Flexible and Responsive Energy Retail Markets

Northern Powergrid's response to the Ofgem and Department for Business, Energy and Industrial Strategy (BEIS) consultation

KEY POINTS

- We are seeing unprecedented change in the energy system. The progress of smart technology and the digitisation of the economy are pervasive trends which will fundamentally change the dynamics in the energy market**. These present an opportunity the country must grasp. DNOs becoming DSOs have a role to play in making a world in which everyone benefits from reliable and zero marginal cost renewable power and no energy is wasted.** Our vision for DSO is for a trusted and neutral platform able to optimise the whole energy system and underpin the rapid transition to carbon-free electricity, transport and heat; a system with the customer at its heart. **Broader and more strategic thinking is required in order to deliver outcomes needed by society**.
- **The retail market should not be viewed in isolation**, but as one of **a range of markets and services needed to fulfil customers' energy needs** including the opportunity to make the most of their flexibility and assets through participation in markets for local energy and services to networks.
- It is important to recognise that **energy retail markets can contribute to whole systems optimisation**: allowing those suppliers who wish to do so to specialise and offer niche products and services to targeted groups of customers can improve the efficiency of the whole system to the benefit of all customers, as well as delivering direct benefits to participating customers.
- **The changes taking place are wider than the supply market**. Any decisions need to be taken in a wider energy system context considering other issues in parallel. That means BEIS and Ofgem need to have a common view of the overall policy and an agreed allocation of roles and responsibilities.
  - The financial benefit that can be delivered by flexible and responsive energy markets needs to be put in the context of the potential benefit of effective measures to improve energy efficiency of buildings. Energy efficiency reduces financial burden for customers struggling with energy costs, reduces carbon emissions, and provides further financial benefits in terms of right-sizing the generation and network infrastructure to meet efficient energy requirements.
  - Fuel price distortions are hampering fairness and achievement of our climate goals: the energy market is currently distorted by the cost of carbon not being reflected in fuel prices, resulting in market distortion between fuels and acting as a drag on achieving climate goals. Fuel cost parity should be achieved to deliver change – on both a carbon intensity and a fiscal basis.
- To properly address the issues raised, Ofgem and Government must together, fundamentally review and decide what is being targeted with fiscal interventions, regulations and market structures. **If a holistic approach is not taken unintended consequences and perverse outcomes and wasted money are almost guaranteed.**

Detailed responses to consultation questions

We have answered those questions where as a local network operator we have the most evidence to provide.

Q1. Do you agree with our vision for the future of the energy retail market, the outcomes we are seeking to achieve and our characterisation of the key challenges we need to overcome?

We agree with the customer-centric nature of the vision but think that more holistic and more strategic thinking on the outcomes is required to ensure that the future energy retail market contributes to whole system optimisation, is future proof and delivers for customers across all their energy needs.

1) We agree that market structures and regulation should allow innovation to take place and new business models and services to emerge, putting customers at the heart of the transition to a smart low carbon energy system and in a way which is socially inclusive. However, we would encourage more holistic and more strategic thinking on this.

   Future proofing

2) While the target of net-zero emissions by 2050 provides the backdrop to this consultation, the set of desired outcomes does not explicitly include driving the deep and rapid decarbonisation commensurate with the climate emergency declared by UK government. We think that it is important that the urgent and radical changes needed are delivered in a customer-centric manner, and that the transition to a low carbon energy system will be faster if it is policy-driven rather than relying on customers to lead. In the context of net zero targets and urgency, there is a place for policy-led transition.

3) A 'no-regrets' approach should be taken to ensure that retail market reforms do not create any barriers to implementing additional future policy actions to reduce carbon emissions and which would be a very strong driver of innovation, demand reduction and decarbonisation i.e. the future retail market should enable government to intervene to accelerate the rate of emissions reduction by providing the levers within the retail market to deliver that objective.

   A more holistic approach across all aspects of the whole energy system

4) It is crucial that the future energy retail market is developed as part of a coherent energy policy framework that optimises the UK energy system as a whole, taking account of

   - current, emerging and future energy markets and the transition to distribution system operation;
   - whole systems optimisation and the interactions between retail markets, generation mix and generation capacity;
   - all fuel types; and
   - the synergies between, and the issues faced by, transport, heat, and power sectors alike, and not in isolation.

