

Received 10 February 2025

Dear Ofgem,

On behalf of the [End Fuel Poverty Coalition](#) I have been asked to respond to the Forward Work Programme to highlight two key concerns.

### **Fuel poverty as a priority**

While we welcome Ofgem's commitment ensuring decarbonisation schemes work to alleviate fuel poverty (p14), we are concerned that this is the only mention of "fuel poverty" in the entire Programme of work.

Similarly, consumers' bills are only mentioned in one place (p10) and only then in the context of improving transparency of bills and support for some groups of customers. The Programme appears not to appreciate the role Ofgem has in reducing bills through its decisions.

While we are reassured that protecting consumers from excessive costs (p4) will be a focus, we feel more clarity should be placed on what "excessive" would be defined as. Any decision which leads to an increase in customers' bills would be unwelcome in the current economic climate.

An example of a change which could be made would be to alter 2.4 (p10) to ensure that it is more explicit that Ofgem's decisions will prioritise the needs of consumers over all else.

### **Joined up consultations**

We appreciate that the energy market is a complex beast, with decision making responsibilities stretched across multiple bodies with vast stakeholder networks.

However, after reflecting on the previous 12 months, Coalition members felt that there could be a more joined up approach to consultations and requests for input.

This is especially important when asking for feedback from charities and consumer groups where resources are a fraction of those available to commercial organisations and industry.

For example, recent consultations on consumer debt and on heat networks have meant charities working with groups affected most by these consultations were having to provide information multiple times and in multiple formats to organisations (e.g. Ofgem and Government Departments) which should be working more closely together.

Splitting consultations also means it is more difficult for charities to analyse the knock on impacts of decisions in one consultation on other areas of policy.

It would be useful if this feedback could be reflected in consultations moving forward.