



Advice in Detail: Energy

Issues brought to the Citizens Advice Service in Scotland 2015-16



Consumer Futures Unit



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Citizens Advice Scotland (Scottish Charity Number SC016637)

Executive Summary

1. The Consumer Futures Unit ('the CFU') sits within Citizens Advice Scotland ('CAS'). The CFU is the Scottish consumer representative body in the regulated markets of energy, post and water. It uses evidence, expert analysis and research to put consumer interests at the heart of policy-making and market behaviour.

2. Our Energy Advice in Detail report provides an annual analysis of the energy issues upon which the clients of the Citizens Advice Service in Scotland sought advice in 2015-16, and places these issues within the wider policy context.

3. The first edition of Advice in Detail in its current format covered the period 2014-15, and also drew on previous CAB data from 2013-14 for comparison. This current edition describes the experience of energy consumers in Scotland for the 2015-16 year, and follows a similar format in using evidence from the same three sources:

- Issues raised by clients through the 61 Citizens Advice Bureaux across Scotland, of which there were 23,237 new energy issues recorded, an increase of 5% from 2014-15.
- Calls from Scotland to the Citizens Advice Consumer Service, of which there were 4,210, a decrease of 12%.
- Support for vulnerable consumers in Scotland provided by the Extra Help Unit, of which there were 1,163 cases, almost identical to the number in 2014-15¹.

4. Taken together, the data provide a clear indication of the main areas in which energy markets are currently failing to meet the needs of consumers. Data from the Citizens Advice Service indicate that issues raised in Scotland are broadly consistent with the pattern of issues raised in England and Wales.

4.1 Billing and metering issues are still extremely prevalent

Nearly a quarter of all energy issues raised across all three parts of the Citizens Advice Service in Scotland relate to billing and metering issues. There are clear standards which gas and electricity suppliers are required to meet, but our experience, in common with other evidence, shows that problems remain and cause significant hardship for consumers, particularly those on low or fixed incomes. Although the number of billing and metering issues decreased slightly in 2015-16 it remains the largest single group of issues raised.

4.2 Management of energy debt still needs to improve

In many cases, the underlying causes of energy debt are changes to the social security system. Energy suppliers have a role in managing consumers' debt responsibly. Suppliers are subject to licence requirements to take ability to pay into account when setting debt repayment rates. Cases continue to show that this is not carried out consistently by suppliers.

¹ Cases refer to both enquiries and investigation into complaints for Scottish consumers.

In particular, our evidence highlights a number of issues with debt collection processes. Repayments are often set too high for consumers to afford and can be implemented without due consultation. If a debt is transferred to a collection agency, the additional costs added to a customer's account can be disproportionate and unaffordable.

4.3 Customer service standards and complaints procedures are not sufficient or delivered consistently

Our evidence suggests that clients are often frustrated by the level of customer service they receive from their energy supplier. Customers can be faced with long and multiple telephone calls to call centres. When they do get through to a customer service team, they can be given advice that is of varying quality and is often contradictory. In some cases their issues remain unresolved. After receiving poor customer service clients may want to register a complaint. However the complaints procedure is often not clear to consumers.

4.4 Switching tariff or supplier processes still create problems

The Competition and Markets Authority (CMA) investigation into the GB energy market clearly identified the financial detriment suffered by the majority of consumers who do not regularly switch from standard variable tariffs to better deals. However, the CMA's proposed remedies rely strongly on increasing switching rates to address this.

Across the three Citizens Advice Services in Scotland the issues relating to switching supplier increased 2015-16 compared to 2014-15. This may be related to an increase of switching rates which increased by 15% in 2015 compared to the previous year. Our evidence shows that errors continue to occur in the switching process – and, further, that over a third of problems occur even when switching tariff with an existing supplier².

4.5 Delivery of the Priority Services Register is not consistent

Our evidence suggests that people in vulnerable situations are not always receiving the support they require, with awareness of the Priority Services Register among suppliers' representatives varying considerably at the point of contact with consumers.

4.6 The Warm Home Discount leaves some consumers without support

Schemes such as the Warm Home Discount are not accessible to all eligible consumers and in many cases fuel poor clients are not even aware of the scheme. Our evidence shows that barriers such as online registration, annual applications or limited windows for registration continue to prevent eligible households from accessing this support. Further, not all smaller suppliers are required to offer the WHD to customers. This is often not clear to consumers when they switch supplier to access the best deals.

² Based on data from Scottish CAB- Regulated fuel issues

4.7 *Removal of zero standing charge tariffs leaves consumers paying bills despite low or no energy use*

Well intended changes to the energy market, including changes to the rules around standing charges have continued to adversely affect some households with very low energy use. Recent cases show the impact this issue currently has on vulnerable consumers.

4.8 *Electric Heating and Restricted Tariff consumers need targeted support*

Our case studies highlight that certain groups of consumers may receive an inadequate service for their energy account, owing to a range of factors such as the type of meter their household uses or the way they heat their property. In particular, people with restricted time-of-use (ToU) meters linked to electric heating systems are often unable to switch suppliers. This group has also been identified by the CMA, and a remedy of moving to single rate tariffs proposed. Our case studies illustrate the complexity of the circumstances faced by these consumers, which need to be borne in mind when developing remedies to these problems. This issue is linked to smart meters – while consumers using these restricted tariffs should benefit most from access to a wider choice of tariff, the complexity of their circumstances means that they are likely to be at the end of the queue for smart meters.

4.9 *The Smart Meter rollout needs to address emerging issues*

In principle, we support the move to smart meters, as it should help address inaccurate billing while also widening choice and improving convenience, particularly for those using prepayment meters. Early positive experience – and installers learning from experience – will be critical to ensure the roll out is successful. While the numbers of complaints about smart meters reported to us are relatively low, the smart meter rollout – currently set to be completed by 2020 – will mean a very large increase in smart meter installations in coming years³.

Our evidence shows the types of problems which are already occurring and which should be addressed. In 2015-16 clients raised issues around the provision for support once a smart meter has been installed by an engineer. Effort should be made to ensure vulnerable clients such as those on the Priority Service Register (PSR), are supported in the smart meter roll out⁴.

4.10 *Lower income off-gas consumers need more help*

Households who use heating oil or Liquefied Petroleum Gas (LPG) to heat their homes generally pay more for their fuel, and do not benefit from the consumer protections which apply to electricity and gas suppliers. While joint research between CAS and Citizens Advice in England and Wales shows that satisfaction rates with these fuels are generally high, it also shows that higher costs are a concern, especially for consumers on lower incomes⁵.

³ Consumer Futures Unit (2016) Smart Move: Taking stock of the smart meter rollout programme in Scotland

⁴ Citizens Advice (2017) Smart Support: Support for vulnerable consumers in the smart meter roll-out

⁵ Consumer Futures Unit and Citizens Advice (2017) Living without mains gas

4.11 *Small businesses*

Small businesses contacting our service are often disadvantaged by the rules surrounding business energy contracts, such as a lack of a cooling off period for them to confirm whether they have received suitable terms of service. Our evidence shows that these contractual issues can be severely detrimental for small businesses already running on tight margins. As with switching and electric heating tariffs, we welcome the CMA's remedies that should address these concerns.

What we do

5. The Consumer Futures Unit ('the CFU') sits within Citizens Advice Scotland ('CAS') the umbrella organisation for Scotland's network of 61 member Citizens Advice Bureaux (CAB). The CFU is the Scottish consumer representative body in the regulated markets of energy, post and water. It uses evidence, expert analysis and research to put consumer interests at the heart of policy-making and market behaviour.

6. **Citizens Advice Bureau** can be accessed in more than 250 locations across Scotland. They help more than 250,000 people each year with practical advice and support in negotiating on behalf of clients. The Scottish CAB Service is a holistic advice service, offering support with a wide variety of issues from social security and debt to housing, employment and a growing array of consumer issues. CAB support is offered in person, online and over the phone.

7. In terms of energy issues, the Scottish CAB service has provided long-standing support to energy consumers. The energy advice provided by CAB supports clients across a wide range of issues, from managing fuel bill debt and arrears to accessing additional support, including available grants or funds.

The Citizens Advice Service also operates two advice lines which are GB-wide:

8. The **Citizens Advice Consumer Service** is a public service which has been run jointly by CAS and Citizens Advice since 2012 to complement the face-to-face advice offered by the CAB network. Consumers can access this advice by phone, email, web form and post and can get self-help advice online. As with the CAB network, the aim of the service is to offer advice to citizens on a wide range of topics. This includes specialist advice on energy-related issues.

9. The **Extra Help Unit** is a specialist team of caseworkers investigating energy and post complaints on behalf of vulnerable consumers. The service is delivered by CAS and covers the whole of Great Britain helping domestic and micro-business consumers. A consumer may be vulnerable if they are unable to pursue a complaint on their own behalf due to personal circumstances, the complexity of their complaint or where they are at risk of having their energy supply disconnected. The EHU also actively seeks to identify and address policies and practices affecting vulnerable consumers and works closely with the policy units within the Citizens Advice Service, suppliers and industry regulators to make improvements. The Extra Help Unit is not a public helpline. Consumers can only be referred to the EHU by the Citizens Advice Consumer Service, CAB advisers, Energy Ombudsman, Ofgem and elected representatives.

10. Collectively, these three services are referred to as the 'Citizens Advice Service': the Scottish CAB, the Citizens Advice Consumer Service and the Extra Help Unit. In 2015-16 the Citizens Advice Service network helped over 310,000 clients in Scotland alone and dealt with over one million advice issues.

The organisational aims of the Citizens Advice Service in Scotland are:

- *to ensure that individuals do not suffer through ignorance of their rights and responsibilities or of the services available; or through an inability to express their needs*

and equally

- *to exercise a responsible influence on the development of social policies and services, both locally and nationally*

Policy work

11. In addition to the Citizens Advice Service's public advice role, the CFU undertakes work to influence the development of social policy in the regulated markets of energy, post and water in the UK, as well as at Scottish Government level.

The CFU gathers qualitative and quantitative evidence from our network and services about the problems people experience. We make recommendations based on this evidence, drawing upon policy expertise, new research and market intelligence to advocate for change in the interests of current and future consumers. We empower people by developing consumer education campaigns and advice that take forward the recommendations from our evidence based research. Our role is to ensure:

- ▶ the evolving energy, post and water markets have consumer needs at their heart
- ▶ all services are accessible to consumers regardless of income or location
- ▶ consumer principles are at the heart of policy and regulation
- ▶ utility products and services deliver the right outcomes for consumers

For more information on the CFU and our policy work please see our website⁶.

⁶ <http://www.cas.org.uk/about-us/social-policy/consumer-futures>

About this report

12. The annual publication of 'Advice in Detail: Energy' provides an annual analysis of the energy issues that consumers face in Scotland. This particular report analyses the evidence recorded in 2015-16¹ by Scottish Citizens Advice Bureaux (CAB), the Citizens Advice Consumer Service (the 'helpline') and the Extra Help Unit (EHU) specifically to clients residing in Scotland.

13. The quantitative statistics used here provide an overview of the type and number of energy issues on which people in Scotland sought advice in 2015-16. In addition, this report highlights qualitative evidence from case studies to illustrate how energy issues often sit within a wider, more complex set of issues that households face.

This report is structured in three parts to analyse evidence from:

- i) the CAB
- ii) the Citizens Advice Consumer Service
- iii) the Extra Help Unit

14. These 3 sources of data are analysed separately because each uses a different method of data capture; for example, the classification of issues by an 'advice code' varies in each case. It is therefore not possible to make direct issue by issue comparisons between data sources. In some cases there are significant changes to the number of energy issues handled in 2014-15 compared to 2015-16. Whilst it is not possible to identify the precise reasons for the changes, this report notes wider policies and practices which might, in part, explain the changes.

15. The Background and context section of this report outlines the overarching energy market and policy factors in 2015-16 which may have contributed to changes in the volume and type of advice queries. Other factors include the growing reach of bureaux-led energy advice projects.

¹ Refers to financial year - 1st April 2015 to 31st March 2016

Background and context

16. In 2015-16 there was a continued global trend of decreasing wholesale energy prices^{7,8}. While the large suppliers reduced the price of their standard variable tariffs (SVTs) by 5% from the start of 2015 to April 2016, only a 2% reduction was seen in consumer bills in 2015 compared to 2014⁹. This in part was due to increased consumption following a cold winter in 2015⁸. A similar trend was seen in Scotland where depending on the method of payment, domestic electricity bills decreased by 2% on average between 2014 and 2015¹⁰ and gas bills by 5% over the same time period. As is shown through this report, billing issues continue to be the most common energy issue for clients across the Citizens Advice Service in Scotland.

17. One consequence of falling wholesale prices has been the increase of new, small-scale entrants to the energy supplier market. These small-scale suppliers have been able to take advantage of lower wholesale prices to offer competitive prices. In addition, if they have fewer than 250,000 customers, they are not obliged to contribute to government-mandated schemes such as the Energy Company Obligation (ECO) and the Warm Home Discount (WHD)¹¹. By contrast larger suppliers have to recoup costs that they paid in the past when the unit cost of gas and electricity was proportionally higher. In 2013 independent suppliers¹² had 1% of market share which increased to 8% in 2014, across the GB market. By October 2015 independent suppliers had 12% of market share¹³.

18. Whilst this is good news in terms of increasing competition within the energy supplier market, there has been a rise in customer service complaints levelled at some new suppliers on the market. The Extra Help Unit reported that in the last five years the number of energy suppliers that they have received complaints about and engaged with has increased from 25 to 53 (includes some non-domestic suppliers). However figures compiled by Ofgem suggest that across the market, the total number of direct complaints from all suppliers has decreased since January 2015 to January 2016¹⁴.

19. The major 'Energy market investigation' by the Competitions and Markets Authority (CMA) was published on 10 March 2016. It set out a series of provisional proposals to reform the energy market, open up competition and help customers get a better deal. The CFU together with Citizens Advice in England and Wales formulated a response to the CMA's proposed remedies. One of the key recommendations from the CMA report that CAS broadly support is the capping of prepayment meter (PPM) tariffs in order to support vulnerable, low-income consumers. This was implemented in April 2017¹⁶.

⁷ www.business electricity prices.org.uk/retail-versus-wholesale-prices

⁸ www.energybrokers.co.uk/gas/historic-price-data-graph.htm

⁹ https://www.ofgem.gov.uk/system/files/docs/2016/08/retail_energy_markets_in_2016.pdf

¹⁰ Scottish Government (2016) Energy in Scotland

¹¹ www.ofgem.gov.uk/environmental-programmes/eco/energy-suppliers

¹² Suppliers outwith the Big Six

¹³ Cornwall energy (2015) Domestic energy market snapshot 31 October 2015

¹⁴ www.ofgem.gov.uk/consumers/energy-supplier-comparison-data/compare-supplier-performance-complaints

¹⁵ Citizens Advice, Citizens Advice Scotland (2016) The Citizens Advice Service- Response to CMA's provisional decision on remedies

¹⁶ <https://www.ofgem.gov.uk/gas/retail-market/market-review-and-reform/implementation-cma-remedies/prepayment-meter-price-cap>

Whilst this is a positive step-forward, we would like to see monitoring of the effectiveness of this measure. This point is of particular importance to Scottish consumers as there is a higher proportion of consumers using the prepayment method for standard electricity than the overall UK level¹⁰. As highlighted by our Poverty Premium report¹⁷ consumers using prepayment meters face higher costs than those using other payment methods. In Scotland consumers of electricity using prepayment meters face 9% higher bills than those using direct debit payments (10% for gas bills)¹⁰. Case studies brought to the Citizens Advice service throughout 2015-16 show the high level of detriment consumers face when they are unable to top up their prepayment meter and disconnect from their energy supply.

