Consultation Response

Warm Home Discount: Better Targeted Support from 2022.

Department for Business, Energy, and Industrial Strategy (BEIS)

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About this consultation

This consultation proposes to extend the Warm Home Discount (WHD) scheme to 2026 and to expand the spending envelope from around £350 million to £475 million annually. The current Core Group of rebate recipients (now Core Group 1) will be retained but the consultation proposes significant reforms to the present Broader Group (now Core Group 2). These include improved data matching to facilitate automatic delivery of rebates. These automatic rebates will be provided for those who are in receipt of certain means tested benefits and who are also estimated to have high energy costs. Pension Credit Savings Credit will also be included in Core Group 2. A new disability Industry Initiative has also been proposed as well as reforms to the existing Industry Initiatives, and reductions in the customer threshold numbers.

Key points and recommendations

- Age UK believes there is a strong case for extending and reforming the WHD scheme, but recommends changes to the Department for Business, Energy, and Industrial Strategy's (BEIS) proposals.
- Awareness and take-up of Pension Credit Guarantee Credit (PCGC) by eligible older people must be improved. Flexibility must be built into the WHD funding envelope to account for any increases in the number of Core Group 1 claimants.
- Core Group 2 energy cost estimates need to account for both the higher heating costs of older people and for differences in household heating systems.
- Challenging the high energy cost estimate made by BEIS must be an easily accessible process with online and offline communication channels available. We also call for transparency regarding the imputation algorithm used, and that the functionality of the algorithm is publicly reviewed each year to assess its suitability.
- Many properties will be incorrectly defined as having low energy costs, but many householders will not be aware of this, or challenge the assessment. Improved helpline access and better promotion of recourse available for challenging the assessment will be essential in addressing these issues.
- Individual rebate payments should remain at £140 but the proposed additional £10 should be redistributed to the Industry Initiative spend. We would call for BEIS to review this annually as the WHD progresses to assess whether the rebate payments are sufficient.
- Those with disabilities or long-term health conditions who are not claiming disability benefits should be included in the eligibility criteria for the disability Industry Initiative. The total fund value should also be reviewed annually to monitor up-take, with a view to increasing funding if necessary.
- It is essential that price comparison websites, supplier marketing and quotes/pricing clearly outline whether a supplier is a WHD provider and what WHD commitments they deliver. BEIS should make this mandatory with suppliers and price comparison websites.

About Age UK

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances. In the UK, the Charity helps more than seven million older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people. Its work focuses on ensuring that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe, and secure at home; and feel valued and able to participate.

Introduction
We welcome the opportunity to respond to this consultation. Age UK has first-hand experience of the benefits the WHD has for fuel poor and low-income older people. Existing Core Group and Broader Group energy bill rebates have supported millions of older people since the scheme's introduction, whilst our own experience of delivering the WHD's Industry Initiatives has demonstrated the critical role the scheme plays in keeping older people warm and well at home.

Age UK welcomes the extension of the WHD scheme and the proposed increase in spending outlined in this consultation. The improved funding and extension of the scheme through to 2025/26 will serve to support many more energy insecure and low-income households. It is also very positive to see reform of the Broader Group with the introduction of Core Group 2 (CG2) – particularly as this will now include those claiming the Savings Credit component of Pensions Credit.

Whilst many of the proposals in this consultation will benefit older people, the primary focus of the review is to better target and support low-income working age households with children. These families certainly need additional help with their bills; however, it is critical that the issues faced by older consumers are appropriately considered in the proposed reforms. Older people are at high risk from the health and wellbeing impact of fuel poverty and account for a higher proportion of excess winter deaths[1] than younger age groups. The major issue that this consultation must address is how to support older people who should be eligible for Core Group 1 (CG1), but who are not claiming Pension Credit Guarantee Credit (PCGC). This must form a critical part of the proposed changes to the WHD and its aim to improve its fuel poverty targeting through to 2026.

Around 30%[2] (560,000) of older people who are eligible for PCGC do not receive the WHD. Improving PCGC take up is a significant opportunity to improve the fuel poverty targeting rate of the WHD. At present, there is a lower proportion (28%) of Core Group recipients in fuel poverty than amongst Broader Group recipients (47%)[3]. This partly reflects lower fuel poverty rates amongst older people but may also be indicative of issues around targeting and ensuring some of the most vulnerable older people are receiving appropriate support with claiming. BEIS should commit to further investigating this disparity.