Current, emerging and future energy markets and the transition to distribution system operation

5) The retail market should not be considered in isolation but as one of a number of markets needed to fulfil customers' complete energy needs. This includes the includes the opportunity to make the most of their flexibility and DER assets through participation in local energy markets, peer-to-peer trading and in markets to provide services to Distribution System Operators (DSOs) and the Electricity System Operator.

6) Our Customer-Led Distribution System project[1] has shown that owners and users of DERs can obtain real value from their flexibility and their assets by participating in local energy markets that are designed for that purpose. This is a world in which customers can play an active part in contributing to the UK's decarbonisation and be rewarded for doing so, at the same time as delivering benefit for everyone by improving the efficiency of the energy system and reducing its cost.

7) We have demonstrated how local energy markets can incentivise customers with flexible load to follow and buy locally produced renewable energy, and that owners and users of DERs can get significantly more value from their assets by participating in local energy markets compared to providing services only to the distribution network. **The benefits to DERs from participating in local energy markets are between 20 and 63 times greater than the benefits from participating in the network services market**, dependent on the network conditions e.g. whether the networks are dominated by domestic or commercial load and whether they are lightly or heavily loaded. The benefits to DER owners and users from local energy markets are estimated to be of the order of £90bn during the period 2030 to 2050.

8) Local market arrangements should be put in place and designed with the objective of maximising the value of DERs for their owners and users and for the energy system as whole. These arrangements should be appropriate for the local DER mix and penetration levels, their times of operation, and the characteristics of local demand.

9) The introduction and evolution of local energy markets will enable increasing volumes of energy to be supplied by local renewable sources. Key to this is the introduction of real-time local energy markets which deliver value to both the seller, such as a customer with PV, and to the buyer with flexible load such as EVs.

10) With the value to customers being significantly higher than the value from participating in markets to provide services to address network congestion and constraints, there is an imperative to ensure that there is sufficient focus in the consideration of future retail markets on how to implement local energy markets. Going forward, the provision of network services needs to be considered alongside the higher value available to customers of trading energy.

[1] https://www.northernpowergrid.com/innovation/projects/customer-led-distribution-system-nia-npg-19

Whole systems optimisation and Interactions between retail markets, generation mix and generation capacity

11) With a move to a low carbon electricity system, generation will become dominated by 'must dispatch' and 'zero-marginal costs of dispatch' generation: inflexible nuclear and intermittent renewable generation. The flexibility in the system therefore will need to increasingly come from the demand side rather than the supply side if we are to avoid building very large amounts of resource intensive storage or carbon intensive peaking plants. This means that the future retail market should be designed in a way that actively enables the increasing levels of flexibility that are needed to deliver decarbonisation. Local energy markets are expected to make an important contribution to our smarter more flexible energy system.

12) The decarbonisation of the energy system also requires us to make the most of the installed low carbon generation (zero marginal cost of dispatch) capacity by avoiding curtailment. This entails matching of load and generation, and the more local the matched generation and load are, the better. The wholesale energy market is not configured to enable this type of matching of load and generation, and the supply licence is a barrier too.

13) At present the only way around these limitations is to set up inefficient private networks where generators act as unlicensed energy suppliers over private networks. We discuss the problems associated with this in our response to question 10.

14) There is therefore a strong case for developing and implementing alternative retail market arrangements to allow local energy markets where customers can sell their generation or battery output to local customers with flexible demand, enabling local matching of load and generation.

A level playing field across all fuel types

15) A level playing field is needed for all fuels, and fiscal distortions/market failures should be avoided. At present, there is a disproportionate fiscal burden on electricity compared to gas. Furthermore, high carbon content fossil fuels are not subject to Climate Change Levy (CCL) and are taxed disproportionately to their carbon content. The price of a fuel needs to be reflective of its carbon content. We explore this further in our response to questions 6 and 10.

The synergies between, and the issues faced by, transport, heat, and power sectors alike, and not in isolation.

16) Decarbonisation of heat and transport will result in an increase in electricity demand and a likely increase in electricity peak demand. Much of the negative effects of this can be mitigated by smart grid and grid flexibility services, in conjunction with smart technologies like heat pumps, storage heaters, batteries and smart appliances to shift the electricity demand outside the peak. If the heat and transport decarbonisation go ahead faster than the measures to mitigate the impact, the result will be a need to invest in otherwise avoidable network and generation infrastructure to meet peak demand and which have low utilisation rates

17) It is therefore essential that the pathway to decarbonise heat and transport includes the right features at the right time so that the mass transition of retail customers to the new heat and transport technologies and market offerings is smart from the beginning and that network and generation capacity can be right-sized.