20. More widely, the CMA identified significant consumer detriment as a result of suppliers' differential pricing – the majority of suppliers charge more to those who have not switched, while offering their best deals for those who engage in the market. CMA research, in common with our experience, suggests that vulnerable and low income consumers are more likely not to switch, and therefore to be paying higher prices. However, the CMA did not identify remedies to address this concern directly, preferring instead to rely on a programme of switching promotion. While we support switching as one means of reducing prices in the current market, we remain concerned that many consumers will continue to pay higher prices. Evidence should continue to be gathered over the coming months and years to assess whether voluntary switching is effective. If evidence shows that this measure is not working we would like to see this issue addressed through a more reliable process than voluntary switching.

21. With 31% (748,000) of Scottish households currently in fuel poverty, the Scottish Government's target of eradicating fuel poverty by November 2016 as far as reasonably practicable has not been met¹⁸. The number of households estimated to be in extreme fuel poverty is 8.3% (203,000 - based on the latest figures from the Scottish House Condition Survey 2015, published in Dec 2016)¹⁹. The high number of cases of fuel poverty detriment reported through CABs and the EHU also suggest this issue is as prevalent as ever. However, the greater devolved powers coming to the Scottish Government from 2017 present an excellent opportunity to better target funding and household energy efficiency measures to reduce fuel poverty, in line with the recommendations from the Scottish Fuel Poverty Strategic Working Group and the Rural Fuel Poverty taskforce, to which the CFU were members.

22. In terms of customer satisfaction with their fuel suppliers, 2015-16 continued to see a high proportion of customer complaints about Scottish Power – largely focussed on billing problems. This reflects the effect of Scottish Power's technical issues in moving customers to a new IT database which prompted numerous complaints in 2014-15. Scottish Power remained in the bottom 25% of suppliers in the Citizens Advice customer service league table at the end of April 2016²⁰. Following an investigation by Ofgem, Scottish Power were fined £18million for a number of customer service failings²¹.

¹⁷ Citizens Advice Scotland (2016) Poverty Premium

¹⁸ <http://news.scotland.gov.uk/News/Fuel-Poverty-Strategic-Working-Group-25cd.aspx#downloads>

¹⁹ Scottish Government (2016) Scottish House Condition Survey 2015

²⁰ www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/energy%20suppliers%202016/Energy%20Supplier%20Performance,%20Jan%20-March%202016.pdf

²¹ www.theguardian.com/business/2016/apr/26/scottish-power-fined-18m-pounds-for-poor-customer-service-ofgem

Other suppliers continue to have a poor performance in relation to complaints and in the same league table (comprising 20 suppliers), iSupply, npower, Co-operative Energy and Extra Energy all performed worse than Scottish Power²².

23. As was highlighted in the CAS 2014-15 Advice in Detail report²³, one of the principal contributing factors that led to consumers using the Citizens Advice Service being unable to pay their energy bills, relates to problems in the social security system. In 2015-16 clients continued to face issues with social security payments associated with changes made under the Welfare Reform Act²⁴. Delays related to appointments, extremely long call waiting times and appeals can all lead to clients not receiving payments, hampering their ability to keep up with their energy bills. For clients who use prepayment meters this can lead to disconnection and in some cases extreme detriment.

²² League table based on weighted complaints made to the independent bodies, who are the Citizens Advice Consumer Service, The Extra Help Unit and the Ombudsman Services: Energy

²³ Citizens Advice Scotland (2015) Advice in Detail 2014/15

²⁴ www.legislation.gov.uk/ukpga/2012/5/contents/enacted/data.htm

Energy Advice across all services 2015-16

24. The Citizens Advice Service network in Scotland refers to Scottish CAB, the Citizens Advice Consumer Service and the Extra Help Unit. In 2015-16 the network advised on a total of 28,610 energy issues²⁵ from Scottish consumers. This represents an increase of 2% from the previous year. Of the 28,610 issues:

- o CAB energy issues increased by 5% from 22,051 to 23,237.
- o Citizens Advice Consumer Service advised on 12% fewer energy issues compared to 2014-15; decreasing from 4,799 to 4,210 in 2015-16.
- o The EHU saw a small increase in the number of Scottish complaints advised on, rising from 1,150 in 2014-15 to 1,163 in 2015-16 – a 1% increase.

Type of advice service	2013-14	2014-15	2015-16	% difference between 2014-15 & 2015-16
CAB	18,330	22,051	23,237	↑ 5%
CACS	2,987	4,799	4,210	↓ 12%
EHU		1,150	1,163	↑ 1%
Total energy-related issues advised on in Scotland	21,101	28,000	28,610	↑ 2%

²⁵ This refers to 'new' issues, the CAB service also provides advice on 'repeat' issues (clients who have come back for more advice on the same issue)

The key changes in energy advice provision by service for 2015-16 compared with 2014-15 are highlighted below:

Citizens Advice Bureaux

Fuel Debt

	2014-15	2015-16	% change
All Fuel Debt issues	4,261	4,457	↑ 5%
Most common issue: Difficulty making payments	2,662	2,646	↓ 1%
Notable changes:			
Liability for debt	707	795	↑ 12%
Direct deduction from benefit	205	139	↓ 32%

Regulated Fuel

	2014-15	2015-16	% change
All Regulated Fuel issues	17,396	18,377	↑ 6%
Most common issue: Billing/meter reading	3,387	3,293	↓ 3%
Notable changes:			
Switching	1,152	1,500	↑ 30%
Complaints and redress	1,489	1,663	↑ 12%
Charges	1,390	1,553	↑ 12%

Non-regulated Fuel

	2014-15	2015-16	% change
All Non-regulated Fuel issues	394	403	↑ 2%
Notable changes:			
Charges	56	43	↓ 23%
Billing / meter reading	51	29	↓ 43%

Citizens Advice Consumer Service

	2014-15	2015-16	% change
All CACS energy issues	4,799	4,120	↓ 12%
Most common issue: Billing errors	1,981	1,765	↓ 12%
Notable changes:			
Information	1,064	867	↓ 23%
Metering	610	692	↑ 12%
Debt/disconnection	457	317	↓ 44%

Extra Help Unit

	<u>2014-15</u>	<u>2015-16</u>	<u>% change</u>
All EHU energy cases	1,150	1,163	↑ 1%
Most common issue: Billing errors	430	424	↓ 1%
Notable changes:			
Transfer	78	120	↑ 54%
Prepayment meter	96	61	↓ 36%

Data - Contents

Data derived from Citizens Advice Bureaux (CAB), Citizens Advice Consumer Helpline (CACS) and the Extra Help Unit (EHU) are categorised as shown below. The list of section headings are not comprehensive to the issues raised but only represent issues that have been selected for case study.

1. CAB	1.1 Fuel Debt 1.2 Regulated 1.3 Non-regulated	1.1.1 Difficulty Making Payments 1.1.2 Liability for debt 1.1.3 Welfare reform and social security admin 1.1.4 Direct deductions from social security 1.2.1 Billing/meter reading 1.2.2 Warm Homes Discount 1.2.3 Complaints & redress 1.2.4 Supplier not responding to appointments 1.2.5 Charges 1.2.6 Smart Meters 1.3.1 General
2. CACS	2.1 Billing Error 2.2 Information 2.3 Metering 2.4 Debt/disconnections 2.5 Transfers	2.1.1 Back-billing / Catch up bill 2.1.2 Responsibility for debt 2.1.3 Failure to refund 2.2.1 Switching supplier 2.2.2 Standing charges 2.2.3 Small businesses 2.3.1 Meter provision or exchange 2.3.2 Metering accuracy 2.3.3 Meter reading and data collection 2.4.1 Prepayment self-disconnection 2.4.2 Debt recovery process 2.4.3 Unsuitable or unaffordable debt repayment scheme 2.5.1 Problems arising from contracts 2.5.2 Erroneous transfers 2.5.3 Failure to correctly apply for transfer
3. EHU	3.1 Billing errors 3.2 Metering 3.3 Debt / disconnection 3.4 Transfers 3.5 Prepayment meters	

1. Scottish Citizens Advice Bureaux

25. This section is structured to examine each of the three main CAB energy categories individually. The categories are:

1. Fuel debt
2. Fuel - regulated
3. Fuel - non-regulated

Each of the three categories included above can be further broken down into a number of advice codes. Multiple advice codes can be assigned to one case, as client issues may be multifaceted and complex. This means that one consumer may have issues that fall into a number of categories, meaning the number of consumers raising issues will be less than the total number of issues raised.

Within this report the figures used capture each energy issue advised on by referring to the advice codes recorded the first time a client presents with an issue. This means that if a client attends their local CAB more than once for advice on the same issue it is only counted once.

Data from the Scottish Citizens Advice Bureaux

Overall, the Scotland CAB network provided advice on 23,237 energy issues in 2015-16. The table below shows how these issues are split between the broad categories of level 1 and 2 advice codes.

Level 1 advice code	Level 2 advice code	Number of issues recorded in FY2015-16
Debt	Fuel debts - non regulated (coal, natural gas, oil etc.)	206
	Fuel debts - regulated (gas, electricity)	4,251
Utilities and communications	Fuel - non regulated (coal, natural gas, oil etc)	403
	Fuel - regulated (gas, electricity)	18,377
Total number of energy-related issues advised on		23,237

Key Issues advised on by Scottish CAB

1.1 Fuel Debt

26. Consumers in Scotland visited their CAB with 4,457 fuel debt issues in 2015-16. This was an increase of 5% compared to the 4,261 issues raised in 2014-15. These figures are in line with national debt data that showed that consumer debt to energy suppliers was 9% higher in 2015 compared to 2014, with an average debt per household of £130²⁶.

27. Issues categorised as fuel debt predominantly relate to a household's ability to pay for their energy bills. When households are on tight or fixed incomes, any variation in their energy bills can make it difficult for them to make payments. Case evidence shows that issues also relate to households questioning whether they are responsible for money owed on their account i.e. debt liability, or issues with the debt reclamation process. In the most serious of cases this can lead to threatened and actual disconnection of supply.

28. For the first time fuel debt issues raised at CABs have been categorised into regulated fuel issues and non-regulated fuel issues. In the following statistics the two categories have been amalgamated to allow comparison with the previous year. One new category which only applies to regulated fuel issues is prepayment meter standing charges, which is a new category for 2015-16.

29. Table 1 presents the number of issues brought to the bureaux per fuel debt category in 2015-16 compared to 2014-15. Categories are listed in descending order with the fuel debt category that recorded the highest number of issues listed first. Chart 1 also shows this data in graphical form to allow comparison between categories.

Below a summary of the key findings from the statistics are given:

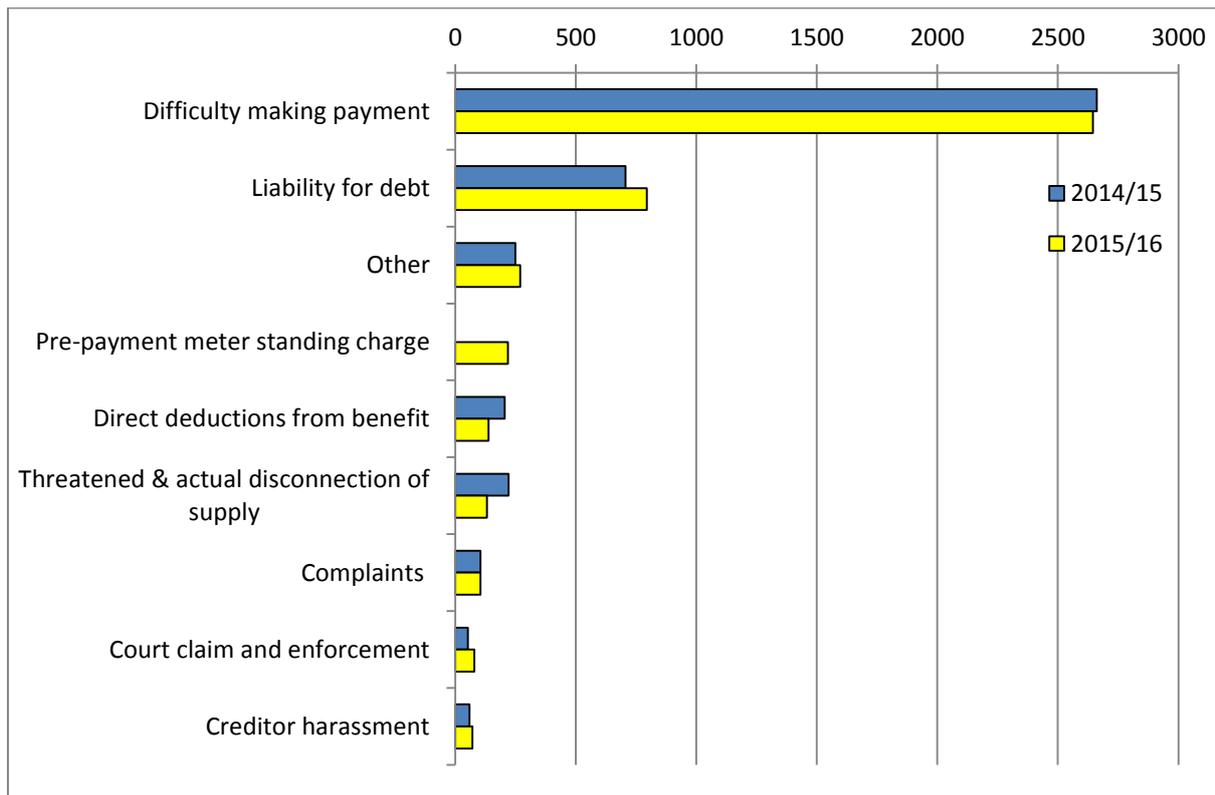
- Issues relating to difficulty making payments and liability for debt remained the most common issues raised with 2,646 and 795 issues respectively. While there was only a 1% increase in issues raised about difficulty making payments, the number of issues relating to liability for debt increased by 12% from 2014-15 to 2015-16.
- Notable increases in issues included those related to court claims and enforcement issues which rose from 53 to 80, a 51% increase and creditor harassment issues which increased from 59 to 71, a 20% rise.
- The most significant drop in issues from 2014-15 to 2015-16 was with issues relating to threatened and actual disconnection of supply which decreased from 221 to 132, a change of 40%.

