

# Consultation Response

## Review of Electricity Market Arrangements

Department for Business, Energy, and Industrial Strategy.

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## **About this consultation**

The British Energy Security Strategy committed to review Britain's electricity market with the ambition of enabling safe and cost-effective decarbonisation of the electricity system by 2035. This Department for Business, Energy, and Industrial Strategy (BEIS) Review of Electricity Market Arrangements (REMA) consultation represents the first stage in this process. It assesses the options for ensuring Great Britain's (GB) electricity market can successfully harness the advantages of increased renewable energy generation and pass these onto consumers. This consultation focuses on the wholesale market with subsequent reviews proposed to consider implications for the retail market.

## **Key points and recommendations**

- Age UK agrees the Government must reform the electricity market to harness the benefits of decarbonisation, mitigate price volatility and reduce consumer prices.
- We support BEIS investigating reforms to marginal pricing to facilitate cheaper and cleaner electricity for UK consumers while ensuring energy needs are fully met.
- We welcome the Government's commitment to reliability and affordability at a time of heightened price uncertainty and consumer cost pressures.
- Further funding to ensure whole house energy efficiency retrofits are accessible for all lower income households will be essential to achieving REMA's objectives.
- This must include the remaining £1.4 billion of funding promised to the Home Upgrade Grant (HUG) in the 2019 Conservative manifesto.
- REMA risks entrenching inequalities like the loyalty penalty and poverty premium if it fails to account for the needs of vulnerable older consumers.
- Two key components of facilitating market engagement are ensuring tailored support and maximum accessibility are embedded throughout the REMA process.
- REMA should include a consultation on a social tariff which discounts energy bills for those most in need, automatically enrolls eligible households, is mandatory for all suppliers and complements, rather than replaces, existing consumer support.

## **About Age UK**

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances. In the UK, the Charity helps more than seven million older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people. Its work focuses on ensuring that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe and secure at home; and feel valued and able to participate.

## Introduction

Age UK is keen to ensure the needs of older consumers are fully accounted for throughout the REMA process and we warmly welcome the opportunity to respond to this initial consultation<sup>1</sup>. Our focus is to ensure that proposals work in the interests of vulnerable older consumers and that they are not excluded from the much-needed drive to decarbonise the electricity market.

The UK is making good progress in improving the role renewable energy sources play in powering homes and businesses, with renewables now accounting for the largest single source (38.7%) of our electricity generation<sup>2</sup>. Age UK agrees that reforming the electricity market would help better harness these benefits and reduce the risk of price volatility, ultimately benefiting consumers and improving security of supply.

We strongly welcome REMA's commitment to reliability and affordability of supply at a time of heightened price uncertainty and consumer cost pressures. October's 27% rise in the typical energy bill will lead to around three-in-ten (29%) older households in England being fuel stressed<sup>3</sup> this autumn and winter, up from around one in ten (10%) only last year<sup>4</sup>. With energy prices increasing, more than two thirds (67%) of people aged 60+ in Britain are worried about being able to heat their home when they want to, and more than half (54%) are worried about the impact of energy prices on their health<sup>5</sup>. While the Energy Price Guarantee (EPG) and Energy Bills Support Scheme (EBSS) are welcome short-term measures, REMA must address the ongoing risk of price volatility.

We therefore encourage BEIS to consider the longer-term consumer support required to ensure REMA is a success. REMA should include a commitment to consult on the introduction of a social tariff into the energy market. Age UK research shows that 72% of people aged 60+ in Britain support the introduction of an energy social tariff<sup>6</sup>. The tariff should discount energy bills for those most in need, automatically enrol eligible households and be mandatory for all suppliers<sup>7</sup>. It should also sit alongside, rather than replace, existing support like the Warm Home Discount and energy price cap<sup>8</sup>.

REMA must also commit to facilitate the widespread electrification of domestic heating. Household energy efficiency grants and funding for electrical heating for those on lower incomes are an essential component of this. New low temperature electrical heat pumps could help reduce consumer bills significantly, but they often require homes to be retrofitted with improved insulation to ensure they function efficiently. Even after the EPG around one in six older households in the highest energy efficiency bands (A-C) will be fuel stressed from October, but for the lowest bands (F-G) the figure increases dramatically to almost 9 in 10<sup>9</sup>. Vulnerable households must be supported to improve their household energy efficiency and electrify their heating systems if REMA is to succeed. Any additional funding must include the £1.4 billion shortfall in the Home Upgrade Grant's (HUG) allocated spend<sup>10</sup>.