18) If these new technologies are adopted with current energy use behaviours, this is likely to require additional network and generation capacity and those behaviours may be difficult to change to be 'more smart' at a later date. In the case of EVs, out of habit transposed from the current supply chain, and because of range anxiety, customers are tempted to take as much energy as they can when they charge. Taking energy in a more managed way would be preferable in both cost and security of supply terms. This new behaviour can be brought about through a mix of economic incentive (time-of-use rates), technology settings (eg set the charger to use the fact that the vehicle will be plugged in overnight and so does not need to draw power at full charging capacity), a ubiquitous charging infrastructure, and education.

19) Recommended actions include considering how new infrastructure for EVs and associated grid reinforcements can be sustainably funded[2] and considering investing ahead of need to enable the decarbonisation transition to be expedited and in a way that is smart eg investing in smart EV charging infrastructure.

20) In summary, what is required is a holistic and integrated view of all the necessary transition pathways for

- decarbonisation of heat and of transport
- the rollout of smart technologies, including smart EV charging infrastructure
- the DSO transition
- flexibility markets and future energy markets
- generation and network infrastructure

Q2. Are there examples of new products, services and business models that would benefit current and future consumers, but are blocked by the current regulatory framework?

It is likely that technology, cost and consumer acceptance are often more significant barriers to some new products, services and business models than the current regulatory framework for energy retail…

21) In some cases, blockage might be in the consumer interests, if the new service or business model would disrupt energy system stability. The interdependencies in a complex system necessitate trade-offs and the imposition of rules on the participants. Not everything can be possible all of the time.

22) Technology, cost and consumer acceptance are quite possibly more significant barriers to uptake of some new approaches than the current regulatory framework. This is where government policy can be more relevant than regulatory frameworks. For instance VAT on home batteries is currently 20%, meaning that this "peak energy saving" technology is at a disadvantage to more traditional energy saving products that face 5% VAT.

[2] More information in our response to the 2017 inquiry "EVs: developing the market and infrastructure" http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/business-energy-and-industrial-strategy-committee/electric-vehicles-developing-the-market-and-infrastructure/written/72740.pdf

…but the current supply licence is a barrier and future supply market arrangements are still not settled…

23) The development of smart systems technology and digitisation of the economy are increasingly in tension with the supplier hub model, which is look increasingly dated; it is becoming an impediment to new business models such as peer-to-peer trading in local energy markets which can deliver direct benefit to participants and more widely, though system optimisation, to all customers (see our response to question 1).

…and the regulatory framework for electricity distribution is based on approach that is out of step with a smart flexible energy system which may lead to perverse incentives to the detriment of customers, and which will need to evolve so that future DSOs can facilitate future markets.

24) Network Output Measures are based around passive networks. In a highly active and efficiently run distribution system, increasing amount of flexibility and intelligent investment decisions will result in load indices being higher than they have been historically.

25) DNOs, becoming DSOs, are able to play a neutral role as market facilitators on which other market participants depend. DSOs should provide the smart common infrastructure (or physical trading platform) upon which this competitive energy services model may operate, also tendering for non-network solutions to solve network issues where doing so makes economic sense

Q3. Are there current or emerging harms to energy consumers which are currently out of scope of the regulatory framework? Do these differ for domestic and non-domestic consumers?

Domestic energy consumers are being harmed by poor quality housing stock which increases their energy consumption and costs.

26) There is a high likelihood of a price increase for the most commonly used fuels as a result of any fiscal changes which could create negative externalities for the fuel poor and vulnerable consumers. However, the UK offers significant potential to increase the building energy efficiency standards for both new build and existing properties.

27) Tightening the building standards for energy efficiency to meet the standards of zero carbon buildings or above is a vital action for delivering a positive social impact while driving the decarbonisation of heat. There is scope to introduce support mechanisms to ensure fairness and to avoid adverse impacts for fuel poor and vulnerable consumers as a perverse outcome of achieving heat decarbonisation objectives.