Industry Initiative funding for benefits advice plays a crucial role in helping older people overcome barriers to claiming benefits. Benefits advice can often be worth more to the individual than the value of the rebate itself and advice will help identify those who are eligible but not receiving the WHD. Beyond this broader issue, smaller gaps in Pension Credit provision may also exclude certain people from the WHD (e.g., mixed age couples, where one partner is above state pension age and the other below, which affects their ability to claim PCGC). Addressing gaps in Pension Credit access is critical in improving the fuel poverty targeting of CG1 and should not be overlooked in this consultation.

Beyond this, the proposals for CG2 require a greater level of recognition of the issues faced by older consumers. Energy cost calculations must automatically account for the higher expected bills paid by older people. Whether this is due to not being on the cheapest tariff, living in larger colder homes, or because of health conditions or disabilities which require more heating.

Individual scheme rebate payments should also remain at £140, but the proposed additional £10 per person should be redistributed to the Industry Initiative spend. We believe that better funding of the Industry Initiatives will allow for more flexible support of fuel poor households who do not qualify for CG1 or CG2. BEIS should commit to annually reviewing the impact of rising bills and inflation and, if necessary, increase the rebate payments and overall spend.

Overall, we see the proposed reforms of the WHD as a positive step towards improved eligibility and targeting. We welcome the continuation of the scheme and its inclusion of CG1, CG2 and the Industry Initiatives. The proposed reforms represent a significant step forward in realising the commitments of the Energy White Paper and addressing energy insecurity and fuel poverty. Our responses to the consultation questions reflect our primary concern that whilst the proposed reforms are positive, they could create additional problems with access which need to be addressed.

Question 1: Do you agree with the proposal to keep the eligibility for the current Core Group (Pension Credit Guarantee Credit recipients) unchanged, becoming Core Group 1?

We welcome the continued inclusion of PCGC recipients within CG1. However, there continues to be a major gap in the scheme for numerous older people who are on low incomes but are not in receipt of PCGC and therefore do not qualify for CG1. A significant proportion of older people who are eligible for PCGC do not receive the benefit. DWP data from 2019[4] shows that an estimated 30% of those eligible (560,000 people) do not receive PCGC. This group of 560,000 are likely to have a higher fuel poverty rate than those with access to PCGC, as incomes will be lower for those without access to the benefit. Further improvements to the fuel poverty targeting rate of the WHD can therefore only be achieved with improvements to the accessibility of PCGC. BEIS needs to commit to better supporting PCGC take-up amongst eligible older people. Digital exclusion, poor literacy, health conditions, disabilities and not having English as a first language can all reduce access to benefits. This means that those who lack access to PCGC and other benefits often have existing vulnerabilities. This will require concerted efforts by BEIS and DWP to improve up-take and eliminate barriers to access. This should be an additional commitment of the WHD scheme on top of the existing benefits advice Industry Initiatives provide.

Question 2: Do you agree with the proposal to replace the Broader Group with a new Core Group 2 who receive the rebates automatically, rather than having to apply?

In principle we agree with this approach and welcome its addition. However, there needs to be an accessible mechanism whereby claimants can challenge decisions to not award the rebate. Individuals should have recourse to easily and accessibly challenge decisions which they believe are due to incorrect automatic estimated heating costs. If an essential component of CG2 eligibility is based on estimated energy costs, then these assessments should also reflect the often higher energy costs of older people who frequently heat their homes for longer periods. Many older people face high energy costs without necessarily being classed as fuel poor. Retired households have the highest median fuel costs and the highest fuel poverty gap compared to households of other employment statuses[5], while many older people spend longer at home and are more likely to live with health conditions which require more heating or energy use, such as for dialysis or oxygen[6]. Also, older homes are more likely to be larger and less efficient. It is essential that CG2 energy assessments therefore reflect the often-higher energy costs of older people. This is particularly important for older people who have not yet retired or reached pensionable age so do not get access through CG1. It is also critical that the heating cost estimates account for the household's heating system rather than just the size, type, and age of a property.

Question 3: Do you agree with the proposed methodology to determine the Core Group 2 and the proposed eligibility criteria, which we estimate would increase the number of fuel poor households receiving the rebate from 47% under the Broader Group to 59% under the Core Group 2?

