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Dear Tom,

## **RECCo response to Citizens Advice – Draft Consumer Work Plan 2022/23**

We welcome the opportunity to respond to the above consultation. This response represents the views of the Retail Energy Code Company (RECCo).

### **About RECCo**

RECCo was formed as the corporate vehicle for ensuring the proper, effective, and efficient implementation and ongoing management of Retail Energy Code (REC) and to promote innovation, competition, and positive customer outcomes. RECCo was developed with a clear consumer focus and this is one of our core values. Additionally, the development of the REC was intended to directly address the adverse effects on competition arising from the industry code arrangements, as identified by Ofgem and the Competition Markets Authority. We therefore have a particular interest in this consultation and RECCo is providing this response in line with its mission statement and strategic aims.

### **RECCo response**

RECCo are pleased to note the number of initiatives across Citizen Advice's (CA) four work themes that focus on supporting consumers through the current energy crisis as well as seeking to ensuring robust provisions for all future consumers. We set out below some thoughts in how RECCo is aligned with the workstreams within the CA work plan and where we may find synergies and opportunities to collaborate in meeting some of those ambitions.

#### Priority Services Register (PSR)

As part of RECCo's forward work plan, we set out our ambition to improve the sharing of data for a better PSR service for priority and vulnerable consumers. We would like the energy industry and wider utilities as a whole to adopt, and effectively deliver something similar to, the 'tell me once' principle. As the REC provides a common legally binding instrument for all relevant parties in the energy industry, we consider that it offers a great opportunity to achieve greater consistency of access to the register and subsequent sharing of data amongst those relevant parties. We would welcome working with the CA on the development of the PSR to ensure that consumer concerns and issues are appropriately captured.

## Making markets work for consumers

Future energy retail markets must cater for all consumers if we are to meet the governments' net-zero ambitions, ensuring vulnerable consumers, low income households and those that are digitally excluded are not left behind. Decarbonising homes must be combined with more energy efficient properties which will require a significant retrofit of the GB housing stock. RECCo operate the Green Deal Central Charge Database and propose to review the governance and infrastructure of the Green Deal scheme. We wish to identify opportunities to improve cost-efficiencies and/or to re-purpose the scheme to deliver better value to REC parties and possibly make a greater contribution to emissions reductions. We believe this aligns with the CA thinking around the development of green financial incentive options and we would welcome discussions on how we can work together in this regard.

## Representing energy consumers in the policy development process

We welcome the ongoing presence of CA on the REC Performance Assurance Board and encourage further engagement and collaboration with RECCo and the REC. The design of the REC is a departure from traditional industry codes insofar as any person or organisation is entitled to raise a REChange Proposal. Should CA identify areas where the REC arrangements can be improved, we would be happy to discuss any suggestions and/or to support CA if it chooses to pursue the option of raising a REC Change Proposal..

## Additional considerations

As set out in our draft strategy and forward work plan, we will establish a comprehensive consumer insights framework, around which we hope to build an evidence-based consensus on a REC development roadmap. Whilst many REC Parties undertake valuable work on customer insights, we are mindful that third party research and insights can provide a rounded view of issues and challenges faced by consumers. To this end, we are also considering the development and maintenance of a consumer issues log in relation to retail energy, that will be open to all stakeholders to use and input to. This issue log will help inform and prioritise our development of the REC, amongst other things. Input from CA in the development of this would be most welcomed.

## Closing remarks

CA identify a range of areas where development of the energy retail market is a key factor in meeting consumer needs and providing protections. Working with bodies such as RECCo and utilising tools such as the REC can help develop a future governance landscape that meets the needs of consumers. We would welcome the opportunity to discuss these points further.

Kind regards,

Suchitra Hammond  
**Senior Strategy Manager**