

# Tackling Energy Debt in the Supplier Home-Moves Process

## Response from Citizens Advice Scotland – January 2026

### Key Points and Introduction

- Energy debt is out of control across Scotland, and **the key driver is high costs**
- Measures to address the crisis of energy debt need to be focused on the urgent introduction of a new **social tariff and a more comprehensive, robust debt write off scheme**
- **Citizens Advice Scotland does not support the proposals for tackling debt in the home-move process.** Our evidence shows that these measures are likely to be ineffectual and unworkable, with a significant risk of harm, particularly for people in vulnerable situations
- The proposals for changes to the home-moves process would put people at risk of disconnection, with **harmful consequences for physical, mental and financial wellbeing**
- Trust between people and energy suppliers needs to be rebuilt through communication from suppliers that is accurate, accessible and empathetic, plus proactive measures to **alleviate the pressure on those worst affected**, rather than through punitive actions

### After years of unaffordable costs, energy debt is out of control, harming people across Scotland

The assertion that the problem of energy debt is past crisis point and that urgent action is required is not a contentious statement; it is frighteningly evident. The invaluable support our network provides gives us a unique insight into the reality faced by people living in fuel poverty and energy debt. In 2024/2025, CABs in 300 locations across Scotland supported over 25,000 people with energy-related issues; the average energy debt brought to CABs was £2,500, rising to £3,180 in rural areas. Every day, advisers at CABs and the Extra Help Unit (EHU) see the toll this takes on people's mental, physical and financial health, especially given that energy debt rarely exists in isolation, and people are living with multiple, overlapping pressures.

The key driver of the astronomical levels of energy debt in the sector is high energy prices. According to [Ofgem's own data](#), the value of energy debt in Q4 of 2020 was £1.45bn compared with over £4.4bn currently. Our evidence shows that the quantum of debt people bring to their local CAB has risen by 130% since 2019/2020, and the number of people seeking energy debt advice has jumped 65% in the same period. These huge increases have occurred following the steep rise in costs in 2022, and while prices may have stabilised, they remain alarmingly high, with around a third of people (30%) who needed energy support from CABs in the lightest, warmest months of 2025 (July-September) in need of a fuel voucher to stay connected. For too long, people have been faced with either accruing arrears or going without heat and light, getting into debt to access the essentials that we all need to live in safety and with dignity. Action to prevent the buildup of debt therefore needs to be **focused on making energy affordable through measures such as a social tariff for those on low incomes or with unavoidably high usage**. In addition to a robust, comprehensive and accessible scheme to write off existing energy debt, action on

affordability is absolutely vital to prevent the accumulation of further debt and break the harmful cycle in which thousands of people find themselves trapped.

We recognise that the proposals in relation to home-move processes are part of a wider debt strategy, but they will ultimately fail to address the root cause of the problem. Time and resources would be better spent on more meaningful action to tackle harm, rather than risk further detriment as these proposals are likely to do.

## **Proposed changes to supplier home-move processes have the potential to cause harm, particularly to people in vulnerable circumstances**

Prepayment meters (PPM) are not suitable for all households, hence the 'safe and practicable' tests that exist to ascertain suitability before carrying out an involuntary switch to PPM. The proposals here, that the remote switch would be actioned when an occupier has notified the supplier they are moving out of the property, could mean the incoming tenant would need to contact the supplier to establish an account before they can have access to hot water, heating or turn on the lights.

If an outgoing tenant does not inform the supplier of their move for several days or weeks, the incoming tenant may be on supply for the start of their tenancy only to find themselves suddenly without power or heat, potentially not knowing why. For people with health conditions, who are elderly, or have young children, this would be in contradiction to regulations on safety and practicability assessments when involuntarily switching and could have disastrous consequences. The reality of being off supply and being unable to credit a prepayment meter is stark.

**Anita's experience:** Anita came to her local CAB in December 2025 as her prepayment meter was faulty and she was struggling to stay on supply as a result. She has cancer and her home needs to be kept warmer than usual as she feels the cold more intensely due to her treatment. Although she is on the Priority Services Register, Anita's supplier had told her they wouldn't be able to fix the meter until January 2026. The meter fault, compounded by unavoidably high usage, meant that Anita was having to spend a significant amount of her social security payments on energy costs, leaving her little money for food and other essentials. At an already difficult time in her life, Anita's wellbeing was worsened by the continual battle to keep a constant supply of energy.

The parallels drawn by Ofgem with processes for accessing broadband services when moving into a new home are disingenuous; the comparison is not equivalent in terms of impact. While broadband is undoubtedly an essential utility, lack of access for a short time does not have the same immediate impact as lack of access to light and heat. 48 hours without internet access can mean delays in accessing support and a risk of social security sanctions, but 48 hours without electricity or gas poses an urgent risk of danger and, in some cases, a threat to life. Processes for home-moves that exist for other services must therefore not be applied in the context of energy, which is immediately essential.