We agree with the principle of automatic enrolment based on certain means tested benefit and Tax Credit criteria. We also welcome the addition of Savings Credit to CG2. Nonetheless, in cases where ineligibility has been determined due to estimated heating costs, we wish to ensure that individuals can challenge their determined ineligibility in an accessible and efficient manner. If a critical part of eligibility under CG2 is estimated energy costs then, as stated above, these should reflect the often higher energy costs paid by older people compared to other age groups.

Question 4: Do you agree with our approach that Government should work with energy suppliers and third-party organisations to ensure there is dedicated support for households with a disability at risk of fuel poverty as part of an Industry Initiative? Please give views on the design and administration of such an Initiative, including the amount of overall funding, the amount of funding available to households, and eligibility.

We are pleased to see the inclusion of dedicated support for households with a disability at risk of fuel poverty and the proposal for a related Industry Initiative. It is particularly welcome that this Initiative will cover those who are not eligible under CG1 and CG2 due to their energy costs being deemed too low. It is also positive that this Initiative can be combined with existing CG1 and CG2 payments where applicable.

We agree that aligning the individual spending cap with the CG1 and CG2 rebate amount is a sensible approach, although we would welcome a degree of flexibility in specific cases given the often higher energy costs of certain people with long term health conditions or disabilities. We would also want to see those who are not claiming Personal Independence Payment (PIP), Disability Living Allowance (DLA), or Attendance Allowance (AA), but who still have disabilities or long-term health conditions, included in the eligibility criteria for the Industry Initiative.

In terms of funding, we believe there should be a review of the overall spending amount proposed for the Initiative. The latest data shows that there are around 1,378,000 people entitled to DLA, 1,529,000 entitled to AA and 2,708,000 entitled to PIP[7]. Whilst many of these people will either not be at risk of fuel poverty or are covered by CG1 and CG2, a large proportion will be fuel poor and not eligible for CG1 and CG2 support. Households consisting of someone with a disability or long-term health condition comprise almost half (45.6%) of all fuel poor households in England[8]. Fuel poverty rates for those with disabilities or long-term health conditions are also much higher (17.1%) than for those without (11.4%), with 1,447,000 fuel poor households comprising of someone with a disability or long-term health condition[9]. This leaves a significant degree of uncertainty as to the number of people who will be eligible for the Initiative or require support.

As a result, we would caution that the total maximum fund value of £5,000,000 is likely to be insufficient and should be awarded a degree of flexibility. This is particularly important given that this is a new Initiative. We request that an annual review is conducted after each scheme year to monitor up-take and allow for increases to the funding allocated for the Industry Initiative. This will ensure it better reflects the real-terms usage of the allocated spend and avoids imposing a restrictive initial spending cap which cannot be adapted in later scheme years.

Question 5: Do you agree with the proposed data-matching process, including the data-matching process with energy suppliers, to identify households eligible for the rebate under the Core Group 2 and provide rebates automatically on bills?

This method continues to rely upon people receiving means tested benefits to assess eligibility. Whilst this is a useful proxy there continues to be large problems with take-up of benefits even when people are eligible, particularly amongst older people. Whilst an alternative to using the benefits system as a proxy for low income presents its own problems, BEIS should commit to investigating alternative ways of identifying low income to improve the targeting of vulnerable groups.

Given the sensitivity of the data being shared between DWP, BEIS and suppliers, a principle should be applied that the minimal amount of data as possible should be shared with the supplier, and this be communicated to claimants. This may help avoid any hesitancy with engagement from recipients of Pension Credit or other means tested benefits. This data sharing process should be made transparent, so consumers are fully aware of what agencies have access to what information.

The use of Google Street view as a backup alternative to the Valuation Office Agency (VOA), Energy Performance Certificate (EPC), and the Land Registry provides a limited ability to assess property type, but this will undoubtedly be an expensive and time-consuming process with an inconsistent level of accuracy. This reinforces the need for a clear, transparent, and speedy procedure for challenging decisions - with both online and offline options available.

Question 6: Do you agree with Government's proposed use of an imputation methodology to fill in missing data or non-matched data to enable rebates to be delivered automatically to a greater number of people?

Based on the evidence provided, the imputation method for assessing properties with missing property information will address the majority of cases to a reasonable degree of accuracy. Nonetheless, there are potential issues in the approach. BEIS's own calculations suggest that there will be inaccurate data on neighbouring properties in 20-30% of cases, and by age in 10-20% of cases. Accurate floor area data will be difficult to achieve even in cases where an EPC is available. Our concern is that many properties will be inaccurately defined as having low energy costs, with householders being unaware of this or how to challenge the assessment. Improved access to the helpline and better promotion of the WHD scheme will be essential in addressing these issues. We also call for transparency regarding the imputation algorithm used. Given the scope for inaccuracy the functionality of the algorithm should be publicly reviewed each year to assess its suitability.

