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Dear team,

Mank thanks for the opportunity to respond to Ofgem's consultation on its forward work plan. We note that this consultation focuses on key new reform projects required to move to a clean power system by 2030.

Fair By Design would just like to make one point in relation to developing the evidence base to ensure that consumers, and in particular low-income consumers, are not left behind in the transition to net zero. **We would like to see Ofgem committing to carrying out a distributional analysis of the impact of introducing market wide half hourly settlement** and hence more dynamic/variable tariffs. There have been a number of pilots carried out to date but Ofgem needs to establish what the impact will be across all consumers to be able to "protect the interests of energy consumers, both now and in the future". This should inform Ofgem's own actions and also it's recommendations to Government to ensure that those on low incomes and in more vulnerable groups have equitable access to smart technology, and that future poverty premiums are not created.

About Fair By Design

Fair By Design is dedicated to reshaping essential services such as energy, credit, insurance and payments so that they don't cost more if you are living in poverty – also known as the poverty premium. Fair By Design collaborates with regulators, government and industry to design out the poverty premium. Our Venture Fund provides capital/funding to grow new scalable ventures to innovate the market and design out the poverty premium. Ascension manages the Fair By Design Fund. Fair By Design is managed by the Barrow Cadbury Trust on behalf of a group of foundations.

In the context of the energy market, we believe that households on low incomes/living in poverty should not incur a poverty premium based on not being an "active" consumer or due to the way they pay for their energy.

Please note that we consent to public disclosure of this response.

Best regards,

Maria

Maria Booker (she/her)
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Barrow Cadbury Trust