ALONE Submission to CRU Call for Evidence on Protecting and Supporting Customers Facing Sustained High Energy Prices

June 2026

About ALONE

ALONE is a national organisation that supports older people to age happily at home or in their local community.

Last year, we supported over 46,500 older people across our services. As we moved into the final months of last year, financial distress among the people we support became increasingly pronounced. Many of the older people we support with are living on fixed incomes, are struggling with the cost of living, and face barriers in accessing essential services. They often live in older, poorly insulated homes, and are reliant on solid fuel/oil, meaning they require more energy to stay warm while having the least capacity to absorb energy price increases.

ALONE has established partnerships with energy companies including Electric Ireland, Bord Gais Energy, SSE Airtricity, Energia, and Prepay Power Ireland, and as part of our Winter and Weather Response programme, we assist older people to access supplier hardship funds, register as vulnerable customers, and engage directly with suppliers to establish and maintain arrears repayment plans. ALONE also supports older people to access financial benefits such as the Fuel Allowance throughout the year; to access retrofitting supports such as SEAI grants and the housing aid for older person’s grant; and to access practical supports, such as medication or grocery delivery during weather warnings or periods of extreme weather. Additionally, ALONE’s Community Impact Network provide free, 2-hour in-person energy workshops to older people across the country. Participants learn how to understand their energy bill, compare tariffs, reduce costs safely, and communicate confidently with energy providers. Practical energy-saving tips and guidance on using online tools are also included.

Introduction

We welcome the opportunity to respond to this Call for Evidence on *Protecting and Supporting Customers Facing Sustained High Energy Prices*. With Ireland's population aged 65 and over projected to exceed 1 million by 2030, older people are not a marginal group but an increasingly central part of the energy market, making it essential that their needs are fully reflected in regulatory protections.

It is our experience that high energy costs are having a disproportionate impact on older people, contributing to increased fuel poverty and forcing many to make difficult trade-offs between essential needs such as heating and food: a reality often described as 'heat or eat'. The human stories behind these statistics is stark[1]:

"Because I am disabled, I cannot move around to keep myself warm, so I cannot avoid putting the heating on in the winter. And where I live is a particularly cold house. My electricity bills are astronomical. I had to seek help from the SVP. I know the dangers of cold for old people so I would rather cut down on food than heating."
"...can't put on the central heating... often I'm often cold in the house. Can't buy the same amount of food as I had been buying"

Poverty among older people living alone is not a risk but a lived reality. CSO SILC data[2] confirms that older people living alone are twice as likely to live below the poverty line.

Older people face structural vulnerability to energy price increases. Although energy poverty is difficult to measure, some metrics show that households with someone aged 65+ are 1.8 times more likely to experience energy poverty[3]. Many older people live in inefficient homes (25–38% BER E–G [4]), meaning they use more energy to achieve less warmth. The health consequences are severe: energy poverty increases the risk of illness and death due to cold homes and GP visits for respiratory infections rise by up to 19% for every 1°C drop in outdoor temperatures below 5°C[5].

ALONE's End of Year Report for 2025[6] further highlights the scale and nature of financial challenges experienced by older people. Financial difficulties accounted for approximately 21% of reported concerns from older people but increased sharply across the year. Fuel Allowance was the most frequently cited concern, highlighting the growing impact of rising energy costs, and the extent to which older people must rely on State supports to meet

[1] All quotes throughout are from ALONE's Cost of Living Survey 2026
[2] Survey on Income and Living Conditions (SILC) - CSO - Central Statistics Office
[3] ESRI Working Paper, May 2023 https://www.esri.ie/system/files/publications/WP751_0.pdf
[4] Central Statistics Office, 2021, *Domestic Building Energy Ratings from a Social Perspective 2016.* [online] Available at Domestic Building Energy Ratings from a Social Perspective 2016 - CSO - Central Statistics Office
[5] https://www.lenus.ie/bitstream/handle/10147/634784/Rapid%20report%20on%20energy%20poverty%20ADPHLG%2019%20Oct%202022.pdf?sequence=1&isAllowed=y
[6] ALONE ECC End of Year Report 2025 - ALONE

basic energy needs. Our annual cost-of-living survey, sent to 3,885 older people in all 26 counties (17.5% response rate), revealed three-quarters of older people reported that their lives had been impacted by the cost-of-living crisis (up from 44% in 2025). A growing number of older people (almost 6 in 10) report difficulty paying bills (up from 37% in 2025) with heating, food, and household maintenance, the areas of greatest concern. Notably, 45% reported going without adequate heating to reduce energy costs (up from 40% in 2025).

