

Evidence Ofgem Consultation: Energy Consumer Outcomes – Proposed Implementation

Response from: G15 Residents' Group

Date: 28 July 2026

Lead G15RG member name: Michael Verrrier

Contact email: enquiries@G15Residents.co.uk

About the G15 Residents' Group

The G15 Residents' Group (G15RG) represents residents living in around 900,000 homes owned and managed by London's largest housing associations. Our members bring lived experience from across tenures, including social rent, shared ownership and leasehold homes, alongside extensive experience of resident leadership, governance, scrutiny and strategic decision-making.

Our evidence draws upon:

- The lived experiences of residents across the G15 organisations
- Engagement with resident group nationwide through our Social Housing Innovation Fund programme;
- Our work with regulators and government departments
- G15RG's consultation responses:
 - [Are London's Homes ready for a Heatwave](#)
 - [London's Housing Plan: Housing standards and planning reform](#)

Introduction

The G15 Residents' Group welcomes Ofgem's proposed move towards an outcomes-based approach to regulation, focused on the real experiences and outcomes consumers receive rather than simply compliance with prescriptive rules. We support Ofgem's ambition to strengthen monitoring of consumer experience, improve accountability and create a regulatory framework that encourages innovation while maintaining strong consumer protections.

However, we believe that good energy consumer outcomes cannot be viewed solely through the relationship between a supplier and a consumer. For many residents, particularly those living in social housing, the outcomes that matter most are shaped by the interaction between energy systems, housing quality, building design and the ability of a home to remain safe, comfortable and affordable throughout the year.

As Ofgem develops its monitoring framework and implementation approach, we encourage a broader understanding of consumer outcomes that reflects residents' lived experience and the realities of climate change, fuel poverty and housing quality.

Email: enquiries@G15Residents.co.uk

Consumer Outcomes Should Reflect Lived Experience

We welcome Ofgem's focus on monitoring real-world consumer experience and outcomes. From a resident perspective, success is not simply whether a bill is accurate or a complaint is resolved. Success is whether households can:

- Maintain a safe and comfortable temperature throughout the year.
- Afford the energy they need without experiencing financial hardship.
- Understand and effectively use new technologies.
- Feel confident that their home supports their health and wellbeing.
- Remain resilient during extreme weather events.

Many residents tell us that their energy costs are driven as much by the condition and design of their home as by the price of energy itself. A household living in a poorly ventilated, overheating or inefficient home can face significantly higher costs regardless of supplier performance.

We therefore encourage Ofgem to recognise that consumer outcomes are closely connected to the wider housing environment in which energy is consumed.

Affordability Must Include Climate Resilience

The consultation places significant emphasis on affordability and fair value. We strongly support this.

However, affordability should not be defined solely as the price consumers pay for energy. It should also consider the amount of energy households must consume to remain healthy and safe.

Historically, energy affordability discussions have focused primarily on keeping homes warm during winter. Increasingly, residents are telling us that the challenge is also keeping homes cool during prolonged periods of extreme heat.

Research has found that around one in six babies are living in homes that overheat during hot weather, while data from the UK Health Security Agency suggests that heatwaves in May and June resulted in approximately 2,700 excess deaths across England and Wales. Trends that demonstrate that overheating is becoming a serious consumer, public health and housing issue rather than simply a comfort issue.¹

¹ [National Housing Federation - One in six babies living in overheated homes](#)
[May and June heatwaves killed about 2,700 people in England and Wales, data suggests | Extreme heat | The Guardian](#)
[UK Health Security Agency](#)

For many residents, particularly older people, disabled residents, individuals with long-term health conditions and families with young children, cooling is becoming an unavoidable household expense rather than a discretionary one.

As climate change increases the frequency and intensity of heatwaves, future definitions of affordability should recognise:

- The growing cost of cooling homes.
- Additional energy requirements linked to health needs.
- The disproportionate impact of extreme temperatures on vulnerable households.
- The interaction between building design and energy consumption.

Outcomes-Based Regulation Should Consider Housing Performance

The G15 Residents' Group has consistently highlighted the relationship between housing quality, energy use, health outcomes and affordability.

