment customers.

From the perspective of organisations working daily with households in cold, damp homes, the central problem in the energy market is not over-regulation, but under-delivery and weak enforcement. People continue to experience inaccurate and infrequent billing, long-running errors, inconsistent treatment when they fall into debt, poor recognition of vulnerability, barriers to third-party advocacy, and serious difficulties contacting suppliers or resolving complaints. These are not one off issues; they are systemic and recurring.

Against this backdrop, shifting towards a more interpretive, outcomes-based framework risks increasing subjectivity, weakening accountability and making it harder for consumers and advisers to challenge poor practice. Introducing broader outcomes without first demonstrating a step-change in Ofgem's supervisory and enforcement capacity would be likely to increase, not reduce, consumer harm.

We are therefore clear that existing prescriptive licence conditions, particularly those relating to billing, back-billing, debt, affordability, prepayment meters, vulnerability and communications, must not be removed or diluted. Any evolution of the regulatory framework must start from the reality that suppliers are still failing to comply consistently with basic protections, and that enforcement action is often slow and opaque. The priority should be to strengthen supervision and enforcement, not to remove the guardrails that vulnerable consumers rely on.

However, we do see real potential in reforming and expanding the Guaranteed Standards of Performance (GSOP) as part of Ofgem's regulatory toolkit. GSOPs provide a credible way to embed the fundamentals of acceptable service across the market: accurate and timely billing, prompt correction of errors, regular meter reads for vulnerable customers, timely delivery of Ombudsman remedies, proper recording of nominated advocates, and compliance with protections on back-billing and involuntary prepayment meter installation. These are the practical building blocks of a functioning retail market, yet they are still not being delivered consistently.

Stronger GSOPs, backed by automatic financial payments each time a failure is recorded, could systematise these basics and create clear operational incentives for improvement. An automatic payment every time a breach occurs, appropriately maintained over time and capable of repeating where failures persist, would send a much stronger signal to suppliers than the current framework. Crucially, GSOP compliance and payments must be automated and transparent, not dependent on consumers knowing their rights, identifying breaches or pursuing redress. For households already struggling to heat their homes, protections must operate by default.

If Ofgem wishes to continue developing consumer outcomes, we believe these should initially be used to support transparency, accountability and performance benchmarking, rather than to replace binding protections. They should reinforce, not substitute, clear licence conditions and strengthened GSOPs, and should be accompanied by published supplier-level reporting so that outcomes for different consumer groups, particularly those in fuel poverty, can be properly scrutinised.

Some of our members have already responded individually and with more detailed evidence to the consultation and the wider End Fuel Poverty Coalition membership wish to add their support to the views put forward by groups such as the Centre for Sustainable Energy and Money Advice Trust. We would be grateful if you could continue to keep the Coalition informed about developments in this consultation.

About the End Fuel Poverty Coalition

The End Fuel Poverty Coalition is a [broad coalition of more than 100 anti-poverty, health, housing and environmental campaigners, charities, local authorities, trade unions and consumer organisations](#). It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

We believe that everybody has the right to a warm, dry home that they can afford to heat and power.

Members of the Coalition include: [Act on Energy](#), [Action with Communities in Rural England](#) (ACRE), [Age UK](#), [Anti-Austerity Action Group](#), [Association of Local Energy Officers](#), [Association for Decentralised Energy](#), [Asthma + Lung UK](#), [Basingstoke & Deane Borough Council](#), [Beat the Cold](#), Bruton Town Council, [Camden Federation of Private Tenants](#), [Carers Trust](#), [Child Poverty Action Group](#), Church Poverty Action, [Chartered Institute of Environmental Health](#), [Chartered Institute of Housing](#), [Community Action Northumberland](#), [Centre for Sustainable Energy](#), [Climate Action Network West Midlands](#), Cyngor Gwynedd, [Debt Justice](#), [Disability Poverty Campaign Group](#), [Disability Rights UK](#), [E3G](#), East Durham

Trust, EBICO, Energise East Sussex, [Energise Sussex Coast](#), Energy Advice Helpline, Energy Cities, [Epilepsy Action](#), [Exeter Community Energy](#) (ECOE), Fair Energy Campaign, [Fair By Design](#), Fairer Housing, [Fuel Poverty Action](#), Fuel Poverty Research Network, [Generation Rent](#), [Green Alliance](#), [Groundwork](#), Hackney Foodbank, [Heat Trust](#), the [HEET project](#), [Independent Age](#), [Independent Food Aid Network](#), [Inner City Life](#), [Joseph Rowntree Foundation](#), [Lambeth Pensioners Action Group](#), Living Rent, Local Storytelling Exchange, [London Borough of Camden](#), [London Borough of Lewisham](#), [Marches Energy Agency](#), [Marie Curie](#), [Mencap](#), [Mayor of London](#), [MECC Trust](#), MND Association, Moorland Climate Action, [National Pensioners Convention](#), [Students Organising for Sustainability](#), National Children's Bureau, [National Energy Action](#), [New Economics Foundation](#), National Federation of Women's Institutes, [Northern Health Services Alliance](#), [Oxford City Council](#), [Positive Money](#), [Tower Hamlets](#), [Plymouth Energy Community](#), Redcar & Cleveland Council, [Repowering London](#), Retrofit Bruton, [Rossendale Valley Energy](#), [Ryecroft Community Hub](#), [Save the Children](#), [Sense](#), [Severn Wye](#), [Scope](#), [Social Workers Union](#), [South Dartmoor Community Energy](#), [South East London Community Energy \(SELCE\)](#), [Southwark Group of Tenants Organisations](#), [South West London Law Centres](#), [Tamar Community Energy](#), [Thinking Works](#), Uplift, [UNISON](#), [Warm & Well in Merton](#), [Winter Warmth Network](#), [Young Lives vs Cancer](#), Village Larder (Cumbria), [361 Energy](#).

The Coalition is also part of the [End Child Poverty Coalition](#), the Essential Services Advisory Network and the [Renters Reform Coalition](#). We work closely with [Energy Action Scotland](#), [NEA Wales](#) and the [Fuel Poverty NI coalition](#). The coordination for the [End Fuel Poverty Coalition](#) is provided by social enterprise [Campaign Collective](#).

Academics involved in the Coalition include those from the Universities of Bangor, Birmingham, Edinburgh, Exeter, Leeds, Leicester, Oxford, Strathclyde, Sussex, Worcester and York.

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