Non-domestic customers (and indirectly domestic customers) are harmed by a non-level playing field internationally in climate levies on energy

28) We recognise that climate levies may lead to differences in the energy cost component of UK products compared to imported products and put UK businesses at a disadvantage compared to international competitors, and that this may also contribute to the offshoring of carbon emissions rather than their reduction.

29) This could be addressed by replacing the climate change levy by a national carbon tax, applicable to all fuels, and a carbon tax border adjustment for products imported from countries that do not have an equivalent carbon tax regime.

Absence of level playing field for fuels / externalities

30) The absence of a level playing field for fuels and their associated externalities is outside the current regulatory framework and is material for customers. We discuss this in our response to question 6.

Consumers' needs may not be best served by the emergence of a highly cost-reflective system

31) Across network charging, the pricing of intermittent energy and payments for flexibility, it is generally the case that price signals that better represent underlying costs are considered to be a key tool to deliver overall system optimisation and so overall cost minimisation. However, full pass-through of flexibility costs and opportunities/risks to the end customer may not be an acceptable outcome for many customers who value a level of stability and predictability in the energy prices they experience. Indeed in the current energy retail market, suppliers provide a buffer between wholesale market price variations and network charges and the prices seen by customers.

32) There is a tension between using sharply cost reflective price signals for system optimisation and providing the price stability and predictability that many customers value. The appropriate balance needs to be understood. Further, there may be merit in exploring whether and how price signals that are sharp enough to have the desired effect can be combined with mechanisms to provide a degree of stability to customers.

Q4. Would it be beneficial to allow suppliers to specialise and provide products and services to targeted groups of customers? If so, how can this be delivered while balancing the need for universal service?

The energy system has different characteristics in different places. Enabling suppliers to provide location-based products and services will allow customers to benefit from new value propositions.

33) A smart flexible energy system makes the most of the energy assets in its area (customer flexibility, DG, waste heat, geothermal potential, on/off gas/hydrogen grid etc). Traditional energy suppliers have often failed to engage locally and harness the opportunities of decentralised and community energy which are closely related to the characteristics of the local energy system.

34) Allowing specialised products and services for groups of customers targeted by locality can deliver value to customers and increase the overall efficiency of the whole energy system. We expect that this would stimulate activity in local energy markets, peer-to-peer trading and other new services such as 'heat as a service'.

35) DSOs, based in the communities they serve, working with community energy partners are better able to unlock the potential. The DSO is at the interface of what is commercially preferable (for local balancing), and physically possible (network capacity), which gives it a critical facilitation role.

Customers have different levels of flexibility. Enabling suppliers to provide flexibility-based products and services will allow customers to benefit from new value propositions.

36) In a low-carbon energy system, flexibility becomes more valuable to the system, so it is beneficial for suppliers to target new products and services to customers who can flexibly follow the available generation, whether this is from inflexible nuclear and intermittent renewable generation. An example could be a wind-twinning tariff that offers cheaper rates when there are high levels of wind generation.

Options for delivering a universal service offering

37) There are a number ways that a universal retail service offering could be assured, including either requiring every supplier to provide a universal service offering, or the universal service is provided for all customers under a franchise awarded through competitive tendering.

38) The Australian approach to car insurance provides an interesting perspective on how a universal service offering can sit alongside differentiated services in a competitive market. Third party insurance is a legal requirement and is acquired by the vehicle owner when paying the annual vehicle license charge to the state government i.e. there is one provider for a universal service offering and the provider is manages risk across all registered vehicles, and incurs no marketing costs. Comprehensive insurance is optional and provided by a competitive market with different offers available and consumers shopping around if the 3rd party insurance alone does not meet their needs.

Q5. Are incremental changes to regulation sufficient to support the energy transition and protect consumers? Or does this require a more fundamental reform, such as moving to modular regulation?

The current regulatory framework is already modular and provides platform for future regulation

39) The current regulatory framework is already modular, and can be switched on and off according to activity. It is possible to participate in electricity distribution without meeting the requirements of a generation or supply licence, for example.

40) That isn't to say that the current list of "modules" is long enough for the future. New activities are already growing or on the horizon, facilitated by changing technology and innovation. The consultation mentions examples such as switching services, service aggregators, and flexibility providers. Where such activities don't fit into one of the existing categories, a new class of regulation may well be needed to ensure the system remains co-ordinated and prevent consumer harm.