In our previous submissions on heat resilience and housing standards, we argued that well-designed homes can:

- Reduce energy demand.
- Support physical and mental wellbeing.
- Reduce health inequalities.
- Improve household resilience.
- Lower pressure on health and care services.

Poorly designed homes can have the opposite effect.

Residents frequently tell us that issues such as poor ventilation, inadequate shading, damp, condensation and overheating increase both energy usage and living costs.

While we recognise that Ofgem does not regulate housing standards, we believe outcomes-based regulation should acknowledge the role housing plays in shaping consumer energy outcomes.

We therefore encourage Ofgem to work closely with:

- Government departments.
- Housing associations.
- Local authorities.
- Developers.
- Consumer bodies.
- Housing regulators.

A joined-up approach will be essential if consumer outcomes are to reflect the real-world experiences of households.

Vulnerability and Additional Support

We strongly support Ofgem's focus on vulnerability and inclusive consumer outcomes.

Particular consideration should be given to:

- Disabled residents.
- Older people.
- People living with long-term health conditions.
- Families with young children.
- Residents with mental health needs.
- Residents with limited digital access or digital confidence.

These groups often require higher levels of energy consumption as a necessity rather than a choice. Consumer outcome measures should recognise that higher consumption does not necessarily indicate wasteful use but may reflect legitimate health, accessibility or care needs. Any future monitoring framework should seek to understand whether these consumers are able to maintain a safe living environment without financial hardship.

Monitoring Outcomes Beyond Supplier Interactions

We welcome Ofgem's proposed focus on monitoring real-world consumer experience.

We encourage Ofgem to broaden the evidence used to assess outcomes.

Current measures often focus on:

- Billing accuracy.
- Complaint levels.
- Contact centre performance.
- Supplier responsiveness.

While these remain important, they do not always capture residents' experience of whether energy services are delivering meaningful benefits.

We recommend incorporating evidence relating to:

- Household comfort and thermal wellbeing.
- Experiences of overheating.
- Ability to maintain affordable warmth in winter.

- Energy-related financial stress.
- Consumer confidence in new technologies.
- Experiences of consumers in vulnerable situations.
- Long-term impacts on health and wellbeing.

Greater use of qualitative evidence and lived experience would strengthen Ofgem's understanding of whether outcomes are genuinely being achieved.

Supporting the Transition to Net Zero

The transition to a low-carbon energy system presents a significant opportunity to improve consumer outcomes, provided residents remain at the centre of decision-making.

We would particularly welcome Ofgem encouraging:

- Homes that remain affordable to heat in winter and comfortable during increasingly hot summers.
- Greater adoption of low-carbon technologies, including heat pumps and appropriate cooling-enabled solutions.
- Better consumer understanding of insulation, ventilation, shading and energy use.
- Improved information about the long-term financial and health benefits of energy-efficient homes.
- Stronger collaboration between the housing and energy sectors.
- Improved evidence linking energy efficiency measures to reduced fuel poverty, improved health and lower demand on health and care services.

Conclusion

The G15 Residents' Group supports Ofgem's ambition to create an outcomes-based regulatory framework focused on real consumer experience.

However, we encourage Ofgem to recognise that the outcomes consumers receive are influenced not only by energy suppliers but also by the homes in which energy is used.

For social housing residents, good consumer outcomes mean:

- Affordable warmth in winter.
- Protection from overheating in summer.
- Homes that are resilient to future climate risks.
- Fair and accessible energy services.
- Improved health, wellbeing and financial resilience.

We believe Ofgem's outcomes-based approach provides an important opportunity to better understand, measure and improve the experiences that matter most to consumers. To succeed, the framework must be informed by the realities of people's daily lives, recognising that affordability, comfort, health and resilience are closely connected to the homes in which energy is used.

The G15 Residents' Group would welcome further engagement with Ofgem to ensure that resident experience and lived expertise help shape the development, implementation and evaluation of outcomes-based regulation. By working in partnership with consumers, housing providers and community organisations, Ofgem can support a more sustainable, affordable and equitable energy system that delivers meaningful outcomes for all consumers.

The G15 Residents' Group