²⁶ www.uswitch.com/media-centre/2015/06/consumers-owe-energy-suppliers-507m-43m-more-than-last-year/

Table 1: Number of fuel debt issues

CAB Advice code	2014-15	2015-16	% change
Difficulty making payment	2,662	2,646	↓ 1%
Liability for debt	707	795	↑ 12%
Other	249	270	↑ 8%
Prepayment meter standing charge		219	
Direct deductions from benefit	205	139	↓ 32%
Threatened & actual disconnection of supply	221	132	↓ 40%
Complaints	105	105	
Court claim and enforcement	53	80	↑ 51%
Creditor harassment	59	71	↑ 20%
Total	4,261	4,457	↑ 5%

Chart 1: Fuel debt issues by advice code for 2015-16 compared to 2014-15



1.1.1 Difficulty making payments

30. The majority of fuel debt issues raised at CAB (59%) related to difficulty making payments. This was a 1% decrease in issues compared to 2014-15. Consumers that are having difficulties making payments towards their energy bills can be experiencing a variety of complex issues which impact their budget and limit their ability to afford essential services.

Below a number of case studies are presented which highlight the nature of issues clients face when trying to pay their energy bills. As mentioned in the introduction, cases are often multifaceted and can be caused by a range of reasons.

Case 1) A CAB in the north east of Scotland advised a client who is struggling with her current repayment plan and would like to change supplier but is unable to because of arrears.

- *The client owed her supplier £349.53 for gas arrears. She has a card meter and a payment plan was arranged with the energy supplier that they would take £4 off the arrears on a Monday and Wednesday each week when she tops up her meter with £15-£20. On Monday her gas went off and when she tried to top up her meter the gas remained off and the display indicated that she owed £449. She has had no notice from her supplier that she was going to be cut off and needed help resolving this problem as she relies on gas for her hot water, heating and cooking.*

31. In the above case study the lack of ability to make payments has led to the client's gas supply being shut off. For people in vulnerable situations this can be extremely serious.

Case 2) A CAB in Central Scotland advised a client who is struggling to pay his bills and is in fuel poverty. The client is unable to work due to illness and lives in a council flat which only has electric heating.

- *The client who is on assessment Employment and Support Allowance often has to spend his food budget on electricity or turns off his central heating in favour of a halogen heater and a coat. He also attends the library or the job club in order to get a cup of coffee and some heat without having to use his electricity at home. The client also has concerns about debt and is worried that he may be arrested or have items removed from his home if he doesn't repay his debt.*

1.1.2 Liability for debt

32. Issues relating to liability for debt accounted for 18% of fuel debt issues brought by clients to the CAB service, the second most common fuel debt issue. Scottish Citizens Advice Bureaux were visited by a number of customers who felt that they were not responsible for energy bills being sent to them. In some cases the clients had moved out of a property during the billing period, did not have an account with the supplier trying to collect the debt, or had received bills that were far higher than expected for the client's usage.

Case 1) A West of Scotland CAB advised a client who has received a letter from a debt collector saying that she owes a substantial amount of money for gas supplied to a property over a time period when she was not a resident there.

- *The client has received a formal demand from a debt collector looking for payment of gas supply totalling £1,713.37 with interest. The client has emails to confirm her tenancy dates for the address supplied. The client feels the debt is not her responsibility and that any further correspondence or recovery should be stopped.*

Case 2) A CAB in the West of Scotland advised a client who received a warrant from her supplier, to enter her home and install a prepayment meter for a debt that did not belong to her.

- *The client received a warrant through her letterbox from her supplier to enter her home and install a prepayment meter due to debt of £217.50 for gas. The client does not have a gas account with the supplier. The client phoned the supplier and informed them of this information. She was advised by the supplier that they would amend their records. However the client has again received a final bill for £217.50 for a gas account.*

Case 3) A Central Scotland CAB advised a client who has received a large bill from her supplier which appears to be based on estimated meter readings. She lives on her own in a one-bedroomed flat which is a private let; her house is insulated and double glazed with a relatively new boiler which is in good working order. She is in receipt of ESA and recently underwent surgery for cancer. She has asked for assistance in applying for a charitable grant.

- *The client received a bill from her supplier dated 18 Jan for the billing period 9-Dec – 18 Jan for £4217.88. She confirms that she has not received any notification from her supplier or any evidence that meter readers have called to the property.*

1.1.3 Welfare reform and social security administration

33. Issues relating to social security payments caused issues for clients throughout 2015-16 and impacted some peoples' ability to pay for essential services, resulting in the accrual of fuel debt. Some of the clients presenting at bureaux appeared to have fallen through all of the social security safety nets and had been left without any income for extended periods of time. The cases below outline various issues experienced as a result of problems with social security administration:

Case 1) A Central Scotland CAB advised a client who had incurred fuel debt while waiting 10 weeks to be put onto Universal Credit. Although his fuel debt was low it meant that he had no electricity for two days.

- *The client put in £11 to his prepayment meter but it was 'rejected' as he owed £1.77. Since going onto Universal Credit he has been paying off the debt he had accrued while waiting over 10 weeks to go onto Universal Credit. This has meant that the client struggles every month to make ends meet. The client had applied to the Scottish Welfare Fund for a crisis grant however the client was refused the crisis grant yesterday.*

Case 2) Another client visited an East of Scotland CAB with issues relating to the waiting period for the processing of Universal Credit applications.

- *The client had tried to claim universal credit online the week before and had a problem completing his claim. A DWP adviser took his claim for universal credit over the telephone. The client returned two weeks later as he had not heard how his claim was progressing and had received an appointment with his local job centre. The client received a food parcel last week. The client now states that he is down to £1 on his electricity meter and is struggling financially.*

Case 3) A CAB in the North East of Scotland advised a client who came into the bureau as he has no money on his electric meter and is struggling to make ends meet as he is waiting for an ESA payment. He can't heat his home and hasn't eaten for two days.

- *The client has amassed a debt on his gas and electricity as he was in prison for a time. The gas debt is around £1000 and the debt on his electric meter is around £700. He has £6.57 left on his emergency supply.*

1.1.4 Direct deductions from social security

34. Although still in the top 5 of fuel debt categories, the number of issues relating to 'direct deduction from social security' decreased from 205 in 2014-15, to 139 in 2015-16. When a benefit claimant accumulates utility bill arrears, it is possible for the Department of Work and Pensions (DWP) to recover the supplier's debt directly from the benefit at source (via a third party). This is known as 'Fuel Direct'. The amount directly deducted from the benefit payment (for a variety of Third Party Deductions that can include gas/water/electricity consumption as well as arrears) can be up to 25% without the claimant's consent, and even higher if the claimant does consent to it. Direct deductions from benefits can be both a trigger of acute income deprivation, and also a consequence of it, resulting in people having to seek crisis support or emergency food aid²⁷.

Below a number of case studies are presented which highlight the nature of issues clients face when deductions are taken directly from their social security payments.

Case 1) A CAB in South West Scotland advised a client who is unemployed and struggling to pay for bills after direct deductions from his Job Seekers Allowance benefit.

- *The client has received a letter from a debt collection agency about unpaid gas bills totalling £120, inclusive of costs. He is at present unemployed but is having £10 per week deducted from his JSA and is struggling to pay bills.*

Case 2) A CAB in Central Scotland advised a client who is struggling to make ends meet after her fuel direct deduction from her benefits was increased due to arrears.

- *The client has various deductions from her benefit - fuel direct, council tax at £3.70 per week, water and sewerage arrears at £3.70 per week and on-going water and sewerage at a further £3.70 per week. This is placing financial pressure on her already limited budget.*

Case 3) A CAB in Central Scotland advised a client who has combined fuel debts of over £1,000 and had been threatened to be taken to court by his supplier. The client is in receipt of Personal Independence Payment (PIP) enhanced daily living and enhanced mobility, Employment Support

²⁷ Citizens Advice Scotland (2016) Living at the sharp end

Allowance, Housing Benefit and Council Tax Reduction.

- *The client has both physical and mental health issues and had been struggling to apply for Third Party Deductions through Fuel Direct. The client, who is ex-army has been diagnosed with Korsakoff Syndrome due to his previous problems with alcohol misuse. The client also has mobility problems and requires use of a wheel-chair when outdoors. The client had tried to initiate Fuel Direct Third Party Deductions but had found the process too difficult.*

1.2 Regulated Fuel

35. In 2015 91% of Scottish homes were heated by mains gas or electricity²⁸. The provision of these fuels is regulated and as such the suppliers must adhere to standards designed to protect the interest of consumers. The regulated fuel category captures the advice provided by CAB on all issues relating to mains gas or electricity accounts.

36. Consumers in Scotland visited their CAB with 18,377 regulated fuel issues in 2015-16. This was an increase of 6% compared to the 17,396 issues raised in 2014-15. The advice covered in the regulated fuel category covers a wide range of issues including problems with billing, metering, switching supplier, accessing support schemes, complaints/redress and threatened or actual disconnection. The increase in the number of consumers is predominantly related to increases in issues with complaints and redress, charges and supplier switching.

37. Table 2 presents the number of issues brought to bureaux per regulated fuel category in 2015-16 compared to 2014-15. Categories are listed in descending order with the regulated fuel advice code that recorded the highest number of issues listed first. Chart 1 also shows this data in graphical form to allow comparison between categories.

Below a summary of the key findings from the statistics are given:

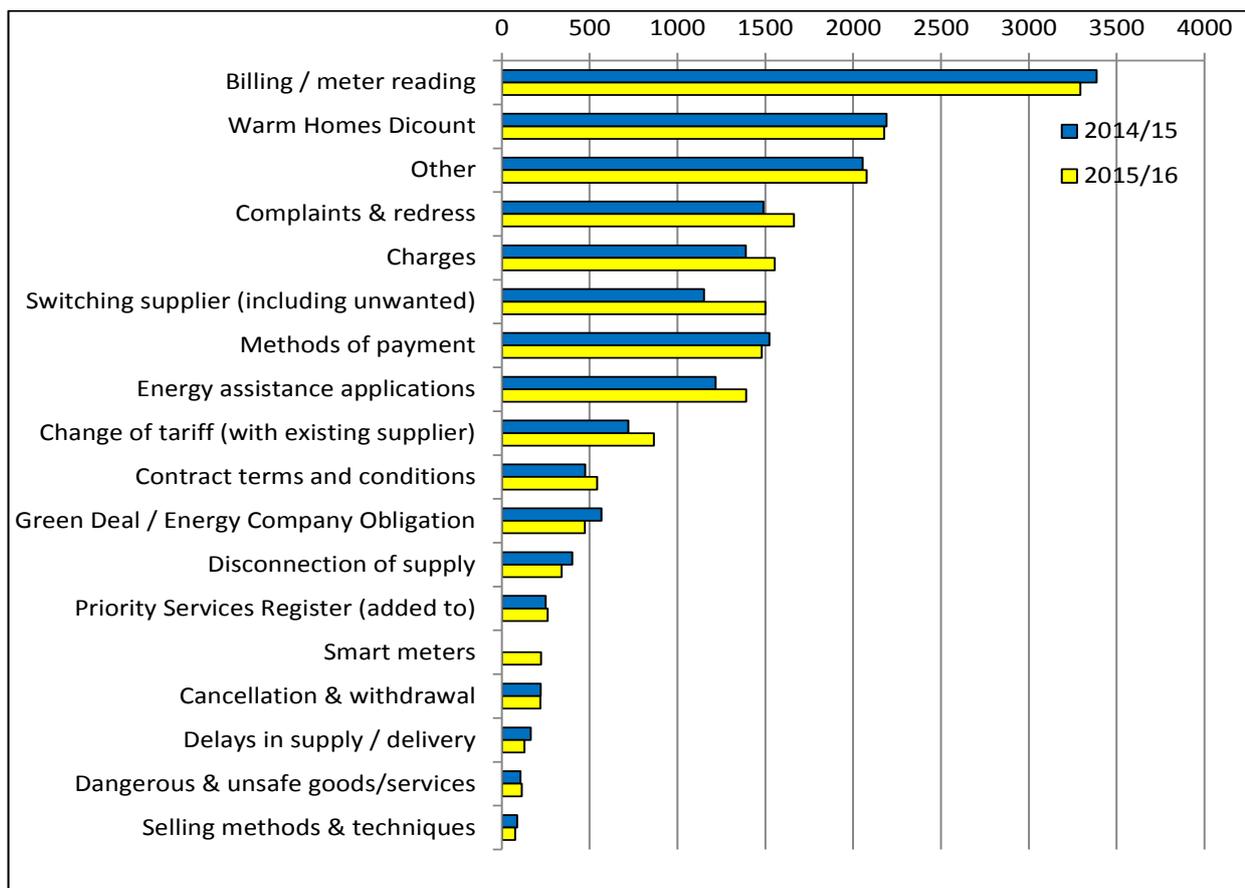
- The most commonly reported issues were billing and meter reading and issues relating to the Warm Home Discount. However there was little change in the number of issues raised between 2014-15 and 2015-16 for these two categories. Billing and meter reading issues decreased from 3,387 to 3,293, a change of 3%. Warm Homes Discount issues decreased from 2,191 to 2,177, a change of 1%.
- 'Other' issues were the third most common issue and accounted for almost 12% of total issues. This category relates to a variety of different issues, and in 2015-16 included issues relating to specific supplier policies which CAB advisers queried, the suitability of specific tariffs, issues with information provision and the high price of energy.
- Issues relating to a change in supplier (including unwanted changes) increased by 30% from 1,152 to 1,500 in 2014-15 and 2015-16 respectively.
- Issues relating to changes in tariffs (with existing suppliers) increased by 20% from 720 to 865 in 2014-15 and 2015-16 respectively.
- A new issue for 2015-16 was smart meters which saw 224 issues raised.

²⁸ Scottish Government (2016) Scottish House Condition Survey 2015

Table 2: Number of regulated fuel issues

CAB Advice Code	2014-15	2015-16	% change
Billing / meter reading	3,387	3,293	↓ 3%
Warm Homes Discount	2,191	2,177	↓ 1%
Other	2,055	2,076	↑ 1%
Complaints & redress	1,489	1,663	↑ 12%
Charges	1,390	1,553	↑ 12%
Switching supplier (including unwanted)	1,152	1,500	↑ 30%
Methods of payment	1,523	1,480	↓ 3%
Energy assistance applications	1,218	1,391	↑ 14%
Change of tariff (with existing supplier)	720	865	↑ 20%
Contract terms and conditions	474	542	↑ 14%
Green Deal / Energy Company Obligation	567	472	↓ 17%
Disconnection of supply	401	341	↓ 15%
Priority Services Register (added to)	250	262	↑ 5%
Smart meters		224	
Cancellation & withdrawal	221	220	0%
Delays in supply / delivery	164	129	↓ 21%
Dangerous & unsafe goods/services	106	113	↑ 7%
Selling methods & techniques	88	76	↓ 14%
Total	17,396	18,377	↑ 6%

Chart 2: Number of regulated fuel issues by advice code for 2015-16 compared to 2014-15



1.2.1 Billing / meter reading

38. Issues around billing and meter reading affect all consumers in Scotland. However for those in vulnerable situations it can be extremely distressing to be faced with an unexpectedly high bill. In 2015-16 the majority of regulated fuel cases (18%) related to billing and meter reading. Clients seeking advice on billing and metering issues reported a variety of problems such as supplier errors, including administrative errors, incorrect or unclear bills and inaccurate meter readings.

Below a number of case studies are presented which highlight the nature of issues clients face in relation to billing and meter reading.