Q6. Are there any other potential market distortions we should be considering as part of our review?

The cost of carbon is not reflected in fuel price, resulting in market distortion

41) The current fiscal distortions affecting fuel prices need to be addressed. There is a market failure stemming from different, inconsistent taxation of different fuels and fuel prices not being reflective of externalities, such as the abatement cost of greenhouse gas emissions.

42) A number of our customers are planning to decarbonise their business activities. However, to industrial entities, high electricity cost remains the main barrier prohibiting them from electrifying processes where gas is traditionally used and substantially increasing their OPEX.

43) Customers actively supporting the decarbonisation (at present) often face increased costs. Due to unaccounted externalities, fuel and technology choices that could benefit the individuals, businesses, and the society, and which support the decarbonisation agenda, are not the default and can be difficult to justify on economic grounds.

44) This has two effects: firstly to slow decarbonisation, and secondly to create distortions and free-riding in who pays for decarbonisation. For example, a household with a heat pump may pay a more for their heating especially when taking into account capital costs, and are contributing to the greater societal benefit of clean air and lower carbon emissions, but a household heated by fossil fuels benefit from the costs borne by the heat pump household for the benefit of the society.

45) In line with our responses provided to the *A future framework for heat in buildings* and other consultations, we believe that:

- Although, on average, electricity emissions intensity is currently higher than gas (on a gCO_2e/kWh basis)[3], we expect that the emissions from electricity will continue to fall substantially over the next 10 to 20 years and low-carbon electricity will have a central role to play in the future energy mix, including as a key way of decarbonising both heat and transport.
- One of the main barriers for the uptake of electric heating currently is that electricity is not competitively priced, when compared to other fuels. Electricity to natural gas price (BEIS central estimate[3]) ratio, depending on sector, is 4.1:1 (domestic), 4.6:1 (commercial/public sector) and 5.2:1 (industrial). This is driven, in part, by how electricity and gas are taxed. To efficiently meet decarbonisation targets, it is important that electricity and other sources of energy are taxed on a fair basis, reflecting their carbon intensity and wider environmental effects – this would allow different low-carbon technologies to compete fairly on their relative merits across the energy system.

Customers' ability to participate in current and future markets should not depend on their network operator

46) It is an important principle that customers should have the same opportunities to participate in future markets, regardless of whether they are connected to an iDNO owned network or a DNO owned network.

47) With developments across many parts of the energy system underway concurrently, including markets for network services, local energy markets, and the future arrangements for DSO, Ofgem and BEIS should ensure that this equality of opportunity for all customers exists in all future markets including DSO markets, ESO markets, retail markets including local energy and peer-to-peer trading.

[3] BEIS, 2019. Treasury Green Book supplementary appraisal guidance on valuing energy use and greenhouse gas (GHG) emissions. Data tables 1-19 supporting the toolkit and the guidance

Q10. What actions could government take to reduce any negative impact of Energy and Climate Change Policy Levies?

Fuel cost parity should be achieved to deliver change – on both a carbon intensity and a fiscal basis

48) Currently, policy costs are disproportionally levied on electricity bills, making up 15% of an electricity bill; this has created significant distortions in the market and is leading to inefficiency and perverse outcomes as bill payers are seeking ways to avoid these costs such as generating behind the meter and setting up inefficient private networks.

49) On occasions, the interaction of the fiscal / levy regime with the current supplier hub model has led to some far-reaching implications with perverse outcomes and inefficiencies and undermined the original vision for a fair whole energy system. These should be designed out of any new structure and not be allowed to perpetuate or be replicated.

50) As they seek to maximise the revenue stream from the combined heat and power (CHP) system installed, a number of bodies in the Northern Powergrid region are implementing or considering the option to act as unlicensed energy suppliers over private wires.

a. The private wire option is currently the easiest in the current licensing framework and the most appealing because it deducts from the electricity price the cost of the regulatory overhead and policy costs that would otherwise be levied (i.e. avoiding a 'tax' that is then paid by other customers). The effect of this is for the electricity system (and electricity bill payers) to cross-subsidise heat networks from which they do not benefit – in effect a hidden form of regressive tax.