BEIS cites<sup>11</sup> the importance of allowing consumers to engage with the innovative products REMA could facilitate. While this is a welcome goal many vulnerable older people are likely to face barriers to accessing these new products (e.g. dynamic time of use tariffs, smart technology). If accessibility is not front of mind, BEIS risk entrenching existing inequalities such as the loyalty penalty<sup>12</sup> and poverty premium<sup>13</sup>. REMA will fail in its objectives if the needs of older vulnerable consumers are not embedded throughout. Our below responses reflect this concern and propose solutions which will support REMA in successfully achieving its goals.

## **Consultation questions**

### **1. Do you agree with the vision for the electricity system we have presented?**

Age UK agrees that the Government must reform aspects of the electricity market to harness the benefits of decarbonisation, reduce the risk of price volatility and deliver the benefits to consumers. BEIS's REMA proposals represent an ambitious first step, including a welcome commitment to reliability and affordability at a time of heightened price uncertainty and consumer cost pressures. However, we are keen to ensure the needs of vulnerable older consumers are better accounted for in these plans.

Age UK has extensive experience of supporting vulnerable older households with their day-to-day energy needs. This includes help with billing, metering, supplier communications, and accessing financial support and energy efficiency schemes. We are concerned that unless their needs are better accounted for, initial proposals for REMA may exacerbate the barriers they face in the energy market and present new challenges. This risks entrenching a two-tier electricity system with vulnerable consumers missing out on renewable options, smart appliances, dynamic time of use tariffs and associated cheaper prices.

We provide specific detail on the risks to certain older consumer groups in response to question two, alongside suggestions for how to embed their needs into the multi-year REMA process.

### **2. Do you agree with our objectives for electricity market reform (decarbonisation, security of supply, and cost-effectiveness)?**

Age UK welcomes the stated goals of REMA. Decarbonisation, security of supply and keeping costs down for consumers are crucial objectives to ensure households are protected from wholesale price volatility. However, there are barriers to ensuring REMA can successfully achieve these objectives. We address each of these below but wish to reinforce that BEIS should include a further commitment to ensuring fair access to the

revised electricity market for vulnerable consumers. Consumer fairness must be the golden thread which runs through REMA as it progresses. BEIS should make this a separate stated objective of the Review and focus on those households least able to engage with the market and access financial support. This includes the 770,000 older people not in receipt of their Pension Credit entitlement<sup>14</sup>, two fifths of those aged 75+ not using the internet<sup>15</sup> and market disengaged households who are more likely to be struggling financially<sup>16</sup>.

Part of ensuring fairness must include REMA addressing the commercial supply trap. Many residential electricity customers still derive their supply from a commercial contract either directly, or indirectly through a landlord or site owner. REMA must include a commitment to ensure residential dwellings, regardless of whether their supply is delivered via a domestic or commercial supply contract, should be treated as domestic customers. This would extend consumer support like the default tariff price cap and Warm Home Discount to more vulnerable households and ensure REMA delivers on its commitments. Care homes, park homes, and many social housing tenants are among those who would benefit.

## **Decarbonisation**

Age UK supports the proposal to move to a pricing system which accounts for the increasing proportion, and cheaper price, of renewable energy sources. BEIS cites<sup>17</sup> the importance of allowing consumers to engage with smart technology, heat pumps and other innovative consumer products. Our concern is many vulnerable older households will face both installation and operational obstacles to using these new systems. This may lead to them being locked out of the full benefits of REMA.

While it is crucial to design a wholesale market which ensures renewables are accessible, consumers benefit most when they can harness the advantages. This means ensuring they can access electrical heating systems and transition away from expensive fossil fuel alternatives.

1.5 million households in England lack a gas network connection and rely on alternative heating fuels (e.g. oil, coal, bottled gas)<sup>18</sup>. These homes off the gas grid endure a higher and deeper level of fuel poverty than those with a gas connection<sup>19</sup>. The Home Upgrade Grant (HUG) was designed to support these households to electrify, but funding has fallen £1.4 billion short of 2019 manifesto commitments<sup>20</sup>. While other programmes provide support for a wider range of households, funding still falls short of what is needed to truly harness the potential of REMA. Age UK research shows that 76% of people aged 60+ in Britain want the Government to provide additional funding to households on lower incomes so they can gain access to household energy efficiency improvements<sup>21</sup>.