Case 1) A Southern Scotland CAB advised a customer who had recently lost her husband, who used to deal with household bills. She has been sent a number of confusing letters by her supplier who initially said her account was in credit but now she has been told that she cannot claim the credit.

- *The client was initially sent an invoice that showed that she has a credit of a £1,410.65 and is paying a direct debit of £123 pm. She was then sent a second invoice that does not give a credit balance but reduces her DD to £52 pm. In addition she was told on the phone that she has not paid any electricity. She was also told that she could not claim the credit balance. She lives in a 2 bed small bungalow, and has supplied up to date meter readings. She would like to have the credit balance, and to know what her DD is and that she has paid for electricity. She said she has been kept awake at night with the worry.*

Case 2) A Central Scotland CAB advised a client whose husband had died two years previously. Since the name was changed on the account the supplier has tried to increase her direct debits substantially.

- *The client has always paid a direct debit of £80 a month. There was then an error and the supplier stopped taking the direct debits. When they started again the amount was £116. This is what the client has been paying all this year and is now up to date. However they are now looking for £198 a month based on a personal projection of £984 for the next year. There does not appear to be a good reason for this increase, as based on the projection she should only be paying £82 a month.*

The client has tried to switch supplier but they can't take her because she is on a 3 tier tariff.

Case 3) A Central Scotland CAB advised a client who is representing her son who has learning difficulties and had received extremely large electricity bills from his energy supplier. The client is vulnerable and this is causing her stress.

- *The client came to the bureau for assistance as her son had received an electricity bill for £10,746.06 for 1 quarter. After a few phone calls to the supplier the CAB were told that this was under investigation but that it was likely there had been a mistake and to ignore the charge. The CAB then received a phone call a few days later to say that they needed more information and that the matter had not been resolved.*

The client returned to the bureau in September with another bill, this time for £3,211 for the period May 2014 to June 2015. Again the CAB were told that a meter reading appointment would be arranged. There is still no resolution to this.

Case 4) A CAB in Central Scotland advised a client who had received a number of differing bills after an engineer was sent out to take a meter reading.

- *The client said that an engineer came to her premises and took a meter read however she has subsequently had numerous differing bills, on one occasion she received 11 in the one day. The client said she has no idea what is going on and is feeling more and more distressed by the matter.*

39. For many clients it can be distressing when they receive large bills that often appear without any warning from the supplier. Often this is due to the supplier's administrative inefficiencies and can lead to significant anxiety for consumers.

1.2.2 Warm Home Discount

40. In 2015-16 the volume of Warm Home Discount (WHD) issues decreased by 1% from 2,191 cases in 2014-15 to 2,177 cases in 2015-16. However WHD issues were still the second most common issue raised at CABs with 12% of all energy related issues. As in 2014-15 clients experienced a number of issues with this scheme, including barriers to access, a lack of clear eligibility criteria outwith the core group, which can vary between suppliers, and digital exclusion as a result of online applications.

Another issue with the discount is ensuring that hard to reach clients are aware that it is available to them. It also appears that some clients are unaware that not all suppliers offer the scheme, which can cause issues when they switch supplier to access the best deals.

Below a number of case studies are presented which portray how some of the issues have affected clients who visited their Citizens Advice Bureau.

Case 1) An East of Scotland CAB advised a young male client who has a mental illness but was told by his energy supplier that he could not apply for the Warm Homes Discount because their allocation for the year was full.

- *The client has applied for the Warm Home Discount Scheme and when he previously phoned his supplier, he was told his application had been unsuccessful. The client had received a payment through the scheme for the previous 2 years when he was with a larger supplier. Having switched to a smaller supplier he assumed he would still be eligible.*

His energy supplier has said they only give the discount based upon applications to the Warm Home Discount Scheme and they have filled their allocation for this year. The Warm Home Discount Scheme Helpline says they only give payments based upon eligibility for Pension Credits and all other payments or credits are at the discretion of individual energy suppliers.

This case highlights how vulnerable consumers, who are eligible for the scheme in theory, can be left without support due to supplier payment limits.

Case 2) A Central Scotland CAB advised an elderly client who had received a letter confirming that she had been allocated the Warm Home Discount but had not received any payment.

- *The client returned to the bureau regarding the Warm Home Discount, concerned again as she has received her letter stating she was to get the WHD but has not yet received the £140 credit into her account. The client was very anxious and upset as she states this happens every year and she needs to come to the bureau for assistance.*

Case 3) A Central Scotland CAB advised a client who was unable to work due to long term illness and whose day to day activities are limited a lot by illness. She is widowed and previously cared for her ex-army serving husband.

- *The client is a female, single parent with two children and lives in council rented accommodation. The client has had problems with relatives and neighbours where she lives for some time and was moved to homeless accommodation. She was at this address for 10 months and was paying her electricity at £20 per week to a prepayment meter. The client has now received a bill for £88.77 for electricity to this property. The total amount owed has risen to £102.09. This is as a result of the account has been passed onto a credit agency as the client has not paid the outstanding bill. She does not think she owes this amount as she was paying for her electricity at £20 per week.*

The client is due Warm Home Discount but this has not been credited to her electricity account.

As in case study 1 above, the client might well be eligible but will not automatically receive payment.

Case 4) A CAB in the North of Scotland advised a client who had switched supplier and was told that the new supplier was not a participant in the scheme. The client is unable to work due to a long term illness/disability and is in fuel poverty.

- *The client received the WHD with her previous energy supplier. When she switched to a smaller supplier to access the most economical tariff she was told that the new supplier was not a participant in the scheme. The client feels that by switching supplier she might end up spending more on her bills as she cannot access the WHD. The client now wants to switch back to a larger supplier who is a participant in the WHD scheme.*

1.2.3 Complaints and redress

41. A large number of clients went to their local CAB with issues regarding complaints with their energy suppliers. Issues relating to regulated fuel complaints accounted for 9% of all regulated fuel issues raised at bureaux. Advisers reported of clients spending large periods of time on the phone before their complaints could be formally logged. In some cases advisers also reported that after going through this process the supplier then had no record of a complaint being logged. If a complaint is not formally logged then it is not officially recorded and won't appear in a supplier's direct complaints figures. This is known as the 'resolution gap' and has been identified by OFGEM as an ongoing issue²⁹.

As is highlighted in the case studies below suppliers often did not fulfil their pledges of redress when complaints had been raised and errors accepted by the supplier.

Case 1) A Central Scotland CAB advised a client who had been having ongoing billing issues with her supplier after replacement meters were installed in her sheltered housing complex.

- *An investigation was started after the local MSP became involved. The supplier's External Relationship Manager agreed that all clients in the sheltered housing that had been wrongly billed would receive 25% discount on all bills and a £20 good-will voucher. Even after this was arranged neither promised action has materialised and further incorrect bills were sent to the household for double the actual amount of energy used. The supplier now has no record of the initial complaint but has admitted that a major issue is present.*

Case 2) A CAB in the North of Scotland advised a client who had been billed for £600 after the supplier cancelled her direct debit.

- *After moving properties and switching supplier the client was still receiving bills for varying amounts between £600 and £1,700. After phoning the supplier she was told to ignore the bills as they were computer generated and they had had a glitch in their computer system. After presenting the issue to the Energy Ombudsman they suggested the supplier should offer her £150, a written apology and the offer of a prepayment meter. To date none of this has been done.*

²⁹ OFGEM (2016) Complaints to energy companies research report 2016.

1.2.4 Supplier not responding to appointments

42. A Central Scotland CAB advised a client who was trying to have prepayment meters installed in a property she had recently moved into. The supplier has missed 4 scheduled appointments to install the meters and is not responding to complaint letters.

- *The client came into the Bureau as she moved into a new rented property in December. The client telephoned the supplier prior to moving in, to advise them she was moving and that she would like a prepayment meter. The client moved in and has made 4 appointments to have this installed but no one has turned up for these appointments. The client has hearing difficulties and has tried to phone her supplier on numerous occasions and has received a £80 phone bill. The client has written to her supplier on three occasions and has not received a response.*

1.2.5 Charges

43. In 2015-16 issues related to charges accounted for 9% of all regulated fuel issues raised at bureaux. This is an increase of 12% compared to 2014-15. As in 2014-15, the introduction of standing charges onto regulated fuel tariffs is still causing a number of issues for clients who are being charged for gas even though they don't use any gas within their property.

Case 1) A CAB in Southern Scotland advised a client who lives in a housing association property and had been billed for gas for the first time since moving into the property 16 years ago.

- *The client phoned to enquire about a £170 gas bill from her supplier. The client is a tenant of a social landlord and has lived in the property for 16 years. During this time she has never used any gas appliances even though there was a gas meter in the property. She had phoned her supplier who told her that these were standing charges which were imposed after the 'appointment of a new ombudsman'. She has spoken to her social landlord who told her to ignore the bills, however, the supplier is due to come to the house to replace the old meter with a prepayment meter.*

Case 2) A CAB in Central Scotland advised a client who was being charged a standing charge for gas even though his gas meter was disconnected and sealed three years previously.

- *The client requested that his supplier remove his gas meter 5 years ago as he did not use gas. His meter was disconnected & sealed 3 years ago. However because the meter was still physically there he was subject to standing charges. The client has been reluctantly paying the standing charges over this time. The client has requested physical removal of the meter but the supplier has failed to remove it. The client is also frustrated as he does not have a landline phone and is spending a large amount of money phoning from public call boxes. After visiting his CAB the supplier eventually removed his gas meter.*

1.2.6 Smart Meters

44. In 2015-16 224 issues related to smart meters were raised at bureaux. While this is a small number in comparison to other issues raised, this is a new category. The smart meter rollout - currently set to be completed by 2020³⁰ – means that there will be a very large increase in smart meter installations in coming years. Whilst a code of conduct exists for engineers who are fitting smart meters, it must be ensured that this is adhered to. Particular effort must be made to ensure vulnerable clients such as those on the Priority Service Register (PSR), are supported in the smart meter roll out. Along with issues around support and advice, clients also reported more concerning issues:

A Central Scotland CAB advised a client who was subject to an erroneous transfer under the guise of the smart meter roll out. The client has been in ill health and was approached at home by the small supplier in September 2015. They said they were fitting smart meters in the area and gave the client the impression that their company was similar to a transmission company.

- *The client signed a contract with the small supplier without being informed that this involved switching supplier. The client then received a letter from his previous supplier informing him that they were transferring his gas supply to a new supplier. The client has a dual fuel account and pays by pre-payment meter. The client received a text from the new supplier informing him they would fit new meters in November 2015. As the client would be paying a higher tariff with the new supplier he requested assistance in returning to his previous supplier.*

³⁰ Consumer Futures Unit, Citizens Advice Scotland (2016) Smart Move – Taking stock of the smart meter rollout programme in Scotland

1.3 Non-regulated Fuel

45. In Scotland around 9% of households are heated by non-regulated fuels such as heating oil, coal and liquefied petroleum gas (LPG). Unlike consumers purchasing electricity and gas, there is limited protection for consumers using un-regulated fuels. However the volume of non-regulated fuel issues brought to bureaux is generally quite low.

46. Consumers in Scotland visited their CAB with 403 non-regulated fuel issues in 2015-16. This was an increase of 2% compared to the 394 issues raised in 2014-15. The lower proportion of non-regulated fuel issues may, in part, be attributed to the rurality of many non-regulated fuel households and may also reflect awareness amongst clients of the lack of regulation of these fuel types, discouraging them from seeking advice.

47. The non-regulated fuel cases presented at bureaux often reflect serious issues. Clients commonly report that they struggle to afford to heat their property with non-regulated fuels. Heating oil prices typically follow crude oil prices and whilst this has largely been on a downward trend since the highs of 2012-13 there are seasonal spikes³¹ and the volatility of prices makes it hard for consumers to budget. The cost of filling an oil tank to full is often outwith a client's budget, leaving them with limited options for heating. In some instances this may result in households relying on alternative heating sources, such as electric heaters or a coal fire, which may not provide sufficient heat and can be a more expensive means of heating a property.

48. Table 3 presents the number of issues brought to bureaux per non-regulated fuel category in 2015-16 compared to 2014-15. Categories are listed in descending order with the regulated fuel advice code that recorded the highest number of issues listed first. Chart 3 also shows this data in graphical form to allow comparison between categories.

Below a summary of the key findings from the statistics are given:

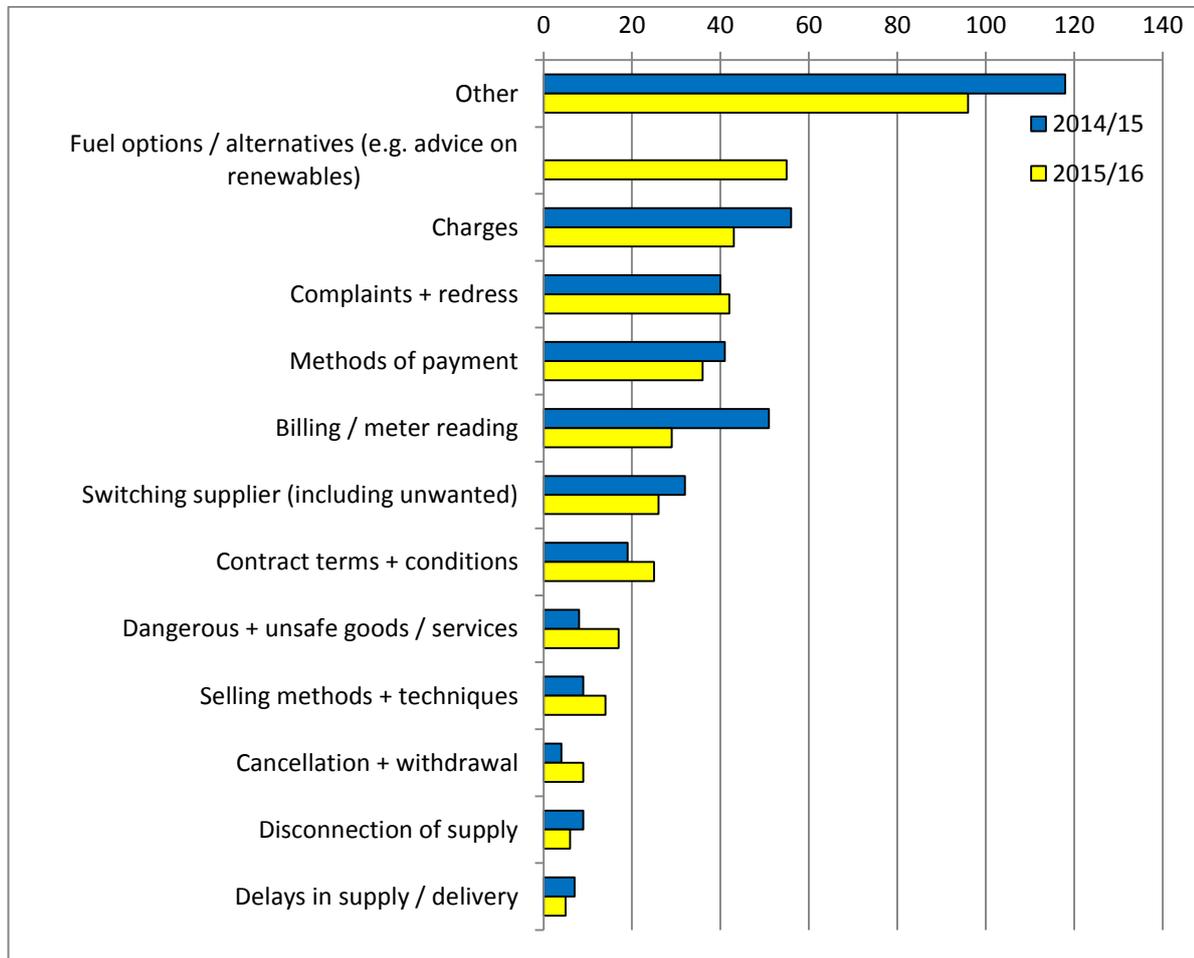
- With 96 issues logged, the most common non-regulated fuel category was 'other'. In 2015-16 case notes for non-regulated fuel cases categorised as 'other' largely reflected the lack of financial support and access to schemes to help clients that rely on non-regulated fuels for heating to upgrade or replace their system.
- For the first time bureaux started to record cases in 2015-16 where alternative fuels were advised upon (such as domestic renewable energy systems). A total of 55 issues were advised upon in 2015-16.