Our submission focuses on ensuring that the regulatory framework reflects the needs, vulnerabilities, and lived experiences of older people. ALONE recommends:

- Improving energy market data and transparency
- Making tariffs clearer and easier to compare
- Strengthening protections for vulnerable customers
- Simplifying and improving energy bills
- Reducing energy poverty by preventing accumulation of debt
- Improving engagement and support for customers in debt
- Protecting customers at contract end and account closure
- Investing in targeted supports to prevent energy poverty

Q1. Are there additional data points or metrics beyond those already captured that you believe would be useful and beneficial to customers that should be incorporated into the retail market monitoring obligations of suppliers and/or network operators?

Current reporting does not show the full picture of the energy challenges faced by older people, especially those living alone. Many people cope by cutting back on heating or electricity to avoid falling into debt. ALONE's Cost of Living Survey (2026) shows this clearly: 45% of older people said they had gone without enough heating to keep costs down. This means that official figures on arrears do not reflect the true level of hardship.

"I never turn my heating on."

ALONE recommends:

The CRU strengthen reporting requirements to ensure that vulnerability and hardship are captured more fully across the energy retail market. Specifically, this should include enhanced reporting on key indicators of financial hardship, customer engagement, and access to supports across the retail market, in line with approaches taken by regulators such as Ofgem in Great Britain[7], which capture more detailed data on customer debt, repayment engagement, and vulnerability.

[7] For example, Ofgem publishes detailed data on average debt levels, customers with and without repayment arrangements, and the proportion of customers repaying debt, as well as data on the use of prepayment

In addition, the CRU should carry out additional consumer research to enable better design of consumer supports and interventions, going beyond supplier-reported data. This could include the collection and annual publication of the following metrics, disaggregated by age and household type (e.g. living alone) wherever possible:

- **Debt and repayment:** While arrears levels are already reported on, data on repayment plan uptake, average duration, and completion rates are not currently published and would provide a more complete picture of financial hardship. While arrears levels and some repayment plan outcomes are reported on, more detailed and regularly published data on repayment plan uptake, how long plans typically last, how customers engage with them, and outcomes by age group would provide a more complete picture of financial hardship

- **Priority and Special Services Registers:** Supplier-level data on the number of customers registered on each scheme is not current registered in a disaggregated form. Publishing this would enable the CRU to assess whether eligible customers are being identified and supported consistently.

- **Switching:** Switching rates by channel (online, phone, in person) and demographics

- **PAYG self-disconnection rates:** The rate at which customers self-disconnect due to inability to top up is a key but currently underreported indicator of financial hardship.

- **Supplier accessibility:** Metrics including volume of calls, average call wait times, abandoned calls and primary contact methods (implemented by the Central Bank for retail banks in 2022[8])

- **Out-of-contact tariffs:** The number of customers on out-of-contract tariffs, who are typically among the most vulnerable.

Annual publication of these metrics would improve transparency, enable supplier comparison, and support targeted regulatory action to address poor outcomes for older and at-risk customers.

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meters for debt repayment. Ofgem also places a strong emphasis on improved identification of vulnerable customers, including monitoring of Priority Services Register uptake across suppliers. See: Consumer Vulnerability Strategy and Debt and arrears indicators | Ofgem

[8] 'Central Bank requires improvements to retail banks' customer support phone lines' (2022). Available at: https://www.centralbank.ie/news/article/press-release-central-bank-requires-improvements-to-banks-support-phone-lines-18-February-2022

"Cost of heating is a big worry. Proper food is a priority, but I would put heating first, before food."

Q2. Do you believe that customers are being provided with sufficient information on their tariff (and consequent likely bill levels) at sign-up? AND

Q3. Do you believe that customers are sufficiently informed of their likely bill levels at sign-up or are they confused by offers which are not energy related at sign-up (e.g. cashback offers/non-cash vouchers)?