## **Difficulties engaging with suppliers risk making home-move proposals unworkable**

Ofgem's suggested protective measure of loading the meter with enough credit to last a weekend or holiday period, with the idea that this would be enough of a grace period to allow a new tenant to contact the supplier and establish an account, is not compatible with real-world circumstances. There are multiple reasons why people don't set up energy accounts immediately after moving in, including language barriers, digital exclusion, disabilities, and unpredictable life circumstances. People in temporary accommodation, for example, face particular challenges, unsure of how long

they will be in their tenancies. Advisers across our network support people every day whose lives involve multiple, overlapping difficulties that mean correspondence from energy suppliers go ignored, not due to fecklessness but to psychological distress.

One CAB adviser spoke about supporting somebody who is a full-time carer for their partner, who has significant mental health issues, with Adult Disability Payment and Carer's Allowance as their sole income. They told their CAB adviser that while they're aware they have energy debt, coping with the psychological strain of their daily life means that supplier letters go unopened as they "just don't have the time or head space to deal with them." There are also situations in which there is confusion over liability for energy, which was the case for Neelam.

**Neelam's experience:** Neelam came to her local CAB for support with social security and council tax after being housed in temporary accommodation by the local authority. After having been in the flat for 2 months, Neelam's housing officer told her that she was responsible for paying her energy costs. She had not been aware of this, as she had thought it was included in her rent. As a result, she had accrued £450 of energy arrears and was now having to pay £108 to cover ongoing costs and repay the debt. A care leaver with a baby under a year old, Neelam was in a vulnerable situation and burdened with debt despite doing her best to be proactive in organising her life.

Under Ofgem's home-move proposals, Neelam could have found herself and her baby with their lights, heating and hot water disconnected; a stressful period in her life would have been made unimaginably difficult. Allowing this to happen would amount to the toleration of avoidable harm.

Ofgem states *'We want to ensure any process that is developed is designed to ensure consumers engage promptly with their energy supplier when moving into a property, while giving suppliers the tools to understand customer needs and manage debt effectively.'* As stated in our response to Ofgem's [Debt Relief Scheme consultation](#), re-engagement of people with their suppliers is a necessary part of tackling the crisis of energy debt, but this involves rebuilding trust at a time when it has been severely eroded. Measures like those laid out in Ofgem's home-move proposals, that are punitive rather than positive, serve to deepen that distrust rather than foster re-engagement.

The proposals are also designed within the context of suppliers being available and efficient in their engagement with people trying to set up their accounts after moving into a new property, yet our evidence suggests this is often not the case.

**Peter's experience:** Peter moved into his home in 2022 and had contacted the supplier several times by phone, email and online. Despite his efforts, he was unable to set up an account. The local authority referred him to his local CAB for support as he is still yet to receive a bill and is extremely worried about accruing debt he will struggle to pay. Peter has various health conditions, including mental health issues, which have been exacerbated by this situation. Peter lives in a rural, hard-to-heat home, with limited public transport, and he finds it difficult to use the internet without support.

Experiences like Peter's are all too common across our network and Scotland. For people like him, with issues of digital exclusion and living in a rural area, a remote switch to prepayment mode would mean being left off supply, unable to top up online or use an app without assistance, and struggling to travel to a PayPoint or PayZone to purchase manual top up cards.

## **Ofgem's home-move proposals put people at risk of being stuck pre-paying for their energy even after setting up an account**

We previously outlined concerns that new occupiers may not automatically be offered a switch back to a credit meter once they have established an account with their energy supplier. This remains an area of concern; we have seen examples where people have been subject to credit checks or asked to pay a security deposit in order to switch from prepayment to credit mode. Ofgem's home-move proposals run the risk of people, many of whom will be living in vulnerable circumstances, being subject to lengthy and invasive processes with their energy supplier. This can be detrimental not only to people's wellbeing but does little to rebuild their trust and confidence in suppliers.

Based on evidence from across our network, the proposed changes to home-move processes will serve only to entrench distrust of energy suppliers, inflict harm upon people in vulnerable situations, and take focus away from addressing the key driver of debt which is fuel poverty caused by high costs. Without action on affordability, debts will only continue to rise, causing harm to individual households as well as the wider economy. An affordable social tariff and a far-reaching debt relief scheme would dramatically improve the lives of hundreds of thousands of people across Scotland, reducing pressure on public services and the advice sector, along with delivering positive reforms to the broken energy market that we urgently need.

### ***About Citizens Advice Scotland***

*The Citizens Advice network in Scotland is Scotland's largest independent advice provider. Advisers across all corners of the country work in Citizens Advice Bureaux (CAB) to provide free, impartial and confidential advice. Our Extra Help Unit (EHU), based in Glasgow, helps people resolve complex and time-sensitive energy problems. Each year our network supports hundreds of thousands of people, unlocking millions of pounds worth of financial gains. By looking at a person's complete circumstances, CAS gains an unparalleled insight into the scale and complexity of what's happening in communities throughout Scotland.*

For further information, please contact Senior Policy Officer Molly Shevlin at [molly.shevlin@cas.org.uk](mailto:molly.shevlin@cas.org.uk)