³¹ www.boilerjuice.com/heating-oil-prices

Table 3: Non-regulated fuels

CAB Advice Codes	2014-15	2015-16	% change
Other	118	96	↓ 19%
Fuel options / alternatives (e.g. advice on renewables)	na	55	
Charges	56	43	↓ 23%
Complaints + redress	40	42	↑ 5%
Methods of payment	41	36	↓ 12%
Billing / meter reading	51	29	↓ 43%
Switching supplier (including unwanted)	32	26	↓ 19%
Contract terms + conditions	19	25	↑ 32%
Dangerous + unsafe goods / services	8	17	↑ 113%
Selling methods + techniques	9	14	↑ 56%
Cancellation + withdrawal	4	9	↑ 125%
Disconnection of supply	9	6	↓ 33%
Delays in supply / delivery	7	5	↓ 29%
Total	394	403	↑ 2%

Chart 3: Number of non-regulated fuel issues by advice code for 2015-16 compared to 2014-15



1.3.1 Case Studies: Non-regulated fuels

49. The case studies below highlight the issues with affordability for consumers reliant on non-regulated heating systems. As well as being un-regulated there is little financial support available for consumers using these expensive heating systems.

Case 1) A CAB in the North of Scotland advised a client who was unable to afford the minimum gas delivery in her rural home which is heated by off mains LPG.

- *The client suffers mental health issues and is in receipt of Employment Support Allowance, Council Tax Reduction and Housing Benefit. The client is also 15 weeks pregnant. The client is unable to afford the minimum gas delivery. Therefore the client has no hot water and has to heat her home with expensive electric heaters. There is no local supplier of LPG and she has no means to collect smaller amounts of LPG under 500 litres.*

Regardless of an individual's circumstances, suppliers of un-regulated fuel types are not required to assist individuals struggling to heat their home.

Case 2) A CAB in the Western Isles advised a client who has oil heating and is struggling to pay her bills.

- *The client is a long-term receiver of Job Seekers Allowance who does receive some charitable income. However she still struggles to pay water & sewerage, oil bill and phone bill. She is always overdrawn, and would be over the overdraft limit if not for the charity that helps her. The client says there is just too much to pay. She is trying to sell her inherited croft house and buy a cheaper house in an area where she can find work more easily, but is very anxious about estate agent & solicitor bills. She has used crisis grants and budgeting loans in the past.*

2. Citizens Advice Consumer Service

50. The Citizens Advice Consumer Service (the helpline) is a public helpline which has been jointly run by CAS and Citizens Advice England and Wales since 2012 to complement the face-to-face advice offered by the CAB network. Consumers in Scotland contacted the helpline with 4,210 energy issues in 2015-16. This is a decrease of 12% from the 4,799 issues advised on in 2014-15. The high call volumes in 2014-15 are largely a result of billing issues which were more prevalent than usual due to problems that Scottish Power and Npower had in migrating customers to a new billing system. The 12% decrease in calls handled by the helpline in 2015-16 may highlight that the number of billing issues related to Scottish Power and Npower have reduced, even though many complaints are ongoing and new issues are still widespread.

51. This report examines the top five helpline categories in greater detail, looking at the type of advice clients sought by presenting the advice codes for the top 5 helpline categories included in Table 4 below. The statistics are accompanied by case studies from specific calls that highlight typical or notable issues experienced by clients. Owing to the nature of the helpline, case notes tend to be recorded in short-hand. This enables the adviser to effectively engage with the client and to advise them efficiently. As such, the helpline case studies are generally less detailed than those from CAB and they have been edited from note form to provide a clearer narrative for inclusion in this report.

Issues advised on by the helpline

52. Table 4 and chart 4 present the breakdown of helpline issues by category in 2015-16 compared to 2014-15. In table 4 categories are listed in descending order with the category that recorded the highest number of issues listed first. Chart 4 also shows this data in graphical form to allow comparison between categories.

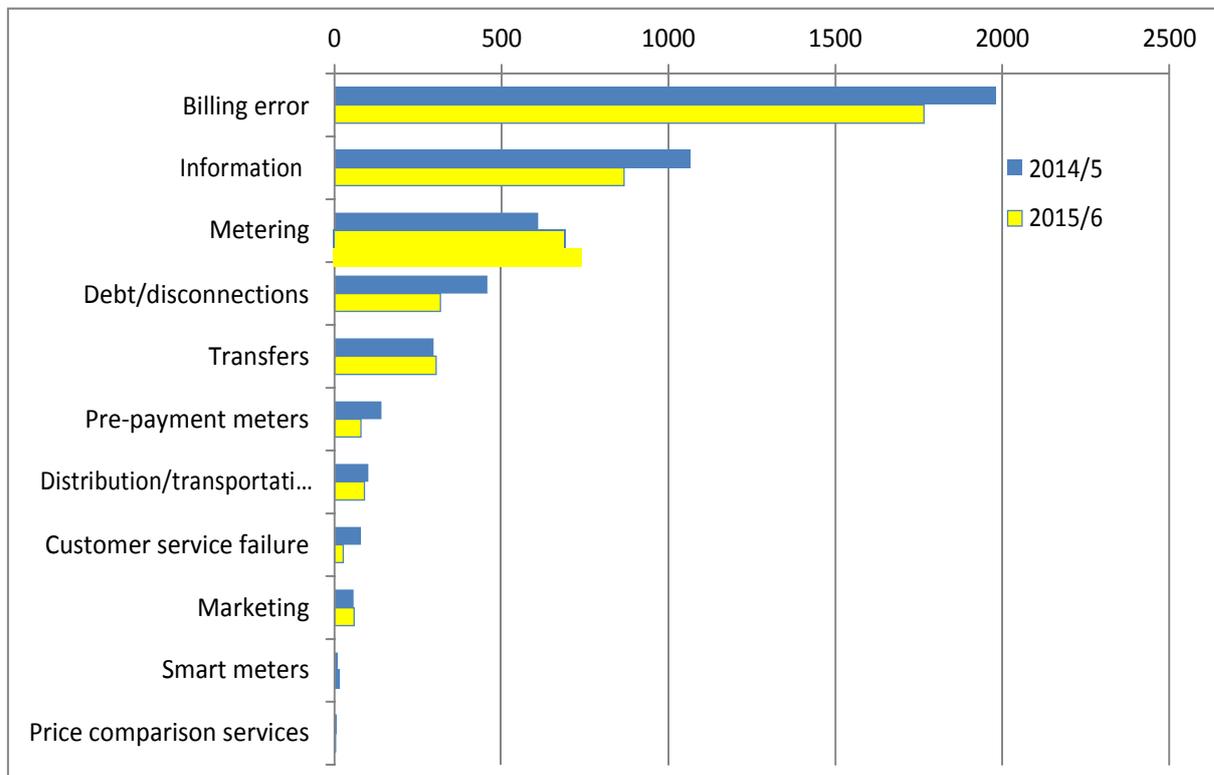
Below a summary of the key findings from the statistics are given:

- Issues with billing errors were the most common helpline enquiry in 2015-16. Billing error issues accounted for 42% of all helpline issues in 2015-16. Consumers contacted the helpline with 1,765 billing error issues which represented a 12% decrease in billing error issues compared to 2014-15.
- A key function of the helpline is to signpost consumers towards the information they require to enable them to resolve issues. Clients contacted the helpline with 867 information issues, a decrease of 23% compared to 2014-15.
- Metering issues were the third most common category in 2015-16. The helpline advised on 692 metering issues, an increase of 12% compared to 2014-15.

Table 4: Number of helpline energy issues

Helpline Advice Code	2013-4	2014-5	2015-6	% change between 2014-5 and 2015-6
Billing error	802	1,981	1,765	↓ 11%
Information	975	1,064	867	↓ 23%
Metering	276	610	692	↑ 12%
Debt/disconnections	233	457	317	↓ 44%
Transfers	174	296	304	↑ 3%
Prepayment meters	70	140	79	↓ 77%
Distribution/transportation	101	101	89	↓ 13%
Customer service failure	87	79	26	↓ 204%
Marketing	51	56	58	↑ 3%
Smart meters	1	9	11	↑ 18%
Price comparison services	1	6	2	↓ 200%
TOTAL	2,987	4,799	4,210	↓ 12%

Chart 4: Number of helpline energy issues by advice code, comparing 2014-15 to 2015-16



2.1 Billing errors

53. Unexpected and/or estimated bills can cause budgeting issues for households and can lead to large bills which households may struggle to pay. The most common billing issues related to back-billing and catch up bills which accounted for 39% of all billing issues. The second most common issue arose from customers not being responsible for a bill or debt charged to their account. The number of issues related to this issue increased by 46% from 183 issues in 2014-15 to 268 issues in 2015-16. Overall however the helpline had 11% fewer issues in Scotland relating to billing in 2015-16 compared to 2014-15.

Table 5 presents the type and volume of billing error issues that consumers sought advice on in 2015-16, compared with the figures from 2014-15.

Table 5: Number and type of billing error issues

Billing Error	2013-14	2014-15	2015-16	% change between 2014-5 to 2015-6
Back-Billing/Catch-up Bill Received	266	442	682	↑ 54%
Customer Not Responsible for Bill/Debt	81	183	268	↑ 46%
Failure to Refund	96	293	236	↓ 19%
Failure to set up DD / DD at incorrect level	38	195	219	↑ 12%
New Bill Not Received/Frequency of Bills	54	270	159	↓ 41%
DD unauthorised withdrawal	17	28	46	↑ 64%
Clarity of bill	219	433	39	↓ 91%
Final bill not received	17	77	39	↓ 49%
Multiple MPRs/MPANs for one site	0	4	21	↑ 425%
Disputed use of premises : Business/Domestic	3	10	18	↑ 80%
Missing/Misdirected Payments (credit meter)	5	15	18	↑ 20%
Online tariff problem	1	16	12	↓ 25%
Incorrect opening / closing meter reading on transfer	1	10	5	↓ 50%
PPM Statements	3	4	2	↓ 50%
Security deposits	0	1	1	0%
Amount on bill does not match smart meter energy display	1	0	0	
Total	802	1,981	1,765	↓ 11%

2.1.1 Back-billing / catch-up bill received

54. The number of back-billing issues increased by 54% in 2015-16 compared to 2014-15. A back-bill or 'catch-up' bill is sent by a gas or electricity supplier when they determine that a customer hasn't been correctly charged for their energy use. Helpline evidence demonstrates the difficulties that arise from estimated bills and consequent back-billing. This is a particular issue when it occurs over an extended period and a client finds that despite paying their monthly bills as requested, they have unwittingly generated an unaffordable debt. Suppliers are only allowed to back-bill for energy used within 12 months of the billing date if they are at fault³². Beyond this period the bill must be written off. This however does not always happen.

³²www.ofgem.gov.uk/consumers/household-gas-and-electricity-guide/who-contact-if-its-difficult-paying-energy-bills/energy-back-billing-your-rights

The cases below highlight some of the issues experienced by clients affected by catch up bills, who find that their payments have been incorrect to date and that they are in debt to their supplier:

Case 1) A client called the Citizens Advice Consumer Service for advice about a large bill he had received from his supplier.

- *The client received a notification that his monthly direct debit was to be increased from £81 to £590. The client contacted the supplier and was told he owes them £4,100. The client was on the phone for 2 hours to the supplier yesterday. There was no explanation of this. The client had sent a meter reading almost two years ago but was told that it could not be used. There has been no attempt to read the meter from the supplier and they have also never asked for a reading to be given.*

Suppliers can often try to reclaim back billed debt that was accrued a long time previously.

Case 2). A client called the Citizens Advice Consumer Service for advice on a debt that had been accrued with his supplier two years previously.

- *The client had been a customer with the supplier over two years ago. After paying off a debt monthly, the client had been told by the supplier that his debt had been cleared. The client then moved to a new property and changed supplier. Two years later the client received a call from a debt collector saying he owed £1400 after charges had been added to an initial debt of £950. The client received no phone calls or letters to say this money was outstanding and was unaware of the debt. The supplier has now added this debt onto the client's prepayment meter.*

2.1.2 Responsibility for debt

55. A number of customers also contacted the Citizens Advice Consumer Service with issues regarding liability for debt where they felt that they were not responsible for the bills being sent to them.

Case 1) A client called the Citizens Advice Consumer Service for advice regarding debt on a prepayment meter that a previous tenant had accrued.

- *The client who is living in a property paid by his employer has encountered a debt of £5,000 debt on the meter. As advised by the supplier the client sent through the property sales agreement to the supplier a week ago but is waiting to hear back. The client has also emailed the supplier twice this week regarding this issue but has heard nothing back.*

Case 2) A client called the Citizens Advice Consumer Service for advice after being sent bills from a supplier that she did not have an account with.

- *The client has received two bills from different suppliers claiming that they are supplying the property. The client, who is a pensioner, received a bill for over £900 even though she does not have an account with the supplier. The client is receiving many phone calls from the supplier and is stressed by the situation.*

2.1.3 Failure to refund

56. The Citizens Advice Consumer Service was contacted by a number of clients who were having problems claiming back credit that was on their accounts. There is currently no regulatory requirement for suppliers to repay credit to a consumer within a certain time frame.

Case 1) The cases below highlight some of the issues experienced by clients who are having issues with reclaiming credit on their accounts

- *A client called the Citizens Advice Consumer Service for advice on a billing issue. The client is in credit by £633 with her supplier. They have promised to send the money to her account immediately but so far no payment has been received.*
- *A client who is registered disabled called the Citizens Advice Consumer Service for advice on how to reclaim credit on her account. The client's account is in credit by £911, which the client has been trying to claim back for 15 months. The client has raised multiple complaints in this time period but the supplier has not resolved the matter.*

2.2 Information

57. Consumers contacted the helpline with 867 requests for information in 2015-16. This is a decrease of 19% compared to 2014-15. The most common issue raised related to information on how to change supplier, which increased from 215 to 407 issues in 2015-16, an increase of 89%. This shows a continuing annual trend of increasing enquiries about how to change supplier. This is likely to relate to media attention surrounding supplier switching and indicates that information about the benefits of switching may be reaching certain consumer groups. A report by DECC³³, shows that the number of consumers switching electricity supplier in 2015 increased by 11% compared to 2014, with gas transfers increasing by 19%.