It can be difficult for many people to easily understand information when signing up to an energy plan. Tariffs can be complex and offers such as cashback, or vouchers can make it harder to understand the true cost of energy. The CRU has recognised that these types of offers can disguise the real price[9], which is a particular concern for people with lower literacy and numeracy skills.

While price comparison websites exist, they often require internet access and, in some cases, the ability to upload energy usage data. This creates a barrier for many older people. CSO data[10] shows that 9% of people aged 60–74 and 34% of those aged 75 and over have never used the internet, leaving them without easy access to independent advice on tariffs.

Awareness of the Priority Services Register and Special Services Register also remains low. Many older people do not know they are entitled to these supports and are not informed about them when signing up, meaning they miss out on important protections.

ALONE recommends:

- All suppliers should provide a standardised one-page summary at sign-up (similar to Ofgem's Tariff Information Label[11]) showing the full yearly cost in clear figures, including unit rates, standing charges, how long any discount lasts, what the price will be after the discount ends, and any exit fees. Total yearly cost should always be more visible than cashback or voucher offers.

- Suppliers should routinely inform all customers about the Priority Services Register and Special Services Register at sign-up and explain the benefits clearly.

[9] CRU202658 Call for Evidence on Protecting and Supporting Customers Facing Sustained High Energy Prices_0.pdf
[10] Frequency of Internet Usage Internet Coverage and Usage in Ireland 2025 - Central Statistics Office
[11] Tariff Information Label Template 1 | Ofgem

Q4. Do you believe the current requirements for information to be included on customers' bills in the context of arrears is appropriate and beneficial to customers? Do you think some requirements could be removed or others added? AND

Q5. Do you have any other general feedback with regards to billing? For example any other information that should be included/excluded or prominent on the front etc?

Bills are often complex and hard to understand[12]. From ALONE's experience in running energy advice workshops for older people, many people struggle to read bills due to small print or confusing layouts.

There is also a lack of clarity around meter readings. It is not always clear whether a bill is based on an estimate or an actual reading[13], and when a corrected bill arrives, it can be unexpectedly high. For those on fixed incomes, these back-bills can be very difficult to manage.

Many older people are also unaware that they may be on a more expensive out-of-contract tariff or that a cheaper option is available from their current supplier.

ALONE recommends:

- Bills should include clear signposting to trusted, independent organisations that provide support to customers experiencing difficulty, such as ALONE, MABS, and SVP. This approach is consistent with the approach of the European STEP programme[14] which sought to connect energy poor consumers with consumer groups and frontline organisations that can provide advice and support. Prominent signposting to trusted support organisations may encourage earlier engagement, improve awareness of available assistance, reduce debt escalation and help consumers access appropriate supports before their situation worsens.
- The CRU should introduce a clear standard for the presentation of numerical information on bills and other customer communications. The Plain Numbers approach[15] has been shown to greatly improve understanding and should be applied to bills, arrears notices, and end-of-contract messages. Bills should be simpler and easier to read, with key information clearly laid out. They should use large print, plain English[16], and include a simple comparison with the same period last year.

[12] Research shows that simplifying the language used in energy bills would appeal to the majority of bill-payers, with almost two-thirds of bill payers agreeing that the language used in energy bills needed to be more accessible. From: Energy bills and literacy: A survey of UK adults | National Literacy Trust

[13] While most energy bills indicate whether meter readings are actual, customer-provided, or estimated, some use abbreviations such as "A", "C", or "E" beside the meter reading. While explanations of these abbreviations are typically included elsewhere on the bill, they may appear in small print or in a separate section, meaning that it is not always immediately clear to customers - particularly older people - whether a bill is based on an estimated or actual reading, or what the implications of this may be for future bills.

[14] STEP - Solutions to Tackle Energy Poverty | BEUC

[15] For more information see: plainnumbers.org.uk

[16] Plain English - NALA

Design innovation in other jurisdictions offers a useful model: for example, in 2024, Greece introduced mandatory use of colour-coded 'transparency marks' on electricity products, which give information about the product at a glance[17]. In addition, winter bills should include a simple insert signposting supports such as the Fuel Allowance and Household Benefits Package.