b. In private wire networks the development of the heating and electrical infrastructure takes place 'behind the meter' optimising for nominal cost within the private network (driven in large part by fiscal interventions) rather than overall value. As such, an inefficient system is created potentially with duplication of electricity networks in the same streets and the cost recovery for existing DNO network assets then being avoided by those customers and increasing the costs for the remainder of the DNO customer base. This works to the disadvantage of the generality of customers and imposes wider societal and environmental costs.

c. Domestic customers are often left out from the benefits of this model but bear the cost of it: they carry their own share of costs plus the share of parties able to avoid environmental costs and network charges.

d. Building a private wire to maximise income, and to bypass the current supply licence framework (and in doing so environmental and social levies/taxes), is an infrastructure solution to a commercial and regulatory issue. We believe that customers deserve a commercial solution to a commercial issue.

51) Working with Ofgem, BEIS should evaluate the problems that are being created by the application of environmental levies and taxes to energy bills with the aim of applying taxes in a way that creates fewer perverse incentives. The inefficient development of networks (driven by customers seeking to avoid taxes) is just one such example, and we would encourage policy

makers to carefully consider the pros and cons of where they apply environmental social levies/taxes in the context of wider regulatory structures. As discussed above, the fiscal distortions found in fuel pricing is one of the main issues that, if addressed, could act as an enabler for transition to clean heating.

Provide support mechanisms to avoid disadvantaging customers who are vulnerable or on a low income.

52) Disincentives for a continued use of a fuel or technology are only effective if there is a scheme in place to support and facilitate the adoption of new technology, and enough information available to installers and customers. As an example, Norway has successfully demonstrated how, with low electricity prices, carbon tax on kerosene, kerosene boiler scrappage scheme and subsidy for low carbon heating technology, it is possible to significantly cut this high carbon fuel use.

53) We therefore believe that Ofgem and Government must together, fundamentally review and decide what and who is being targeted with fiscal interventions, regulations and market structures. Specifically:

a. which costs to socialise to deliver acceptable social outcomes and who pays for desired environmental policies, through which route;

b. which parts of the market to subsidise to promote security of supply and decarbonisation; and

c. what balance of public and private operations will best deliver efficient investment and drive service improvements for customers.

54) In particular, a solution is required to the regulatory distortions leading to behind the meter schemes where self-supply causes inequitable social outcomes. The driver has been the ability to avoid policy costs in electricity bills – creating lower costs for those participating and higher bills for the customers unable to take advantage. A key challenge is how the costs of regulatory interventions are distributed amongst energy bill payers.

55) It is inequitable if the entire customer base (including the fuel poor) pay for improvements that benefit those that are able to pay. This would be a regressive policy that repeats some existing failings of the current energy system (e.g. the avoidance of taxes by those customers that join private wire combined heat and power projects 'behind the meter').

Q11. Do you agree that now is not the time to make further changes on system and network cost recovery, metering and access to data as part of this retail market review?

Yes, we agree that now is not the time to introduce more change specific to metering or data.

56) The consultation identifies the current intensive meter-related activity and a number of initiatives regarding Access to Data. It is not yet clear what the outcomes will be of the majority of these, the degree to which they will impact industry players and what they will need to do differently. It makes sense to be realistic about the industry's capacity for change and to prioritise industry change activity. For all these reasons, we agree that now is not the time to introduce more change specific to metering or data

Work is in progress on system and network cost recovery, but price signals are generally not visible to customers

57) Ofgem and BEIS should be cognisant of the work on charging reforms already underway, and may want to consider obligating suppliers to pass price signals from DNOs through to customers.

Q17. What protections or support may be required to engage consumers in vulnerable situations in the future market?

The consultation document identifies a number of actions that could help. In addition, future DSOs can play a part in helping to engage customers in vulnerable situations in the future market.

58) As a DNO we are developing a strategy for a socially inclusive transition to DSO, guided by seven themes. Each of these themes seeks to leverage our unique role as a provider of regional infrastructure and a key player in the region for the benefit of vulnerable customers, and four of the themes relate directly to the question of future energy markets:

- Supporting a local, greener, cheaper electricity supply
- Understanding long-term distribution impact and advocating fairness
- Advocating and deploying a socially inclusive customer flexibility offer
- Promoting a responsible, secure use of data that results in positive outcomes for vulnerable customers

59) Ofgem and BEIS should give consideration to each of these themes in developing the necessary protections for vulnerable consumers in the future market.