Table 6 presents the type and volume of billing error issues that consumers sought advice on in 2015-16, compared with the figures from 2014-15.

³³ DECC (2016) Quarterly Energy Prices March 2016

Table 6: Number and type of information issues

Information issues	2013-14	2014-15	2015-16	% change between 2014-5 to 2015-6
How to change supplier	65	215	407	↑ 89%
Unable to categorise (UTC)	25	148	185	↑ 25%
Non domestic contract issues	58	65	87	↑ 34%
Energy Efficiency Advice	61	33	52	↑ 58%
Supply Point Number Information	40	54	49	↓ 9%
Pricing information	511	534	37	↓ 93%
Company contact details (non complaint purposes)	0	0	31	
Maximum Resale Price	4	6	14	↑ 133%
Priority Services Register	1	5	3	↓ 40%
Smart Metering information	2	4	2	↓ 50%
Company Contact Details (non compliant purposes)	197	0	0	
Complaint About Price Comparison Provider	11	0	0	
Total	975	1,064	867	↓ 19%

2.2.1 Switching supplier

58. Clients regularly contact the helpline for advice on how to change supplier. In this case they may be signposted to an accredited price comparison website. However all tariff options may not be available to all consumers. Below a number of case studies are presented that represent issues that clients have had with regard to switching supplier.

Case 1) A client contacted the Citizens Advice Consumer Service because he felt he was being unfairly treated by his current energy supplier.

- *The client whose tariff is due to end at the end of the month is upset that customers who pay by direct debit are being offered a discount but he is not.*

Case 2) A client contacted the Citizens Advice Consumer Service looking for advice on switching supplier as he had no access to the internet. This was a common issue reported to the helpline.

- *The client is currently supplied by one of the big 6 energy suppliers and wants to find a cheaper supplier. However he has no access to the internet and so cannot use price comparison websites.*

2.2.2 Standing charges

59. The helpline was also contacted by a number of clients who were concerned about standing charges. The standing charge is a fixed daily charge that covers the cost of keeping your home connected to the energy network, carrying out meter readings, maintenance and other related charges. Every client will be charged a standing charge for both electricity and gas regardless of how much gas or electricity they use. This has occurred since Ofgem introduced their tariff simplification rules in 2013 which has seen many suppliers abolish zero standing charge tariffs³⁴. This affects low energy users disproportionately.

³⁴ www.moneysavingexpert.com/utilities/electricity-standing-charge

Case 1) A client contacted the helpline to enquire about standing charges to their property which has three meters.

- *The client had initially picked a supplier on the basis that they would not charge the client a standing charge. However with new legislation the company has now introduced standing charges. As one of the meters is attached to the supply of a shed and has low usage, the standing charge is now higher than the cost of electricity used.*

Case 2) Another client contacted the helpline after being charged a standing charge for gas even though she has never used gas within the property.

- *The client has a 20 year old gas meter in her property even though she doesn't use gas and never has. The client is now being billed a standing charge for the gas supply. The supplier requested the client remove the gas meter at a cost of £400. The client is not willing to pay this but the supplier has now issued a court warrant to enter her property and remove the meter at the client's cost.*

2.2.3 Small businesses

60. A number of small businesses also contacted the Citizens Advice Consumer Helpline. Businesses are not covered by the same consumer protection laws that apply to households. Therefore issues with energy supplier contracts can often disproportionately affect small businesses. For example there is no 14 day cooling-off period for businesses when they take out a new contract with an energy supplier. Also, due to 'deemed' contracts businesses may be subject to higher prices.

The cases below highlight these issues.

- *A business client called the Citizens Advice Consumer Service with an issue relating to energy supplier contracts. The client's small business took out a 6 month lease on a property. The client is having issues as the supplier claims that the businesses' receptionist, who shares the same surname as the owner, verbally agreed to a 5 year contract over the phone. The client debates that this agreement ever took place. The client is now extremely stressed by the situation as the lease on the property is only for 6 months. The stress of the situation has led to the client having a collapsed lung. The client tried to take out a contract with a new supplier but it was blocked.*

The case below highlights a similar issue relating to the renewal of business contracts.

- *A business client called the Citizens Advice Consumer Service with an issue relating to an automated roll over contract. The client did not respond to a new contract offer by the set date and so was rolled onto a new fixed term 1 year contract where the tariff had increased by 50%.*

2.3 Metering

61. Metering issues accounted for 16% of all issues brought to the helpline in 2014-15. In total 692 metering issues were raised with the helpline, an increase of 32% from 2014-15. Of all the metering issues, meter provision or exchange recorded the highest number of issues with 196, an increase of 32% from 2014-15. Issues brought to the helpline regarding meter provision often revolve around prepayment meters with consumers often having to wait for periods of time to have prepayment meters installed or removed. Additional metering issues that consumers reported were related to replacing old and faulty meters that had in some cases led to incorrect bills.

The third most common issue raised was meter reading/data collection with 159 issues raised. Issues relating to this advice code included problems experienced by vulnerable consumers who couldn't access their electricity and gas meters.

Table 7 presents the type and volume of metering issues that consumers sought advice on in 2015-16, compared with the figures from 2014-15.

Table 7: Number and type of metering issues

Metering issues	2013-14	2014-15	2015-16	% change between 2014-5 to 2015-6
Meter provision or exchange	84	148	196	↑32%
Meter Accuracy	76	134	169	↑26%
Meter Reading/Data Collection	56	149	159	↑ 7%
Supply Point Administration Query (MPRN/MPR)	30	130	112	↓14%
Suspected Meter Tampering	12	28	39	↑39%
Meter Positioning	18	21	17	↓19%
Total	276	610	692	↑13%

2.3.1 Meter provision or exchange

62. Clients contacted the helpline with a number of issues relating to the supply or exchange of meters. A number of clients had issues with suppliers not showing up at the property when they were scheduled to. In a number of cases the delay in replacing a meter can lead to the accrual of debt.

Case 1) A client contacted the Citizens Advice Consumer Service after waiting for months for a supplier to change the gas meter and open up the gas supply to the property.

- *The client lives with his family in a flat with central heating but currently has no gas supply. The client phoned and emailed the supplier several times requesting that a new meter was fitted and the gas supply opened. However the supplier didn't show up on several occasions. The client is upset as the flat has been extremely cold over the winter without central heating and he feels that this has been affecting his family's health. He also feels he is due compensation for the cost of improvised heating arrangements and for the time he has had to take off work.*

Case 2) Another client called the Citizens Advice Consumer Service with a similar issue relating to a supplier not showing up for scheduled appointments.

- *The client has contacted his supplier many times requesting for a prepayment meter to be fitted to his property. The supplier has missed 5 appointments to fit the new meter.*

2.3.2 Metering accuracy

63. The Citizens Advice Consumer Service was contacted by a number of clients who believed that their meters were not providing accurate recordings of the energy used. In many cases this led to consumers being faced with unmanageable bills.

Case 1) A client contacted the Citizens Advice Consumer Service on behalf of her elderly mother with an issue regarding meter accuracy.

- *The client moved out of the property and gave the supplier meter readings. The client was told by the supplier that she was in credit by £1,293. The client was then charged £1,350 directly from her bank account meaning her total spend was over £2500 over a 6 month period. The client believes that her meter may have been faulty.*

Case 2) A client contacted the Citizens Advice Consumer Service with an issue relating to the accuracy of the meter installed in his property.

- *The client is currently paying up to £2,000 a year for his electricity. He has spoken to his supplier who said they are looking into it but state that it will take up to 3 months for them to check it. The client believes that other people in his street are having the same problem and he believes that this might be down to all the meters in the street being fitted incorrectly. None of the households in the street are having any success with querying the bills and many are struggling to make the payments.*

2.3.3 Meter reading and data collection

64. The Citizens Advice Consumer Service was contacted by a number of clients who had issues relating to meter readings. In some cases this related to clients' ability to take meter readings in their own properties due to health issues or disabilities. The helpline was also contacted by clients who had issues relating to meter readings taken by suppliers.

Case 1) A client contacted the Citizens Advice Consumer Service with an issue about incorrect meter readings that had occurred over a number of years and has led to the client being overbilled.

- *The client's electricity meter has been read incorrectly for the last few years. The meter reader has been including the red digits at the end. This includes any meter readings given by the client. This means that the client has been charged far more than she should have been. The 2 red digits are very clearly marked on the meter. The extremely high meter readings were not picked up on by the supplier.*

Case 2) Both of the below cases highlight how elderly and disabled consumers can have issues with reading conventional meters.

- *A client contacted the helpline as she is very disabled and cannot make it to the door in time when the meter readers come to her property.*
- *A client contacted the Citizens Advice Consumer Service on behalf of her elderly grandmother. The client's grandmother has problems reading the meter due to health conditions. The client asked the supplier if her grandmother could be placed on the Priority Services Register (PSR) but was told that they didn't have a PSR.*

2.4 Debt and disconnections

65. Issues with debt/disconnection account for 8% of all helpline cases. The helpline dealt with 231 debt/disconnection cases in 2015-16 a decrease of 26% compared to 2014-15. Debt and disconnection issues that consumers raised ranged from unaffordable debt repayment, debt recovery practices and cases of self-disconnection and forced disconnection. The most common debt/disconnection issue related to the self-disconnection of prepayment meters of which 56 issues were raised. Issues related to debt recovery practices were the second most common issue raised with 45 cases in 2015-16. This is a drop of 48% compared to 2014-15.

Vulnerable consumers who contact the helpline with complex cases referring to disconnection or threatened disconnection and/or significant debt are referred to the Extra Help Unit for further, in-depth support.

Table 8 presents the type and volume of debt and disconnection issues that consumers sought advice on in 2015-16, compared with the figures from 2014-15.

Table 8: Number and type of debt/disconnection issues

Debt/Disconnections issues	2013-14	2014-15	2015-16	% change between 2014-5 to 2015-6
PPM self-disconnection (unable to credit meter)	20	73	56	↓23%
Debt recovery practices	66	86	45	↓48%
Unsuitable or Unaffordable Payment Scheme to Cover Debt	34	63	41	↓35%
Disconnection Following due Process	36	36	29	↓19%
Vulnerable Consumer disconnected	14	20	24	↑20%
Disconnection/Forced PPM in Error	5	9	17	↑89%
Disconnection/Forced PPM Without Proper Process	11	15	14	↓7%
Disputed Rights of Entry	1	4	3	↓25%
Unable to Request Suitable Payment Methods (Fuel Direct, PPM)	7	8	3	↓63%
Total	194	313	231	↓26%

2.4.1 Prepayment self-disconnection

66. Households who rely on prepayment meters can be disconnected if they are unable to top-up their meter for a number of reasons. Prepayment meters use meter keys which if lost or faulty can lead to consumers being unable to top-up their meters. If these issues are not resolved quickly it can lead to their supply being disconnected.

Case 1) A client contacted the Citizens Advice Consumer Service as they are out of work and cannot afford to clear the £9 of debt and top up their prepayment meter. The client is on employment and support allowance and has a number of medical issues.

- *The client has had no gas supply for around 2 weeks and cannot afford to top it up. The client stated that he would be able to top up the meter in around 3 weeks' time. The client has £6 left for electricity on his prepayment meter. The client who has had to stop work is also in arrears with the council for rent.*

Case 2) A client contacted the Citizens Advice Consumer Service with worries about their electricity and gas supply being disconnected.

- *The client is having money issues as they are currently making a claim for benefits. They think that the credit on the meter will run out within a few days and they have no way of topping it up. The client also has health issues.*

Case 3) A client contacted the Citizens Advice Consumer Service after a technical fault with his prepayment meter had led to disconnection.

- *The client went for 5 weeks without electricity after the supplier failed to fix a fault with his meter. The client made several complaints to the supplier in the 5 week period. The supplier has stated that they are not willing to compensate.*

2.4.2 Debt recovery process

67. Debt recovery can be a highly stressful process for households, particularly if not managed to suit their individual budgets. Clients may be asked to repay a debt at an unaffordable rate, and the level of repayment may be set without consultation. Consumers contacting the helpline with debt or disconnection issues may not be clear about what to expect from their supplier or of their consumer rights. Clients may also be unaware that suppliers should direct them to an Energy Trust who can often assist those in fuel poverty with debt recovery.

A number of key issues resulting from suppliers' debt recovery practices are highlighted in the cases below.

Case 1) A client contacted the Citizens Advice Consumer Service as he was struggling to repay a debt that had accrued on his energy account.

- *The client has been in the property for 2.5 years. The client was told he owed £850 to the supplier. The supplier declined to take payments towards the debt directly from the clients benefit. The client's benefits have now been stopped and the client has no income. The supplier is trying to charge the client £80 per month but the client can only afford £15. The supplier has warned the client that he is at risk of being disconnected.*

Case 2) A client contacted the Citizens Advice Consumer Service after her supplier raised a court case to enter her home and fit prepayment meters to reclaim debt.

- *The client has accrued a debt of £1,500 with her supplier. The supplier wants to fit prepayment meters in the client's home but the client does not want this. The client requested that a repayment plan was set up but the supplier refused. The client contacted the supplier to say that she wanted to repay the debt but also that she wanted to change supplier. The supplier blocked her transfer because of the debt. The supplier now has a court date to gain a warrant to enter her home to fit prepayment meters.*

Case 3) A client contacted the Citizens Advice Consumer Service after her supplier passed on a debt to a debt collection service who subsequently added more charges.

- *The client's husband left and he had been responsible for the energy bills. The client assumed he was still paying the bills as they were in his name. The client then received a bill for £1,700 in her name dating from the period her husband had left. Over a period of time the client paid back £1,500. The client then received a letter from a debt collector saying that she owed £350. The client did not realise that money would be added onto her debt if it was sent to debt collectors. The client also didn't agree on any repayment plan with the supplier.*

2.4.3 Unsuitable or unaffordable payment scheme to cover debt

68. In many cases the Citizens Advice Consumer Service was contacted by clients who were unable to afford the proposed repayment scheme offered by the supplier to repay a debt. It is not clear that suppliers always consider the affordability of a repayment plan for consumers. This can lead to significant stress for clients who are trying to manage budgets on a tight income.

Case 1) A client contacted the Citizens Advice Consumer Service after her direct debit was increased significantly as she had been underpaying for a period.

- *The client is in arrears of over £400 because she had been underpaying for usage. The supplier has increased her direct debit from £35 to £79 per month which the client cannot afford.*

Case 2) The Citizens Advice Consumer Service was contacted by a client who missed one payment on their repayment plan and was told that a prepayment meter would need to be installed.

- *The client who is registered blind and has mental health issues missed a payment in her repayment plan and has been told by her supplier that a prepayment meter will need to be installed. The client who has six children, two of which have health conditions believes that she should not have a prepayment meter installed due to her circumstances.*

2.5 Transfers

69. Issues related to transfers accounted for 5% off all helpline cases with 223 issues raised in 2015-16. This is an increase of 2% from 2014-15. Although the number of transfer issues handled by the helpline is relatively small, they can concern serious issues. The most common transfer issue related to problems arising from contracts. Problems arising from contracts had 88 issues raised in 2015-16, an increase of 60% from 2014-15. The number of issues related to erroneous transfers, the previous most common category, decreased in 2015-16 compared to 2014-15 with only 49 issues raised.

