

## Response ID ANON-SZN1-34EY-H

Submitted to Default tariffs: A call for evidence  
Submitted on 2024-04-22 20:00:18

### Call for Evidence on Default Tariffs

#### About you

What is your name?

Name:  
Simon Francis

What is your email address?

Email:  
info@endfuelpoverty.org.uk

What is your organisation?

Organisation:  
End Fuel Poverty Coalition

We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

Yes

How did you hear about this consultation?

How did you hear about this consultation?:  
Email from this department

Other (please specify):

### Principles for Design of future Default Tariffs

1 Do you agree with these principles

This is the response box for answering the question Do you agree or disagree with these principles:

Only if combined with an overriding principle to protect vulnerable households and those in fuel poverty from high energy prices, or discriminatory tariff regimes.

2 Are there any other key decisions concerning the future regulation of default tariffs that you believe these principles would not cover?

Response for the question "Are there any other key decisions concerning the future regulation of default tariffs that you believe these principles would not cover?":

Protection of groups unable to access time of use tariffs and for those who are unable to have a smart meter installed due to operational and technical limitations.

A "catch all" energy price cap which also protects consumers from spikes in wholesale prices caused by wider geo-political / economic events. The current price cap with a delay on passing through spikes to consumers continues to look like the best mechanism to do this.

Protection for groups who rely on energy for medical, health or family reasons through a discounted form of energy tariff (i.e. a social tariff or energy for all).

Universal support for those in energy debt to get back on an even keel.

A ban on discriminatory pricing by region or household type.

### The types of future default tariff

3 With current licence conditions, do you believe most domestic consumers will continue to default onto single-rate standard variable tariffs in future or are suppliers likely to consider using Time of Use tariffs as a default?

response box for question on current licence conditions :

There is a risk that only an energy elite will be able to access the ToU tariffs (i.e. those that work from home, have EVs and their own solar/battery combination) and that most other customers will continue to use either standard variable or fixed rate tariffs.

4 Should protections be placed on the type of default tariffs that suppliers use for domestic customers? If so, what should those protections be; for example, is there a case for limiting default Time of Use tariffs to static rather than dynamic pricing?

response to the question Should protections be placed on the type of default tariffs that suppliers use for domestic customers:

There absolutely should be protections in place for default tariffs - and for those that fix tariffs to prevent them being ripped off by extortionate exit fees (which have increased 345% in recent years on average).

5 Should there be different default arrangements for consumers identified as being vulnerable?

response box for the question Should there be different default arrangements for customers identified as being vulnerable:

Yes - further protections should be in place to ensure they are able to use a discounted energy tariff.

6 What rights should domestic consumers have over the type of tariff they default onto? Should all suppliers be able to provide both single- and Time of Use default tariffs for households to move onto?

response box to the question on What rights should domestic consumers have over the type of tariff they default onto:

Suppliers should be compelled to provide customers with accurate information on the best available deal for them (based on their tariffs) and that there is a ban on discriminatory pricing (i.e. energy firms offering cheaper tariffs to certain customer types) and a continuation of the ban on acquisition tariffs (i.e. customers should be able to access the best tariff even if they are an existing customer).

7 Are there specific default tariff arrangements that you believe industry or public bodies should trial?

response box to the question on Are there specific default tariff arrangements that you believe industry or public bodies should trial:

Trials should proceed with caution, be inclusive and should be accessible to all - not just an energy elite.

### Default tariffs for low-carbon technologies

8 Do you agree that default tariffs for households with electric vehicles should be smart Time and/or Type of Use Tariffs

response box to the question Do you agree that default tariffs for households with electric vehicles should be smart Time and/or Type of Use Tariffs:

9 Should there be protections to the type of tariffs that households with electric vehicles default onto? If so, what should those protections be; for example, should they use static rather than dynamic pricing?

response box to the question on Should there be protections to the type of tariffs that households with electric vehicles default onto? If so, what should those protections be; for example, should they use static rather than dynamic pricing?:

10 What should default tariff(s) be for EV owners who do not possess a smart meter or smart chargepoint? Do you believe many EV owners are likely to be in that situation in future?

response box to the question What should default tariff(s) be for EV owners who do not possess a smart meter or smart chargepoint:

11 Are there any other technologies, for example storage heating, which you believe should influence the default tariff arrangements of the households

response box for the question re there any other technologies, for example storage heating, which you believe should influence the default tariff arrangements of the households:

12 We do not believe that evolutions in default tariff types is likely to have significant impacts on households' ability to use or export power they generate at home with equipment like rooftop solar panels. Do you agree? If not, why?

response box for the question 12. We do not believe that evolutions in default tariff types is likely to have significant impacts on households' ability to use or export power they generate at home with equipment like rooftop solar panels. Do you agree? If not, why? :

### Default tariffs when fixed-term tariffs for low-carbon technologies end

13 If an electric vehicle owner has chosen a specific tariff, do you believe they could face a detriment if they default onto a different tariff structure at the end of the fixed term?

response box for the question If an electric vehicle owner has chosen a specific tariff, do you believe they could face a detriment if they default onto a different tariff structure at the end of the fixed term?:

14 How should (a) suppliers and (b) load controllers protect domestic EV owners who have previously chosen a specific tariff and charging structure, when the fixed term ends? Should there be a rule or principle encouraging default arrangements to maintain some consistency of tariff type when a fixed term ends? Is there a case for EV tariffs to be evergreen or rolling fixed terms?

response box for the question How should (a) suppliers and (b) load controllers protect domestic EV owners who have previously chosen a specific tariff and charging structure, when the fixed term ends? :

#### The price level of future default tariffs

15 Should the current default tariff cap be either reformed or replaced to provide more flexible price regulations as we transition to MHHS? If so, when in the transition to MHHS do you believe that change should take place?

response box to the question Should the current default tariff cap be either reformed to provide more flexible price regulations as we transition to MHHS?:

We estimate significant numbers of households will be unable to take advantage of MHHS. Therefore a back up default tariff cap - created on a fair and equitable basis with those who are able to access an MHHS cap - is in place to prevent deepening inequality in the energy system.

16 Do default price regulations need to support a greater diversity of tariff types to help secure lower long-term bills and meet households' different energy needs? If so, how might this best be achieved?

response box for the question Do default price regulations need to support a greater diversity of tariff types to help secure lower long-term bills and meet households' different energy needs?:

There is a risk that too many different tariff types will only serve to confuse consumers and allow energy firms to game the market. This must be avoided.

#### The future regulation of default gas tariffs

17 If price protections for default electricity tariffs are reformed in future, do you believe that regulations for default gas tariffs should also be updated?

response box for the question If price protections for default electricity tariffs are reformed in future, do you believe that regulations for default gas tariffs should also be updated:

Yes.