Question 7: Do you agree with the proposed approach to setting a qualifying date?

We strongly agree with the principle of ensuring the shortest gap possible between the two data matching points. Nonetheless, BEIS should commit to further reducing this window as leaving any gap between the two data matching points will result in an increased risk of people's circumstances changing. If people's status changes between these two points, it is also important that they can use the helplines to make an appeal and, where appropriate, support should be provided through Industry Initiatives. This is particularly important given that seasonal changes in employment often occur after the summer months - which would be around the July-October window for data matching.

Question 8: Do you agree with the proposed sweep-up and high-energy-cost verification and challenge process?

The calculations for high energy costs should also consider the higher energy costs of older people and those with disabilities or long-term health conditions as standard. The high energy cost calculations should also be based on any available information on the household heating system itself, as some heating systems are more expensive to run than others.

Nonetheless, expanding the helpline to include unmatched people in CG2 is a welcome addition to the WHD proposals. Whilst the methodology for high-cost low-income customers will help streamline the process of receiving WHD, for CG2 there are issues with the formula. It is unlikely that BEIS will be able to comprehensively and accurately identify ineligibility based on energy costs.

It is therefore important that the process of challenging this result is transparent and accessible with decisions deliberated as quickly as possible. The proposed self-assessment process and ability to challenge decisions made by BEIS will be initially completed online. This presents a significant challenge for digitally excluded older people who are vulnerable to fuel poverty. Around two in five (42%) of those aged 75+ do not use the internet[10]. It is therefore essential that BEIS establish an offline alternative for challenging assessment decisions as well as consideration of how community and voluntary organisations could also support clients to do so. Promoting the scheme using predominantly online channels will also result in lower take-up amongst the digitally excluded. BEIS will need to commit to promoting the scheme through a broader range of sources, particularly print media, mail drops, and through community and voluntary organisations.

Question 9: Do you agree with the proposed permitted alternative data sources for proving eligibility for the rebate?

Offering a range of data sources as methods of challenging the eligibility assessment is welcome. We do however stress the need for these methods of providing alternative data to be as accessible as possible. This must include provision for online and offline methods of making a challenge and providing evidence. We are also concerned about the implications of the proposal to request people to purchase an EPC themselves in cases where other forms of evidence have been exhausted. As EPCs cost around £60 each this would represent more than a third of the WHD rebate value. This final backstop is therefore unlikely to be used by the poorest households.

Whilst we recognise that having the option to challenge eligibility through an EPC is positive overall, particularly for those in the rental sector, we wish to highlight that this process may result in a number of vulnerable owner-occupier households choosing not to challenge their assessed eligibility. Using Industry Initiatives as a backup option to support those who were unable to prove eligibility could provide a useful method of supporting people who fall through the gaps. This will require a better funded and supported set of Industry Initiatives to ensure access.

Question 10: Do you agree with the proposed overall spending targets for Great Britain?

It is welcome to see the additional spending allocated to the WHD and the incremental inflationary increases as the scheme progresses through to 2026. The variable level of spending allocated to the Industry Initiatives is also welcome, as this will cover potential gaps in the data matching process and eligibility assessments for CG1 and CG2. We do however wish to ensure that the spending allocated to CG1 will account for any increased uptake of Pension Credit amongst older people. We hope to see an improvement in PCGC take-up rates from now through to 2026 which may mean an increased burden for the CG1 spend. We note the use of DWP estimates of PCGC claimant counts as the spending benchmark, but this may underestimate the size of the required spend if a larger proportion of older people claim the benefit. Greater spending flexibility and support for any necessary spending increases in subsequent scheme years will be required to account for any increases in PCGC uptake between 2022 and 2026.

Question 11: Do you agree with the proposed approach to apportionment of the total spending targets to Scotland from April 2022, currently equivalent to around 9.4%?

We agree with this approach.

Question 12: Do you agree with the proposal to make Industry Initiatives spending mandatory rather than optional?

Yes, this is necessary in order to maximise the effectiveness of the WHD.