Fully subsidised multi-year funding of whole house energy efficiency retrofits and electrical heating systems for those on lower incomes will be essential to achieving REMA's

objectives. This must include a commitment to provide the additional £1.4 billion of funding for the HUG scheme, although this alone is unlikely to be sufficient. Age UK supports BEIS's commitment to reforming marginal pricing (see response to question 21) but the full benefits of this will only be felt by consumers who can access efficient electrified heating.

### **Cost-effectiveness**

REMA will fail in its objectives if the needs of older vulnerable consumers are not embedded throughout. BEIS cites<sup>22</sup> the importance of allowing consumers to engage with smart technology, heat pumps and other innovative consumer products to reduce consumer costs. While this is a goal we support, the reality is that many older people will face exclusion from these products.

While the culmination of the REMA review may reward consumers who can engage it is important it does not punish those who can't. BEIS specifically states that 'consumers will not be unfairly exposed to price signals that they cannot respond to'<sup>23</sup>. From experience we know this has not been the case even in existing markets, let alone future ones typified by increased complexity (e.g. dynamic time of use tariffs, in-home smart technology).

Maximising internet access will be a key component of REMA and its facilitation of consumer market engagement. Ofgem data shows that households which do not use the internet are almost twice as likely to be market disengaged<sup>24</sup>. With around two fifths of those aged 75+ not using the internet<sup>25</sup> this creates significant barriers to electricity market engagement. If BEIS further complicate the market without digital exclusion and wider accessibility issues being front of mind, they risk entrenching existing inequalities. This will include the loyalty penalty paid by the nearly two thirds of consumers who do not switch from their default tariff<sup>26</sup> and the poverty premium inflicted on people on lower incomes when they pay for essential services<sup>27</sup>.

Two key components of facilitating market engagement are ensuring tailored support and maximum accessibility. In February 2022 Age UK ran two focus groups with older people to explore their views of smart homes. The participants identified clear benefits (e.g. convenience, control, and automated support) and drawbacks to smart technology (e.g. lack of a stable internet connection, digital skill needs, data privacy concerns and people with certain disabilities facing exclusion). Concern was expressed that some older people could be alienated by a drive to digitalising their domestic spaces.

Nonetheless, participants suggested numerous solutions including tailored assistance at installation, ongoing training and support sessions, improved internet connectivity and bespoke support for rural areas. Similar themes were discovered during the smart meter rollout, where inadequate advice during meter installation left many older consumers feeling frustrated and unable to engage<sup>28</sup>. Tailored advice<sup>29</sup> and accessible in-home displays<sup>30</sup> were seen as essential in addressing this.

We strongly encourage an approach to REMA which focuses on ensuring tailored support and improved accessibility for vulnerable consumers to ensure the technology and appliances REMA facilitates (e.g. dynamic time of use tariffs and smart technology) are fully accessible. This will maximise the chances of REMA successfully passing on the reduced costs associated with renewable electricity to consumers, while allowing households to respond to price signals and decarbonise their homes.

### **Security of supply**

With the power outages storm Arwen and Eunice precipitated last year, the fear of losing their electricity supply is still fresh in the minds of many older people. Reports of potential blackouts this winter are a continuing reminder of the importance of security of supply. The war in Ukraine has only reinforced the critical need to diversify our electricity generation sources. Demand must always be matched by supply, particularly for the most vulnerable consumers such as isolated rural communities and those relying on life saving medical equipment.

Age UK agrees that successfully utilising the UK's extensive renewable energy resources and delivering them to consumers through the electricity grid will help mitigate price volatility and ensure we have a more secure energy future. Part of this is ensuring that REMA harnesses the power of renewables like wind and solar.

To avoid continued reliance on fossil fuel backups to meet peak demand REMA must also consider improving the UK's energy storage capacity (e.g. battery storage) to ensure electricity can be put onto the grid during peak periods when renewable generation is lower. It is essential that REMA accounts for potential dips in supply which could leave consumers without power.