Table 9 presents the type and volume of transfer issues that clients sought advice on in 2015-16 compared with figures from the previous year.

Table 9: Number and type of transfer issues

Transfer issues	2013-14	2014-15	2015-16	% change between 2014-5 to 2015-6
Problems Arising from Contracts	43	55	88	↑ 60%
Breach of Erroneous Transfer Charter	44	63	49	↓ 22%
Failure to Correctly Apply for Transfer	5	14	22	↑ 57%
Supplier Objection - Reasons Unknown	15	15	17	↑ 13%
Supplier unable to Supply	5	8	16	↑ 100%
Cancelled contract not actioned	7	10	9	↓ 10%
Supplier Objection to Transfer on Grounds of Debt	5	4	9	↑ 125%
Transfer windows	12	33	7	↓ 79%
Supplier Objection to Transfer on Grounds of Contract Terms (deemed contacts)	3	7	3	↓ 57%
Transfer in error due to incorrect supply point information	1	9	3	↓ 67%
Transfer Not Actioned After Price Notification Received	1	0	0	
Total	141	218	223	↑ 2%

70. As defined by their licence conditions, energy suppliers have to adhere to a number of contractual rules. These rules such as a 14 day cooling off period for domestic consumers and the inability to charge an exit fee in the last 42-49 days of a fixed term contract, may not be followed when suppliers have technical or administrative issues. The following case studies highlight some of the issues that consumers face in relation to transfers.

2.5.1 Problems arising from contracts

71. In 2015-16 the Citizens Advice Consumer Service assisted clients with 88 issues related to problems arising from contracts. This category covers a wide variety of issues ranging from difficulties in switching supplier, to the transfer of an account from one individual to another. The 60% increase in problems arising from contracts in 2015-16 compared to 2014-15 may be due to the increase in switching rate seen across the energy market. Below two case studies are presented that highlight some of the issues faced by consumers in relation to energy contracts.

Case 1) The Citizens Advice Consumer Service was contacted by a client who was having issues trying to change his energy supplier.

- *The client is on an E10 meter but does not use the storage heaters that the tariff is designed to accommodate. His supplier will not change the meter. The client has tried to switch supplier but he is having difficulty. The client feels trapped.*

Case 2) The Citizens Advice Consumer Service was contacted by a client who was having issues with changing the name on her account.

- *The client's husband passed away and the client decided to leave the supplier. The client asked for her final bill and gave her final meter readings. The supplier said they cannot speak to the client but only to her husband. The client has repeatedly told the supplier that her husband has passed away. The client finds this distressing. The client received a final bill for over £1,000 with no reference to any of the meter readings.*

2.5.2 Erroneous transfers

72. In a number of cases clients were wrongly transferred to a new supplier. Because there are two suppliers involved, these issues can be long and complicated to resolve and can often lead to the accrual of debt without the client's knowledge.

Case 1) The Citizens Advice Consumer Service was contacted by a client who had been wrongly transferred to a different supplier after enquiring about prices.

- *The client who was originally supplied by one supplier, requested information on prices from a second supplier. The client states that a contract was never formed. The client then received a bill from the second supplier. The new supplier cannot provide any proof of the new contract.*

Case 2) The Citizens Advice Consumer Service was contacted by a client who had been wrongly transferred to a different supplier.

- *The client who has spinal damage and has suffered two strokes in the last month was erroneously transferred from one supplier (supplier 1) to another (supplier 2) two years ago. On request the electricity was switched back to supplier 1 but not the gas. The client has been supplied by supplier 2 but has been paying supplier 1. Supplier 1 will not take back his supply for gas because he is now in debt with supplier 2.*

2.5.3 Failure to correctly apply for transfer

73. In a number of cases clients were unable to switch supplier due to administrative or supplier system errors. As is highlighted in one of the cases below this can lead to the unexpected accrual of debt.

Case 1) The Citizens Advice Consumer Service was contacted by a client who was having issues when trying to change supplier.

- *The client was trying to switch suppliers from one supplier to another but the transfer was blocked. At first the new supplier stated that the client was in debt, however the client was in credit. The client was then told that there was an issue with the supply number. The new supplier contacted the National Database and the client is still blocked.*

Case 2) The Citizens Advice Consumer Service was contacted by a client who was having issues after moving into a new property.

- *The client moved into a new property and did not know who the supplier was. The client tried to open an account with a new supplier. The new supplier was slow to take over the supply so the client was still being supplied by the previous supplier. The original supplier sent the client a bill for £600 based on estimated meter readings as the client had not sent them any meter readings. The new supplier has said that they will not provide any compensation over the late takeover.*

3. The Extra Help Unit

74. The Extra Help Unit (EHU) is a GB-wide service delivered by CAS to both domestic and non-domestic GB energy and post consumers. The EHU actively seeks to identify and address policies and practices affecting vulnerable consumers and works closely with the policy units within the Citizens Advice service, suppliers and industry regulators to make improvements.

75. The majority of consumers are referred to the EHU via the Citizens Advice Consumer Service and, increasingly, by bureaux advisers. Referrals are also received from the Energy Ombudsman, Ofgem, advice agencies and elected representatives. Consumers transferred to the EHU can be very distressed, living on very low incomes and in desperate need of representation. Many clients suffer from health problems and often there are young children or elderly people living in the home. The EHU regards consumers as vulnerable when they are unable to resolve a complaint for themselves due to:

- Their personal circumstances
- The urgency of the situation
- The complexity of the case

The EHU also has a duty to investigate cases where any consumer:

- Has been disconnected
- Is threatened with disconnection
- Has experienced a failure in a prepayment meter system

76. The EHU acts as an advocate for consumers and represents their needs and aims to secure an outcome that's right for that individual. As such EHU case studies usually contain significant detail. To illustrate the type of issues consumers come to the EHU with, this section presents a small number of case studies for each of the top 5 advice codes. Each case study is presented in two parts; the first paragraph outlines the consumer issue in detail whilst the second identifies the support and any outcomes secured by the EHU for that particular household.

77. In addition to case handling energy complaints, the EHU also provide advice via the 'Ask the Adviser' service. This service supports other advice providers to obtain the information they need to resolve their client's complaint. Stakeholder Liaison Officers are able to provide advisers with guidance on complex energy questions.

Issues advised on by the EHU in 2015-16

78. In 2015-16 the EHU provided advice and investigated complaints to clients in Scotland on a total of 1,163 issues, which is a 1% increase on the number in 2014-15. All figures presented below refer to clients advised by the EHU in Scotland, as opposed to GB. Across GB, in 2015-16, the EHU dealt with 8,397 complaints, 1,230 enquiries and 1,165 'Ask the Adviser' contacts. The case studies however are taken from GB wide cases, but represent GB wide issues that would not be restricted to England and Wales or Scotland.

79. Table 10 below shows the breakdown of the number of EHU issues advised upon by advice code. It shows how the number of issues in 2015-16 compares to the previous year. As can be seen in table 10 the most common issues raised were, billing errors, metering issues, debt/disconnection issues and transfer issues. While the number of issues for the top three categories stayed broadly similar from 2014-15 to 2015-16, the number of transfer issues increased by 54% from 78 to 120.

Table 10: Number of EHU energy issues by advice code (raised by clients in Scotland).

EHU advice code	2014-15	2015-16	% change
Billing errors	430	424	↓ 1%
Metering	246	250	↑ 2%
Debt/Disconnections	222	225	↑ 1%
Transfers	78	120	↑ 54%
Prepayment meters	96	61	↓ 36%
Information	44	36	↓ 18%
New Policy Matter	2	27	↑ 1,250%
Distribution/Transportation	15	11	↓ 27%
Marketing	10	6	↓ 40%
Customer Service failure	7	3	↓ 57%
Smart meters	0	0	
Price Comparison Services	n/a	0	
TOTAL	1,150	1,163	↑ 1%

80. Chart 5 below illustrates how similar both the number and prevalence of issues was between 2014-15 and 2015-16. Chart 6 displays the proportion of different issues raised in 2015-16 against the total number of issues raised by Scottish clients at the EHU.

Chart 5: Number of EHU issues by advice code in 2015-16 compared to 2014-15

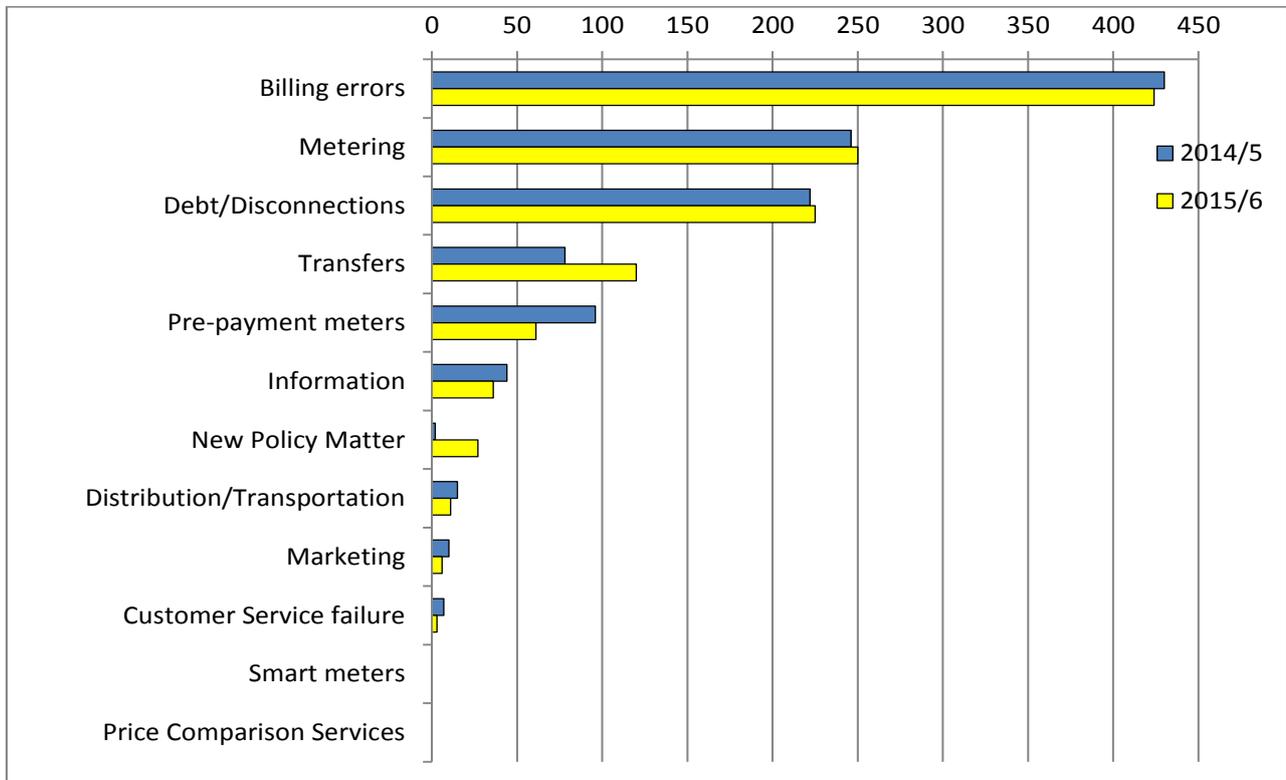
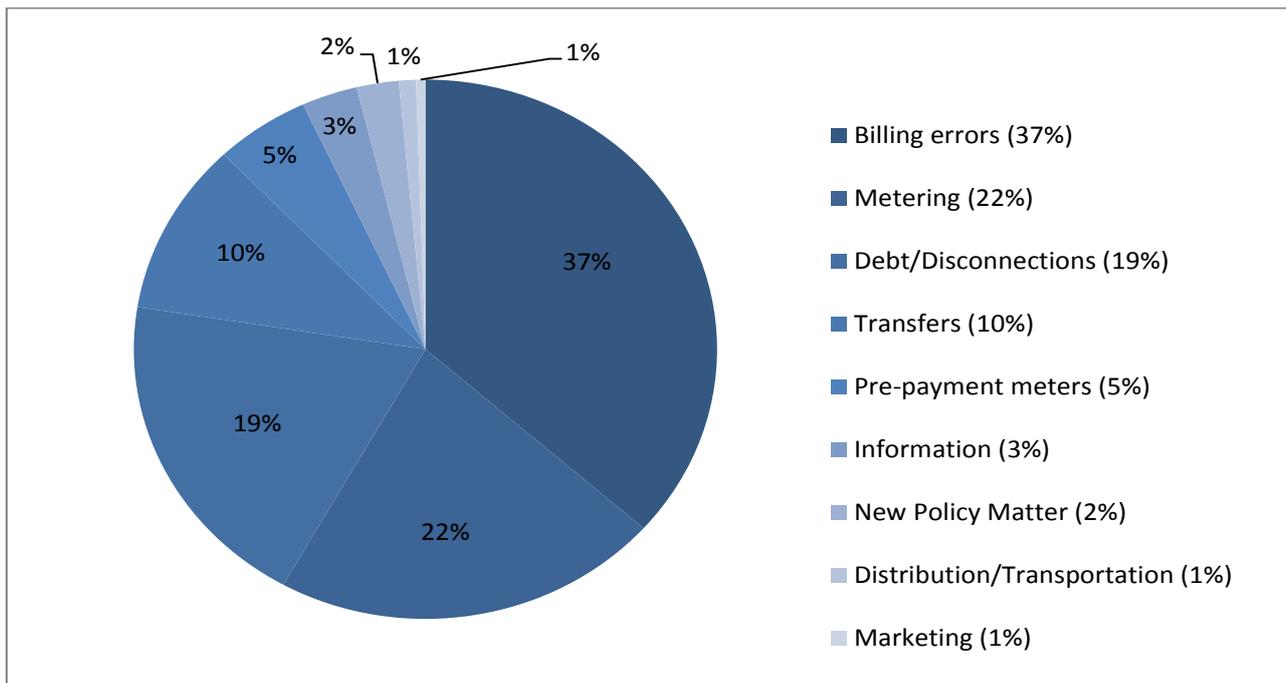


Chart 6: Advice code as a proportion of the total energy issues brought to the EHU by clients in Scotland



3.1 Billing errors

81. As in 2014-15, billing issues dominated the complaints received by the EHU in 2015-16 making up 37% of all issues dealt with 424 issues – more than double that of the second top issue. This was largely due to the legacy issues with some suppliers migrating customers to a new customer billing system. The number of billing issues peaked in 2015, with a slight drop in the last quarter of 2015-16. A number of suppliers have also had issues with a new customer billing system which has led to some customer complaints.

82. There has been an increase in the number of consumers experiencing billing issues after having switched to a small energy supplier (often new entrants to the market). For example, some suppliers only bill customers once every 6 months which makes bills unaffordable for some customers or means inaccurate bills have mounted up in that time.

83. The case study presented below gives detail of a client who received a large backbill after her supplier wrongly reduced her direct debit. After been told of the debt she had accrued the supplier insisted on a re-payment plan that was not affordable for the client.