Question 13: Do you agree with the proposed approach to use Industry Initiatives targets to balance the spending uncertainties created by the two Core Groups, through an adjustment before the start of the scheme year and a further, more limited adjustment in year, which are capped at £10 million from the Industry Initiatives' base spending obligation each scheme year?

It is welcome to see a level of flexibility to the spending on Industry Initiatives but given the issues raised in our consultation response it would be good to see a greater level of flexibility in the capped limit. We would suggest increasing this £10 million cap year on year in-line with the CPI inflation rate and monitoring access annually to the Industry Initiatives to assess whether subsequent years will require additional head room in the cap.

Question 14: Do you agree that the value of the rebate should be set at £150 for the duration of the scheme and that payment of the rebate should be as per current rules?

We request that the individual rebate payments remain at £140 but that the proposed additional £10 per person be redistributed to the Industry Initiative spend. We believe that better funding of the Industry Initiatives will allow for more flexible support of fuel poor households who do not qualify for CG1 or CG2. BEIS should commit to annually reviewing the impact of rising bills and inflation and, if necessary, increase the rebate payments and overall spend.

Question 15: Do you agree with the proposal to keep the scheme year as now, running from April to March?

We agree with this approach, particularly with the aim to make most payments over the winter months.

Question 16: Do you agree that spending on the provision of financial assistance with energy bills to households particularly at risk of fuel poverty should have a minimum spend of £5 million overall, with an overall cap of £10 million? If you think an alternative minimum and/or maximum spend should be set, please provide your reasons.

We welcome the increase in the cap to £10 million. We would suggest increasing the £5 million minimum and £10 million cap year on year in-line with the CPI inflation rate and monitoring access annually to assess whether subsequent years will require additional spending.

Question 17: Do you agree that such financial assistance should continue to be capped per household per scheme year? If so, should this be capped at £150, or at a higher level?

Flexibility is critical here, particularly as some households experience a deeper level of fuel poverty than others. Beyond the initial financial assistance payment, suppliers should be given the flexibility to award additional financial support based on circumstances (e.g., where a PPM customer has had a history of self-disconnecting). Furthermore, in the unlikely event that the £5 million minimum spending level is not reached, any additional money could be considered for redistribution to the most vulnerable households who have already received the financial assistance payment.

Question 18: Do you agree that a £3 million portion of the energy debt write-off cap should be reserved for customers with pre-payment meters (PPMs) who are self-disconnecting or are at risk of self-disconnecting?

Our main concern is the awareness PPM consumers have of their debt write off options. People over the age of 60 are far less likely to use a PPM than younger age groups[11]. Older consumers may self-disconnect to attempt to avoid incurring debt. We would ask BEIS to work with Ofgem, suppliers, and energy advisers to focus on promoting the ways PPM customers can write off debt, and what might be best for them.

Question 19: Do you think that the cap on debt write-off should be reduced from £6 million to £5 million overall, and from which scheme year should this take place?

Given the unknown impact of the Covid-19 pandemic upon debt levels, we strongly disagree with a reduction of the cap to £5 million. The present level of £6 million should be maintained to cover uncertain debt levels and further support should be provided from Government and suppliers in the form of payment matching and debt write-off (funded separately from the scheme). This will help to address rising levels of arrears and the resulting risks of customers self-disconnecting and self-rationing their supply over the coming years.

Question 20: Do you agree that the individual debt-write off cap should continue to be capped at £2,000? If you think an alternative cap should be set, for instance more in line with average energy debt levels, please provide your reasons.

We agree that the present individual write-off cap of £2,000 should be kept rather than reduced. We do not believe that the solution to increasing the number of customers who receive a debt-write off is to reduce the individual cap. Providing better funding of the scheme (such as maintaining the overall cap at £6 million) will better improve access whilst supporting those with the highest debt levels. We would also welcome a degree of flexibility to the upper limit of the cap. Suppliers have new licence conditions set by Ofgem which mean they should already be working with customers in significant debt. In certain circumstances it would be advisable to allow a 10% leeway in the maximum cap amount. This will help reduce debt levels for those who are just above the cap threshold. This would be particularly welcome where there is underspend on the scheme which could be reallocated to support those who are just above the cap threshold.

Question 21: Do you agree that the installation of mains gas boilers to replace existing boilers that have ceased to function properly should only be permitted in households with a specific vulnerability to cold, as outlined?