### **3. Do you agree with the future challenges of an electricity system that we have identified? Are there further challenges we should consider? Please provide evidence for additional challenges.**

BEIS has mentioned policy interactions with invaluable household energy efficiency schemes such as the Energy Company Obligation (ECO). We wish to reinforce that one of the major flaws in REMA is that many of the most vulnerable consumers will remain unable to access electrified heat and this should be seen as a major challenge to delivery (see response to question 2, decarbonisation). Schemes like ECO and HUG will be essential to ensuring lower income households can access whole house energy efficiency retrofits, which are essential to facilitating the most efficient and cheapest to run electrified heating systems.

REMA should also work to alleviate public anxiety regarding electrified heating systems. Concerns regarding installation, maintenance, and adapting to new technology are key areas for BEIS to address if take up is to be encouraged. Research for Age UK<sup>31</sup> showed

that while generally supportive, many people aged 55 & over in the UK are still opposed to replacing fossil fuel boilers with new electric heating systems (20%), while others are undecided (10%) and many have no view on the subject (16%)<sup>32</sup>. This represents a lot of older people who still need persuading of the merits of an electric heating system.

Nonetheless, more than half (55%) were in favour of phasing out fossil fuel boilers over time and replacing them with new electric systems; 39% in favour so long as installation costs are similar to new fossil fuel systems and 16% in favour regardless<sup>33</sup>. This demonstrates the importance that the cost of electric heating systems will play in persuading older people to favour them as replacements for fossil fuel boilers.

Age UK supports the rollout of efficient, durable, and cost-effective electrical heating, but BEIS must ensure that part of REMA's focus is helping alleviate the anxieties some people still have. Most are not against installing new technology – instead they are concerned that they won't be adequately supported to adapt to it. Our experience and research show that tailored support at installation, ongoing advice and improved accessibility to electrical heating systems are critical components of addressing this.

BEIS also recognises<sup>34</sup> that REMA may need to consider whether and how the market incentivises people to reduce their electricity consumption. As explained previously (see response to question 2, cost-effectiveness) when considering incentivising people to reduce consumption it is important to account for whether vulnerable consumers can respond to these incentives. This will be a major challenge REMA will need to address.

## **21. Do you agree that we should continue to consider reforms that move away from marginal pricing?**

Age UK supports reforms to the marginal pricing system subject to BEIS devising a mechanism for ensuring this provides a reduction in consumer costs and maintains consistency of supply. We agree in principle that as the UK transitions away from fossil fuels the cost of natural gas, coal and oil should no longer be the dominant factor in determining the price consumers pay for their electricity. This is particularly important as fossil fuels become a smaller component of our energy supply.

The energy market is presently underpinned by marginal pricing – meaning that the price per unit (kWh) of electricity is determined by the last energy source delivered onto the grid to meet demand in any given half hour period. Energy sources are placed into what's called a merit order. Renewables are often first in the merit order, meaning they are brought onto the grid earliest as they generally have the lowest marginal costs<sup>35</sup>. This is followed by nuclear, coal and natural gas. Oil also sits within the framework but is less commonly used. Because of the speed at which it can be switched on and its historical reliability as a source of power generation natural gas is generally the last fuel source to



be switched on to meet demand<sup>36</sup>. As a result, the increasingly volatile and expensive cost of natural gas often determines the final price paid per unit (kWh) of electricity.

One of REMA's proposals is to investigate adjusting marginal pricing to allow for cheaper renewable sources to regularly determine the unit price. In 2021/22 renewables made up the highest proportion of our electricity supply (38.7%), followed by natural gas (38.5%), nuclear (16.1%), coal (3.8%) and other sources (2.9%)<sup>37</sup>, so it makes sense that we gradually move away from a pricing system based on fossil fuels.

We strongly agree with REMA's goal of ensuring the future electricity market is reliable and affordable. To ensure this, it is crucial that consumers reap the benefits of cheaper renewable electricity sources and no longer have their unit rates determined by volatile fossil fuel prices. As a result, we support BEIS investigating reforms to marginal pricing to facilitate cheaper and cleaner electricity for UK consumers while ensuring energy needs are sufficiently met during peak demand.

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<sup>1</sup> BEIS, 2022. Review of Electricity Market Arrangements. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1098100/review-electricity-market-arrangements.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1098100/review-electricity-market-arrangements.pdf). [Accessed 25/09/22].

<sup>2</sup> BEIS, 2022. Fuel Mix Disclosure Table. Department for Business, Energy, and Industrial Strategy. [Online]. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1095492/fuel-mix-disclosure-august-2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1095492/fuel-mix-disclosure-august-2022.pdf). [Accessed 02/10/22]. Pg2.