- All customers should be able to receive a paper bill without additional cost. The Commission for Communications Regulation (ComReg) already ensures that telecoms customers can request a paper bill at no cost from their provider if they cannot reasonably access or use an electronic bill, and/or have a disability.

[17] For more information, see: https://erranet.org/wp-content/uploads/2024/03/8_CS_Fragoudaki_RAAEYGreece_CommunicationWorkshop_Apr2024.pdf ;

Q6. Why in your opinion is the number of customers on repayment plans here lower than elsewhere? Do you believe payment plans are useful for customers and if so what would you suggest to increase the number of customers on payment plans? AND

Q7. For customers on repayment plans already what measures do you think can be taken to reduce the number of repayment plans that are then broken by customers? AND

Q8. Do you think PAYG Financial Hardship meters should be further promoted to customers who need help meeting their bills or should alternative solutions such as repayment plans be promoted instead? AND

Q9. Are there any other debt repayment solutions you believe would be implementable and appropriate for customers in debt?

Repayment plans are an important way of helping people manage energy debt, but they are underused in Ireland.

ALONE believe there are several reasons for this:

- Many older people do not know that repayment plans are available or that they can ask for one.
- There can also be shame or fear around debt, particularly for people who have managed independently all their lives.
- Awareness of non-partisan support options is another barrier. For example, organisations such as ALONE and MABs can support engagement with suppliers to establish repayment plans, but many customers are not aware of this.

While PAYG (pay-as-you-go) meters can help some people manage spending, ALONE is concerned about their impact on older people and at-risk groups. Our experience shows that some people reduce their heating to avoid topping up, meaning they go cold rather than into debt. Rather than resolving the issue, PAYG meters enable it to be hidden, with no reporting at present on rates of self-disconnection.

> *"I don't use the heating as often as I should because it's too expensive and the house is very cold even with the heating on."*

ALONE recommends:

- Suppliers should proactively contact customers in debt about the availability of repayment plans. Plans should be based on what the person can afford, and flexible if circumstances change. Additional data on the take-up and success of repayment plans, as highlighted in response to earlier questions, would also support in designing interventions relating to repayment plans.

- Customers on the Vulnerable or Priority Services Register should be supported to access the cheapest suitable tariff from their supplier. Ensuring that those at risk are on the lowest available rate is one of the most effective ways to prevent debt building up in the first place.

- Energy suppliers should be required, as a condition of their licence or through regulatory requirements, to operate hardship and compassionate assistance funds to support customers in financial difficulty. While these schemes are open and accessible at present, such funds have opened and closed at various points in recent years. In ALONE's experience, availability of these funds via our organisations promotes engagement with suppliers and can support those in difficult situations to get back on track, as well as providing significant support and relief to older people and other customers who are struggling.

- A clear process should be in place for bereavement cases. Debt collection should be paused for a reasonable period (such as 6 weeks)[18], and suppliers should offer support to review the account.

"To save electricity I shower with cold water."

[18] Social welfare payments following a death: When someone who was getting a social welfare payment dies, their spouse, civil partner or cohabitant may get 6 weeks of this payment after the death.

Q10. Do you have any thoughts on how customers in debt engagement with their supplier may be more effectively promoted? AND

Q11. Do you believe that the current disconnection procedure is appropriate and sufficient or could it be changed or improved for a better outcome for customers?

Older people can face real barriers when trying to engage with their energy supplier, especially when they fall into debt. Automated phone systems can be difficult to use[19], long waiting times can discourage contact, and many people lack confidence in dealing with suppliers.

"Energy bills lead to anxiety and worry. My health means that I feel the cold terribly but cannot afford to have heating on so often I simply go to bed to be warm."

ALONE recommends:

- The protections available to engaging customers under the Energy Engage Code should be formalised within the regulatory framework and applied consistently across all suppliers. Suppliers should actively promote the Priority Services Register and Special Services Register through post *and* phone, so that all eligible customers are aware of and receive these protections.

- The CRU should set clear expectations, through regulatory guidance that supplier staff who deal with customers in debt should be trained to communicate in a way that reduces anxiety and focuses on finding a solution, including by making referrals to appropriate support services including MABS, SVP and ALONE.