We agree with this approach as it will ensure that vulnerable consumers are protected from the potentially larger costs of having to install a boiler alternative such as a heat pump. We particularly welcome the inclusion of people aged 65+. However, we would ask that BEIS specifies what it means by ‘at risk’ of fuel poverty. Many people aged 65+ will fall just outside of the fuel poverty definition, but with even minor fluctuations in energy prices, or reductions in income, they could be classified as fuel poor. A more specific definition of what BEIS means by ‘at risk’ would therefore be preferable so as to quantify who will be supported.

Question 22: Do you agree that boiler replacements should be limited to £8 million per scheme year from 2022/23?

Boiler replacements through WHD Industry Initiatives serve as a critical lifeline in emergency situations for many older people. Setting a cap at £8 million with the intention that people will access alternative longer-term programmes and Initiatives (e.g., ECO) may result in some people being left without a viable boiler replacement when they need it. We suggest at minimum that the cap be set at £10 million and that it rises with the CPI inflation rate year on year through to 2026. Ideally, we would also like to see an additional commitment to monitor the level of take-up and to increase the cap after the first year of the Initiative if it is significantly deficient in covering needs.

Question 23: Do you agree that the obligation threshold for the whole scheme should be reduced from April 2022 to 50,000 domestic customer accounts? If not, what would you suggest is a more appropriate threshold and why?

We agree, this is a gradual transition point which will mean medium sized suppliers will have to conform with the scheme whilst ensuring smaller suppliers get more time to transition to the 1,000-customer threshold proposed for April 2023. However, we would call for greater clarity on price comparison websites, supplier marketing and quotes/pricing as to whether a supplier is a WHD provider (and what the WHD is). This could come in the form of an addendum to any quote or price provided by a supplier which outlines the suppliers WHD credentials for the given scheme year. This will ensure that older customers can switch with confidence to suppliers who are large enough to provide support for CG1 and CG2 as well as at least the minimum Industry Initiative contribution.

Question 24: Do you agree that from April 2023 the supplier threshold should be reduced to 1,000 domestic customer accounts?

We agree with this approach. As stated, reducing the threshold to less than 1,000 customers will have negligible impact on the number of people who will be supported but may create an onerous administrative workload for the very smallest suppliers who are just entering the market. However, as stated in the response to Q23, we call for clarity at the point of sale and other customer facing comms, about whether a supplier is a WHD provider.

Question 25: Please provide evidence of costs of delivering Core Group rebates, your estimated costs of delivering to Core Group 2, and the costs of setting up Industry Initiatives (specifying if this is a multi-supplier scheme), in cost per pound of support delivered.

Question 26: Do you agree with the proposed continuation of the arrangements for the reconciliation mechanism, extending to cover both Core Group 1 and Core Group 2, and that this should similarly continue in Scotland, in the event that the current WHD scheme continues in Scotland?

We agree with the proposed approach.

Question 27: Do you agree that we should continue with the current Supplier of Last Resort (SoLR) arrangements and not introduce a mandatory requirement for an SoLR to take on the WHD obligations of a failing supplier? What alternative arrangements could be put in place that may encourage the SoLR to take on those obligations, including in relation to Industry Initiatives?

Whilst, as stated, most suppliers honour the WHD commitments of failed suppliers, BEIS's proposed changes to the WHD scheme will result in a larger number of medium and small suppliers having WHD obligations. This may result in a reduced level of adherence to the existing status quo. Incentives (e.g., Ofgem taking WHD commitments into account in appointing the SoLR) will continue to encourage SoLR's to take responsibility for a failed supplier's WHD commitments. However, we believe that the Government and regulator should step in as a last resort to cover any missed WHD commitments when a supplier fails and the SoLR does not honour the failed supplier's commitments. It is also critical that there is better data matching in the event of a supplier failing. This will ensure a simpler transfer of information regarding customers' WHD eligibilities, upcoming rebates, and Industry Initiative commitments from the failed supplier to the SoLR.

Question 28: Do you agree with the proposal that Ofgem should assess and approve applications from suppliers seeking to participate voluntarily in the scheme?

We support the proposal.

Question 29: Do you agree that from 2023 we introduce a second customer number reporting date?

We agree with this approach and welcome its addition.

Question 30: Do you agree that Ofgem should continue to act as the operator of the reconciliation mechanism for the scheme?

We agree with this approach.

Question 31: Do you agree that energy suppliers with multiple licences should be permitted to consolidate under one licence?

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