<sup>3</sup> We define households experiencing fuel stress as households spending more than 10% of their after-tax income on energy costs, so as to maintain an adequate standard of warmth. This definition was used to calculate the fuel poverty statistics in England from 2001 to 2011, and continues to be the definition used in Wales, Scotland, and Northern Ireland to calculate their respective fuel poverty statistics.

<sup>4</sup> Age UK, 2022. Research briefing: Estimating the impact of the Energy Price Guarantee (October 2022) on older households in England. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/estimating-the-impact-of-the-energy-price-guarantee-epg-on-older-households-in-england-september-2022.pdf>. [Accessed 02/10/22].

<sup>5</sup> Online and CATI survey conducted by Opinium on behalf of Age UK between 2nd – 20<sup>th</sup> September 2022. Sample of 1402 older adults (60+) in Great Britain, weighted to be nationally representative.

<sup>6</sup> Online and CATI survey conducted by Opinium on behalf of Age UK between 2nd – 20<sup>th</sup> September 2022. Sample of 1402 older adults (60+) in Great Britain, weighted to be nationally representative. The question was asked: 'To what extent do you agree or disagree with the following statements: The government should introduce a social tariff (a discounted energy bill tariff for people on lower incomes)'.

<sup>7</sup> NEA, 2022. Solving the Cost of Living Crisis: The case for a new social tariff in the energy market. National Energy Action and Fair by Design. [Online]. Available at: [https://www.nea.org.uk/wp-content/uploads/2022/07/2022\\_Solving-the-cost-of-living-crisis\\_v02.pdf](https://www.nea.org.uk/wp-content/uploads/2022/07/2022_Solving-the-cost-of-living-crisis_v02.pdf). [Accessed 02/10/22].

<sup>8</sup> NEA, 2022. Solving the Cost of Living Crisis: The case for a new social tariff in the energy market. National Energy Action and Fair by Design. [Online]. Available at: [https://www.nea.org.uk/wp-content/uploads/2022/07/2022\\_Solving-the-cost-of-living-crisis\\_v02.pdf](https://www.nea.org.uk/wp-content/uploads/2022/07/2022_Solving-the-cost-of-living-crisis_v02.pdf). [Accessed 02/10/22].

<sup>9</sup> Age UK, 2022. Research briefing: Estimating the impact of the Energy Price Guarantee (October 2022) on older households in England. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/estimating-the-impact-of-the-energy-price-guarantee-epg-on-older-households-in-england-september-2022.pdf>. [Accessed 02/10/22]. Pgs9-10.