Billing Case Study 1

- *The consumer contacted the Extra Help Unit having received a large backbill from her supplier. The supplier had previously reduced the direct debit from £50 per month to £10 per month after a meter reading was provided by the consumer. A year later the supplier tried to collect £650 from her bank account using the direct debit without any prior notice. She queried this and was told the balance was £4,500.*

The supplier appeared to acknowledge their initial error with lowering the direct debit and had already offered a goodwill gesture of £40.

Although the consumer was in work she was in receipt of tax credits suggesting she was on a low income. She offered a payment plan of £200 per month (including £90 for usage and £110 for the debt) however, the supplier insisted on repayment of the debt within 12 months or a prepayment meter. This was not manageable for the consumer.

The Extra Help Unit raised a complaint and the initial response was still repayment of the debt within 12 months or a prepayment meter, with a debt recovery rate of £25 per week. The supplier had not taken into account the consumer's ability to pay.

The position was challenged by the Extra Help Unit and an extended payment plan requested over 3 years which was more manageable for the consumer. This was then accepted by the supplier. Concerns remained about the balance and the supplier's failure to accurately re-assess the direct debit. The Extra Help Unit had asked for a review in line with the industry Code of Practice on Accurate Bills however, the supplier disagreed this should apply. They instead offered an increased goodwill gesture of £150.

The matter was then escalated at a senior level and challenged further by the Extra Help Unit. The supplier agreed there was more that could have been done and applied a reduction to the balance equal to that which would have applied under Code of Practice on Accurate Bills. The balance was reduced from £3,923.69 to £1,545.76, a total reduction of £2,377.93.

3.2 Metering

84. The EHU handled 250 cases involving metering issues in 2015-16. These accounted for 22% of all issues advised upon by the EHU in Scotland. As in 2014-15 metering was the second most common issue reported. Issues recorded in the metering category commonly relate to problems with prepayment meters, including faulty meters. Metering issues can also identify consumers who have self-disconnected from their supply due to a low income.

85. Customers experienced difficulties in getting a new meter installed by suppliers, or getting an emergency appointment (when a meter has gone blank). In many cases this has caused customer concern about their supply being cut-off as appointments may only be available several weeks later. Whilst the fuel supply should not be cut-off in most cases, in some cases it can be.

86. The case study below shows the case of a client who had issues accessing her meter as it was located at height in a communal hallway. After requesting to have the meter changed to a credit meter the client was told that the exchange could not happen due to a fault with a new billing system.

Metering case study

- *The consumer moved into a flat and found the prepayment meter was located in the communal hallway in a cupboard and was positioned near the ceiling. The consumer needed to climb a ladder to access the meter and add credit which was not practicable.*

When she started using the meter it seemed defective as it appeared to be taking money from any credits put in. She reported this to the supplier at the time and an engineer came out but it was unclear what action he took.

The consumer then developed a sudden onset condition affecting her knee; she had her leg in a brace and was unable to walk unaided. She therefore requested that the meter be exchanged for a credit meter as she was physically unable to top up the meter. It appears the supplier attended but was unable to complete the required work, although it was unclear why.

The meter operator then attended and it was found the meter serial number did not match the one on their records and they were unable to exchange the meter.

The consumer had been left without electricity for extended periods because she was unable to access the meter and was relying on a neighbour to top up the meter which was not always possible. She made a complaint online to the supplier but they said this was not received and she has no record because it was using an online form.

The Extra Help Unit raised the complaint and it was discovered that when the supplier had fitted the prepayment meter they had been unable to update the meter exchange details due to technical problems with a new billing system that had been introduced. This was preventing the meter exchange going ahead.

The Extra Help Unit liaised with the supplier and consumer to arrange a manually booked meter exchange appointment. The caseworker also negotiated for credit to be added to the prepayment meter in the meantime to ensure the consumer did not go off supply. A total goodwill gesture of £80 was agreed overall and the meter was successfully exchanged.

3.3 Debt and disconnections

87. As in 2014-15, fuel bill debt and disconnections constituted the third largest issue seen by the EHU, making up 19% (222) of all Scottish energy issues advised upon. In 2015-16 the reason for self-disconnection was often cited as a result of issues such as standing charges, sanctions or changes to social security payments.

88. In 2015-16 a continued high number of cases of customers falling into fuel bill arrears due to sanctions on their benefits were seen. The effect of sanctions is to freeze benefits for up to 8 weeks during which time customers often have no financial means to pay for fuel or even buy food. This situation might occur when a person claiming Job Seekers Allowance misses an appointment at a job centre, which can occur for a variety of reasons.

89. Self-disconnections continued to be a significant cause of issues by EHU clients in Scotland. Self-disconnections were often seen when there is a delay in benefit claimants receiving universal credit whilst their claim is reviewed. Recent research published by Citizens Advice and Citizens Advice Scotland showed that 19% of consumers who had contacted the EHU with self-disconnection issues, cited issues with their benefits as the main cause of being unable to top up their meters³⁵.

90. Anecdotally the EHU reported a notable number of cases with non-domestic consumers whose supply was disconnected because of non-payment of bills.

Below a case study is presented that highlights some of the issues clients can have with debt and the subsequent threat of disconnection.

Debt and disconnection case study

- *The domestic consumer had a debt balance for electricity and gas of £295.64 due to missing payments for monthly bills over three consecutive months. This balance was referred to a debt collection agency resulting in a pre-disconnection visit and a letter of intent being left. A Rights of Entry letter was then issued and warrant of entry applied for.*

The warrant was granted, by which time the energy debt alone was £434.94. The total legal charges that had been applied by this time were £720, leaving a total balance of £1154.94. The consumer paid this balance in full to prevent the warrant being carried out however, the fees of £720 were still charged.

³⁵[Citizens Advice and Citizens Advice Scotland \(2016\) Staying Connected
https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20Consultation%20responses/
Staying%20Connected.pdf](https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20Consultation%20responses/Staying%20Connected.pdf)

The EHU caseworker challenged these fees, particularly given two sets of warrant fees were applied. This seemed excessive considering it is likely only one warrant would be required to force entry to the property to access both gas and electricity meters.

The supplier maintained they informed the consumer of the applicable legal charges in their Rights of Entry letter, should they need to apply for and execute a dual warrant of entry.

The matter was then escalated by a Senior Caseworker within the Extra Help Unit to a manager at the supplier, requesting that the warrant fees were withdrawn given the circumstances and the fact the fees caused the balance to increase by 165%. This was initially rejected by the supplier, however the Senior Caseworker challenged this again and requested that the fees relating to 'execution of warrant' were removed given that the warrant had not in fact been executed.

A breakdown of what this fee covered was requested along with evidence that a supplier policy requiring payment 72 hours prior to the execution date had actually been communicated to the consumer. A comment was also requested from the supplier with respect to how the policy sat alongside Ofgem's Standards of Conduct.

The supplier did then agree to credit £480 to the consumer to account for the 'execution of warrant' costs.

3.4 Transfers

91. The EHU dealt with 120 transfer issues in 2015-16 which is an increase of 56% from last year. It constitutes 10% of all issues in Scotland advised upon by the EHU. The type of transfer issues that the EHU handled in 2015-16 included problems consumers' experienced when attempting to switch to a new supplier. In this instance some consumers found that their application was being blocked or that the incorrect supply had been taken over. Further issues arose from erroneous transfers, which could leave consumers in significant debt, or without power.

92. Back-billing relating to supplier transfers was still an issue even into the end of 2015-16. This might occur in situations where a customer switches supplier but the meter transfer hasn't been actioned effectively; the customer continues to be billed by the old supplier, as well as by the new supplier. Another cause is when there are problems setting up a payment plan. A customer has set up a direct debit plan but no payment is taken which causes debt to accrue.

93. The case study below portrays the case of a client whose partner had died. After the death of her partner the client had difficulty in both changing the name on her energy account and switching supplier after her transfer request was blocked.

Transfer case study

- *The consumer was experiencing problems with her energy supplier, one of the small independent suppliers. She was vulnerable as her partner had died very suddenly two months previously. She had explained the circumstances to her supplier and provided the required documentation to have the account transferred into her name. She was contacted 10 days later to check whether the direct debit details would be the same and she responded providing new direct debit details. No response was received so she resent the information 6 days later.*

The next correspondence she received was a letter still in her late partner's name advising payment was overdue however, with no balance specified. At this point she decided she wanted to switch and was assured by the supplier this would be fine and that any balance would be added onto the final bill. To her dismay the transfer was objected to and no reason given.

She had made repeat attempts to resolve matters and felt the supplier had caused unnecessary stress in her time of grief.

It appeared the supplier automatically objected to any transfer requests unless their customers told them of their intention to transfer. There was also only a window of 24 hours within which the supplier could lift the objection.

After EHU intervention the transfer was completed and a goodwill gesture of £50 was provided to the consumer. The supplier's response focused on resolving the failed transfer - the consumer felt the wider customer service issues and distress caused had not been acknowledged by the supplier and was concerned that the processes were still in place and could affect other customers.

The EHU had a meeting with the supplier concerned and this was one of a number of cases raised and the EHU continues to monitor the supplier's performance.

3.5 Prepayment meters

94. The EHU supported consumers with 61 cases related specifically to prepayment meters in 2015-16 – a drop of 36% from the previous year. Prepayment meter issues account for 5% of all energy related issues dealt with by the EHU in 2015-16 in Scotland. However it is worth noting that this is not the volume of cases where prepayment users have gone to the EHU for help as many will be categorised as billing or debt/disconnection issues.

95. The type of prepayment meter issues that the EHU handled in 2015-16 included meter faults. Faulty meters can lead to a consumer going off supply or being at risk of going off supply. The Extra Help Unit is also frequently contacted by consumers who have self-disconnected due to having little or no income, or for other issues such as the debt recovery setting on their prepayment meter being set at a rate which is not realistic or appropriate. This can affect consumers who have moved into properties with prepayment meters already fitted, requested prepayment meters to help them budget or have had prepayment meters force fitted to recover debt.

The case study below details the case of a client who was about to run out of credit on his gas and electricity prepayment meter and had no means to top up.

Prepayment meter case study

- *The consumer was referred to the Extra Help Unit as the credit on his gas and electricity prepayment meter was due to run out and he had no funds to top up.*

He lived alone and was unemployed, receiving Universal Credit on a monthly basis. He was struggling to manage this limited income and the next payment was not due for a further 3 weeks. He had accrued rent arrears which were now being deducted from his benefit leaving him in further financial hardship.

His local council had been unable to provide financial assistance as he had already received two crisis loans in the previous two months. He had been given a voucher for a food parcel.

A caseworker from the EHU contacted his energy supplier and negotiated credit for both meters to prevent him going without gas and electricity.

Conclusion

96. Overall the Citizens Advice Service in Scotland recorded over 28,000 energy issues across the Citizens Advice Bureaux, the Citizens Advice Consumer Service and the Extra Help Unit. With only a 2% increase in the number of cases compared with 2014-15, there has not been a significant increase in the number of issues reported in 2015-16.

97. From the body of evidence presented in this report, the CFU highlights key areas where energy markets are still failing to meet the needs of consumers. Although there are a number of emerging issues, many of the trends highlighted in this report are enduring and were highlighted in previous Advice in Detail reports^{36,37}. Once again problems with some energy suppliers failing to deliver acceptable levels of customer service (mainly related to billing and metering issues) has been the predominant cause of consumer detriment in 2015-16.

98. However, the high number of cases recorded across the service can also often be attributed and exacerbated by issues associated with household incomes more generally. Our case studies illustrate how the nature of a person's interaction with the social security system can impact on their ability to pay for energy. For those who are facing delays or sanctions to their benefit payments, they can struggle to pay bills and in some cases face disconnection as a result of debt.

99. Evidence from across each of the three services also highlights that particular groups of consumers are affected disproportionately by failings in energy suppliers' customer service. For consumers on fixed or limited incomes it is extremely difficult to budget for fluctuations in their outgoings. If these consumers are faced with unexpected bills or increases in direct debit payments it can be unmanageable and places them under significant stress. Vulnerable consumers on tight budgets are also disproportionately affected by the costs associated with contacting their supplier, having limited digital access, and by the premium cost of energy if a prepayment meter is fitted to recover debt.

100. Taken together, the data across the three Citizens Advice Services in Scotland provide a clear indication of the main areas in which the practices of energy companies can have a detrimental affect on consumers.

³⁶ Citizens Advice Scotland (2015) Advice in Detail 2013/14

³⁷ Citizens Advice Scotland (2015) Advice in Detail 2014/15

Glossary

The top level categories relating to energy issues in Citizens Advice Bureaux are;

- **Fuel debt** refers to issues around debt including when clients have trouble paying off energy debts or when they dispute liability for a debt.
- **Fuel – regulated** refers to the most common energy sources such as mains gas and electricity, regulated by Ofgem. Billing and charges are some of the most common issues in this category.
- **Fuel – non-regulated** generally refers to off-grid energy sources such as heating oil, bottled gas and coal which are not regulated in the same way as mains gas and electricity. The issues brought to bureaux in this category mostly concern billing, additional charges and methods of payment.

The top level helpline and EHU categories are;

- **Billing Error** – this category refers to issues with consumers' energy bills. The most common "billing error" issues raised with the helpline concern the clarity of an energy bill or with consumers receiving a 'back-bill' or 'catch-up' bill requesting funds they may not have realised they owed.
- **Customer Service Failure** – this category refers to issues with the customer service provided by energy suppliers. Common "customer service failure" issues relate to consumer complaints not being registered or the length of time consumers are required to wait in a phone queue.
- **Debt and Disconnections** – this category refers to any issues a consumer may have with energy debt and imposed or self-disconnection. The most common issues in this category relate to debt recovery practices, disconnection and unaffordable payment schemes.
- **Distribution/Transportation** – this category refers to issues with connections, supply and supply safety. The most common "distribution/transportation" issues concern connections and alterations of supply.
- **Information** – this category refers to any issues consumers may have in gaining access to information about their energy supply/supplier. The most common "information" issues raised concerned pricing information, company contact details and energy efficiency advice.
- **Marketing** – this category refers to any issues consumers may have with an energy company's marketing, their staff or issues with fraud. The most common "marketing" issue is misrepresentation, with consumers perceiving that they have been given false or misleading information.
- **Metering** – this category refers to any issues consumers may have with their energy meters. The most common "metering" issues refer to provision or exchange of a meter, meter accuracy and meter reading.

- **Pre-payment Meters** – “pre-payment meter” issues most commonly relate to incorrect tariffs and incorrect debt repayment rates, or with issues in changing to or from the prepayment meter method.
- **Price Comparison Services** – this category refers to any issues that consumers may have with price comparison providers.
- **Smart Meters** – this category refers to any issues that consumers may have with smart meter installation.
- **Transfers** – this category refers to any issues consumers may have with transferring from one energy supplier to another. The most common “transfer” issues refer to contracts, supplier objections (for unknown reasons) and issues with transfer times or transfers not being completed.

The Consumer Futures Unit puts consumers at the heart of policy and regulation in the energy, post and water sectors in Scotland. Part of Citizens Advice Scotland, we research and gather evidence, which we use to improve outcomes for consumers.

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Produced by The Scottish Association of Citizens Advice Bureaux
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