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Fuel Bank Foundation

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Dear Heating oil @ CMA team,

At Fuel Bank Foundation, we support people who struggle to prepay for their energy. They might use a prepayment meter for their gas or electricity, or they may struggle to pay in advance for a delivery of oil or coal if they are not connected to the gas grid. The issue that they have in common is that, without our support, they would not have the ability to heat their homes, cook a hot meal or take a shower.

We were established ten years ago and, in that time, have supported over 2.3 million people right across the UK.

Originally, we focussed on emergency interventions to top up prepayment gas and electricity meters but then quickly realised that people who are not connected to the gas grid are also required to pay in advance for a delivery of fuel. And the sums involved to do so are substantial, which we know can cause certain households grave difficulties.

We work with a network of partners who refer people to us when they are in need of an oil delivery but don't have the funds to pay for it. We verify their circumstances to ensure that we provide support to people who are genuinely struggling, are in crisis and would not be able to get a delivery without our support.

Since January 2021, we have paid for 1431 deliveries of oil across the UK and 420 deliveries of LPG/gas and so have amassed an extensive amount of knowledge about the experiences of households living off the gas grid.

We conduct regular research with our clients, and their lived experience informs our policy positions. For many years now we have called for better consumer protections and a degree of regulation in the domestic heating oil market as we have heard first hand from our clients the detriment that they can suffer. For example, although some suppliers offer monthly pay-in-advance budget plans, these can restrict the consumer's ability to go to the market for a competitive deal. But many suppliers don't even offer

this option, and the full cost must be paid upfront which is often challenging for consumers on a fixed, low income. Also, in the absence of a Price Cap (as is found in the gas and electricity markets) any price shocks, such as we are currently experiencing, are felt immediately by consumers. Low-income households (without any financial resilience to protect them) are hit hard and, for many, their only alternative is to go without.

Since the beginning of the conflict in the Middle East, we have seen almost a doubling of the price we pay for oil for our clients from 66.3p/litre to £1.23/litre. In February this year, the average cost of a delivery was £389.90, whereas in March it was £643.00. At the same time, we have seen a marked increase in demand for our support - for example, we arranged and paid for 111 deliveries in March this year, compared to 42 in March of the previous year. Whilst we have seen prices rise in recent weeks, we are unable to establish whether this is a genuine reflection of the increase in costs faced by suppliers and so we are very pleased to see that you are investigating this.

We have also seen evidence of cancelled deliveries or the imposition of minimum or maximum delivery amounts, where no such limits had applied before. For example, some aggregator sites were saying that there was no oil available, other than at around £3 per litre for a 200l delivery, whereas a month ago larger volumes were on sale at 60p per litre.

Whilst we acknowledge and welcome the recent announcement of the Government's financial support to those households living off the gas grid, we are worried that it will prove to be insufficient in the long run, such is the extent of the increase in prices.

This is the story of one of our clients prior to the recent price increases:

Mrs B lives with her husband, her 11-year-old son and her 3-year-old step-grandson in Wales. Their house has oil heating. When they couldn't afford to pay for oil, the house was cold and uncomfortable and Mrs B explained how, *'I made them all wear snuggies when they came home from school, and I made them put their pyjamas on and bed socks.'* Mrs B described gaining support through our Heat Fund as making a *'big difference...it was better because I wasn't stressed over where was I going to buy the next oil from, because you have to buy it in bulk and you have to pay for it there and then and I was thinking oh my God how am I going to do this?'*

We can only imagine how she and her family will struggle the next time she needs an oil delivery.

Given our extensive experience of ordering oil for low income, often vulnerable, households, please do get in touch if you would like to discuss any of the information

we have provided in greater detail. We very much look forward to seeing the results of your work

Matthew Cole
CEO, Fuel Bank Foundation.