



Ofcom
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SENT BY EMAIL ONLY: debt.review@ofcom.org.uk

30 September 2021

Dear Sirs

Re: Call for inputs: Review of measures to protect people in debt or at risk of disconnection

Thank you for providing the opportunity for stakeholders to communicate their initial views on the need to review the existing measures to protect people in debt or at risk of disconnection.

Verastar Ltd (“Verastar” or “we”) supplies multiple services including gas, electricity, water, insurance and telecoms to over 160,000 microbusinesses. We are regulated by Ofcom, Ofgem, Ofwat, WICS and the FCA. Our experience provides valuable insight into the supply of such services to microbusinesses.

Whilst we will always be supportive of measures to ensure that the most vulnerable customers are treated fairly, we don’t consider that an assessment of harm would apply equally to residential consumers and small businesses for the following reasons:

- Vulnerability is less likely to be an issue for business customers;
- It is established law that businesses (whatever the size) should be treated differently to consumers and, accordingly, business to business contracts are treated differently to business to consumer contracts;
- Businesses are, in the main, carrying on a business for profit and are more likely to be aware of the potential impact of non-payment.

We therefore believe that whilst there could be some standard measures set out in an amended guide on treating vulnerable customers fairly, guidance should differentiate between residential consumers and business customers. This approach has already been adopted in the energy market and is working effectively.

Should you wish to discuss any of our comments in relation to this call for inputs, please don’t hesitate to contact me at emma.groves@verastar.co.uk.

Yours faithfully

Emma Groves

Emma Groves
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Verastar Limited