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- <sup>10</sup> EEIG, 2022. Energy Security Starts At Home. Energy Efficiency Infrastructure Group. [Online]. Available at: [https://www.theeeig.co.uk/media/1131/eeig\\_invest-to-save-06-22-03.pdf](https://www.theeeig.co.uk/media/1131/eeig_invest-to-save-06-22-03.pdf). [Accessed 25/09/22]. Pg2.
- <sup>11</sup> BEIS, 2022. Review of Electricity Market Arrangements. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1098100/review-electricity-market-arrangements.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1098100/review-electricity-market-arrangements.pdf). [Accessed 25/09/22]. Pg15-16.
- <sup>12</sup> The loyalty penalty was, historically, paid by the nearly two thirds of consumers who did not switch from their default tariff. It is of less relevance to the present volatile energy market where the default tariff is often the cheapest tariff available, but the loyalty penalty is likely to return as an issue once energy prices stabilise.
- <sup>13</sup> The poverty premium is inflicted on people on lower incomes when they pay for essential services. See: Fair by Design, 2022. What is the Poverty Premium?. Fair by Design. [Online]. Available at: <https://fairbydesign.com/povertypremium/>. [Accessed 01/01/22].
- <sup>14</sup> DWP, 2022. Income-related benefits: estimates of take-up: financial year 2019 to 2020. Department for Work and Pensions. [Online]. Available at: <https://www.gov.uk/government/statistics/income-related-benefits-estimates-of-take-up-financial-year-2019-to-2020>. [Accessed 25/09/22].
- <sup>15</sup> Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].
- <sup>16</sup> Ofgem, 2019. Consumer Survey 2019: Consumer Engagement Survey Tables – Table 637. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/publications/consumer-survey-2019>. [Accessed 07/10/21]. Pg36.
- <sup>17</sup> BEIS, 2022. Review of Electricity Market Arrangements. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1098100/review-electricity-market-arrangements.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1098100/review-electricity-market-arrangements.pdf). [Accessed 25/09/22]. Pg15-16.
- <sup>18</sup> BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 25/09/22]. Table 13.
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- <sup>20</sup> EEIG, 2022. Energy Security Starts At Home. Energy Efficiency Infrastructure Group. [Online]. Available at: [https://www.theeeig.co.uk/media/1131/eeig\\_invest-to-save-06-22-03.pdf](https://www.theeeig.co.uk/media/1131/eeig_invest-to-save-06-22-03.pdf). [Accessed 25/09/22]. Pg2.
- <sup>21</sup> Online and CATI survey conducted by Opinium on behalf of Age UK between 2nd – 20<sup>th</sup> September 2022. Sample of 1402 older adults (60+) in Great Britain, weighted to be nationally representative.
- <sup>22</sup> BEIS, 2022. Review of Electricity Market Arrangements. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1098100/review-electricity-market-arrangements.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1098100/review-electricity-market-arrangements.pdf). [Accessed 25/09/22]. Pg15-16.
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- <sup>24</sup> In this case defined as never having switched energy supplier. Ofgem, 2019. Consumer Survey 2019: Consumer Engagement Survey Tables – Table 637. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/publications/consumer-survey-2019>. [Accessed 07/10/21].
- <sup>25</sup> Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].
- <sup>26</sup> Ofgem Consumer Survey, 2019. Cited in: BEIS, 2021. Energy Retail Market Strategy for the 2020s. Department for Business, Energy and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005307/energy-retail-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005307/energy-retail-strategy.pdf). [Accessed 14/10/21].
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- <sup>29</sup> Citizens Advice, 2017. *Smart support: Support for vulnerable consumers in the smart meter roll-out*. Citizens Advice.
- <sup>30</sup> NEA, 2021. Smart Prepay: Benefits, Challenges, Solutions. National Energy Action. [Online]. Available at: <https://www.nea.org.uk/wp-content/uploads/2021/06/Smart-Prepay-Full-Report.pdf>. [Accessed 14/10/21].
- <sup>31</sup> Online survey conducted by Opinium on behalf of Age UK between 3<sup>rd</sup> and 8<sup>th</sup> December 2021. Sample of 2,000 UK adults (18+), weighted to be nationally representative of age, gender, region and social grade.
- <sup>32</sup> Online survey conducted by Opinium on behalf of Age UK between 3<sup>rd</sup> and 8<sup>th</sup> December 2021. Sample of 2,000 UK adults (18+), weighted to be nationally representative of age, gender, region and social grade.
- <sup>33</sup> The question asked in the survey was: 'The majority of UK homes currently have a fossil fuel boiler (i.e. gas, oil, LPG) to heat water. Fossil fuels produce carbon dioxide. Which of the following best describes your views on phasing out fossil fuel boilers over time, and replacing them with new electric heating systems as a way to help reduce the UK's carbon dioxide emissions?' with the following answer categories:
- In favour of phasing out fossil fuel boilers
  - In favour of phasing out fossil fuel boilers – as long as the cost of installation is similar to a new fossil fuel boiler
  - Against phasing out fossil fuel boilers
  - N/A – I don't have an opinion on this issue
  - Don't know
- <sup>34</sup> BEIS, 2022. Review of Electricity Market Arrangements. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1098100/review-electricity-market-arrangements.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1098100/review-electricity-market-arrangements.pdf). [Accessed 25/09/22]. Pg15-16.
- <sup>35</sup> IfG, 2022. Electricity market. Institute for Government. Available at: <https://www.instituteforgovernment.org.uk/explainers/electricity-market>. [Accessed 02/10/22].
- <sup>36</sup> IfG, 2022. Electricity market. Institute for Government. Available at: <https://www.instituteforgovernment.org.uk/explainers/electricity-market>. [Accessed 02/10/22].
- <sup>37</sup> BEIS, 2022. Fuel Mix Disclosure Table. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1095492/fuel-mix-disclosure-august-2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1095492/fuel-mix-disclosure-august-2022.pdf). [Accessed 02/10/22]. Pg2.