[19] Research shows that automated phone systems ("phone trees" / IVR) are frequently frustrating and difficult to navigate – From: The UX of Phone-Tree Systems: 16 Usability Guidelines - NN/G

Q12. Do you believe the current Handbook requirements are sufficient in making customers aware they are approaching the end of their contract? AND

Q13. Beyond the current Handbook requirements on suppliers do you think further promotion on the importance of switching or renegotiating at the end of a contract is necessary? If so what would be the best way to ensure customers are aware of it? AND

Q14. Do you think the current process for receiving credit following account closure is sufficient?

Many customers, particularly older people, end up paying more than necessary when their energy contract ends. In 2025, 288,000 electricity customers and 89,000 gas customers moved onto a standard tariff instead of switching or renegotiating[20]. UK evidence shows that older people are more likely to be in this group, meaning they often pay more simply by staying with their supplier.[21]

When a contract ends, customers are usually moved onto a higher default rate if no action is taken. For older people on fixed incomes, this increase can be significant and unless properly communicated, it may not be immediately realised.

Switching supplier or finding a better deal can also be difficult. Many of the cheapest offers are only available online, but this excludes many older people who do not use the Internet. In addition, a CRU survey found that 57% of customers have difficulty comparing offers[22], and complexity/lack of clarity/hassle was the second most common reason for not switching according to 2022 research[23].

There are also problems when accounts close. Refunds can be unclear or delayed, and many older people may not realise they are owed money. This is especially an issue where someone moves into residential care or after a bereavement, where balances may go unclaimed.

ALONE recommends:

- The cost of doing nothing should be clearly explained in plain language. Customers on the Priority Services Register or Special Services Register who do not respond should be moved to the best available standard rate, not a higher default rate.
- Customers should be clearly told if they are owed money, how much they are owed, and how it will be paid. Refunds should be issued automatically within a specified

[20] CRU202658 Call for Evidence on Protecting and Supporting Customers Facing Sustained High Energy Prices_0.pdf
[21] While age-disaggregated data on switching is not currently collected or published in Ireland, evidence from other jurisdictions indicates *that engagement in the energy market -which covers activities such as comparing and switching tariffs - is among the lowest for the 65+ age group, with participation noticeably declining since 2020.* From: Consumer Survey 2021 - Engagement Report v1_011021_ICUO
[22] CRU2022986-CRU-Consumer-and-Business-Survey-Report-2022.pdf
[23] CRU2022986-CRU-Consumer-and-Business-Survey-Report-2022.pdf

period (i.e. 10 working days) when an account closes, without the customer having to ask.

- In the case of bereavement, there should be a simple and clear process for family members or representatives to claim any credit.

Q15. Are there any other measures or suggestions that you believe should be considered for Irish consumers?

Training should be provided for frontline community and NGO workers on energy poverty and the supports available to customers in debt. Many older people will first raise concerns about their energy bills with a community worker or volunteer rather than contacting their supplier directly. Ensuring that these workers know what help is available is practical and effective and helps reach older people early, following the example set by Solutions to Tackle Energy Poverty (STEP) in the EU.

Sustained high energy costs are not a short-term issue for older people; they are a long-term structural problem. Many older people are living alone, on fixed incomes, in less efficient homes, and face barriers to accessing supports. National data shows they have at-risk poverty rates twice the national average. Social isolation and digital exclusion can make these challenges even worse. Addressing this requires both regulatory changes and broader Government action to improve direct financial supports such as the Fuel Allowance and Household Benefits Package; to improve provision of retrofitting grants; and to provide access to community energy supports.

"Proper food is a priority, but I would put heating first, before food."

Conclusion

Older people are not a minority group at the edges of the energy market; they are one of the largest demographic groups in the country, and as our population ages, this cohort will continue to grow. Fixed incomes, poor home energy efficiency, digital exclusion, and barriers to engagement mean that sustained high energy prices fall on older people with a force that current regulatory protections do not fully reflect.

ALONE urges the CRU to use this Call for Evidence as an opportunity to place those who are most at risk at the centre of its regulatory approach through better data, clear communications, stronger protections, and partnership with organisations like ALONE that work with older people every day.

We welcome ongoing and regular engagement with the CRU and are happy to provide additional evidence from our frontline work to support the development of effective measures that reflect the lived experience of older people in Ireland.