



**CONSUMERS
INTERNATIONAL**

COMING TOGETHER
FOR CHANGE



GLOBAL BLUEPRINT FOR INCLUSIVE ENERGY SERVICES

Recommendations
for the Italian Marketplace

ABOUT CONSUMERS INTERNATIONAL

Consumers International is the membership organisation for consumer groups around the world. We believe in a world where everyone has access to safe and sustainable goods and services.

We bring together over 200 member organisations in 115 countries to empower and champion the rights of consumers everywhere. We are their voice in international policy-making forums and the global marketplace to ensure they are treated safely, fairly and honestly.

We are resolutely independent, unconstrained by political or business interests. We work in partnership and exercise our influence with integrity, tenacity and passion to deliver tangible results.



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1. DRIVING INCLUSIVE ENERGY SERVICES GLOBALLY

At Consumers International, we champion consumer protection and empowerment in energy markets, and harness consumer power to drive a fast, fair and accountable transition to our clean energy future.

Affordable access to adequate energy services is crucial to upholding human rights and dignity, and is an essential consumer need enshrined in the United Nations Guidelines for Consumer Protection (see *Box 1 below*). Yet energy poverty affects more than 2 billion people globally¹. Consumers facing economic, health, social, or life-stage challenges, or living in remote locations, are among those most likely to struggle to access the energy they need.

United Nations Guidelines for Consumer Protection

Adopted by the UN in 1985 after a global campaign led by Consumers International, these Guidelines remain the international benchmark for consumer rights. They set core principles for fair, safe, and sustainable markets, guiding governments and businesses in protecting consumers in relation to 11 “legitimate needs” of consumers. Since 2015, “universal access to clean energy” has been recognised as one of the essential consumer services protected by these Guidelines. Coordinated by UN Trade and Development (UNCTAD), with ongoing leadership from Consumers International, they offer the foundation of consumer rights, protection and empowerment in the global marketplace.

Box 1- The United Nations Guidelines for Consumer Protection (UNGCP)

A strong body of knowledge around the challenges of energy poverty and energy affordability has been building over recent decades. Nevertheless, the gap between recognition and action remains large; at least 120 million households in advanced economies alone are still struggling with energy poverty².

Across countries, the consumer experience is similarly complex, shaped by age, gender, health, culture, income, housing conditions and location, and exacerbated by emerging challenges such as digital access, the rise of scams and more. And these conditions can change over time. If energy systems are to deliver for all consumers, we must move beyond one-size-fits-all models and suppliers in particular must invest in more inclusive, care-led service design.

1.1 AMBITION OF THE BLUEPRINT FOR INCLUSIVE ENERGY SERVICES

Consumers International launched the Blueprint for Inclusive Energy Services to address the problem of inequitable access to essential energy services, prioritising consumers in vulnerable situations, and to assist energy market players around the world in designing energy services both with and for those most in need.

1 IEA, *Strategies for Affordable and Fair Clean Energy Transitions*, 2024. IEA/OECD. Figure based on access to clean cooking in developing countries.

2 IEA, *Household Energy Affordability*, 2026. IEA/OECD.

We have identified an opportunity to accelerate change by encouraging greater engagement from the business community and to activate the powerful levers that energy suppliers possess to improve fairness and inclusion in energy services through their direct relationship with individual customers.

The main ambition of the Blueprint for Inclusive Energy Services project is to:

- Build dialogue and trust between local energy business and consumers
- Raise awareness of the biggest challenges faced by energy consumers with vulnerabilities
- Activate more inclusive energy solutions for consumers at both local and global levels

Each Blueprint report will explore the lived experience of a particular group of consumers experiencing energy vulnerability. This first report of the Blueprint for Inclusive Energy Services series focuses on the Italian energy market, and the experience of Italian consumers aged 75 and over with intersecting challenges.

Consumers International aims to replicate this enquiry, applying the Blueprint methodology to a series of focused dialogues with other high-risk groups in other energy markets. Over time, this programme of work will not only activate more inclusive energy solutions for consumers in those countries but will also generate a uniquely comparative consumer-level dataset on how inclusive energy services are experienced and defined across different countries.

The result will be a blueprint for action that can guide energy suppliers and other energy sector actors across the world through the wide-ranging opportunities to deliver fairer and more inclusive energy services to all consumers.



1.2. GLOBAL PROJECT DESIGN

Consumer-first lens

Consumers International is the only organisation to connect and represent the independent consumer voice globally. Informed by the experience of consumers everywhere, we draw on our wide network of stakeholders and partners from civil society, academia, government and business to foster cross-sectoral dialogue and collaboration in support of a people-centered energy transition. We engage the actors with the strongest levers for change, supporting them with our unique consumer insights, to co-create solutions which protect, empower, and engage ordinary consumers within the energy system.

Place-based sub-projects

Acknowledging the diversity of consumer experience, and the critical role that context plays, we designed a strongly place-based approach for the Blueprint project. We select a specific consumer group for whom energy challenges are most pressing and a country in which that group is prevalent. This allows us to explore in-depth the lived experience of real consumers, producing a detailed picture of the challenges they face and the tailored responses required.

Multi-stakeholder steering group

The Blueprint for Inclusive Energy Services brings together a unique combination of energy sector stakeholders in the research phase and in the Project Steering Group in each focus country. Each Steering Group is comprised of:

- local consumer advocacy groups
- key local energy-related non-governmental organisations (NGOs)
- key local energy supply businesses

Through frequent meetings with the Steering Group, we share the evidence we uncover and test it against the practical experience and expertise of the Steering Group members. This multi-stakeholder approach ensures a balanced and holistic perspective, combining an intimate understanding of consumer experience with sector-specific actors who hold customer engagement expertise, as well as the levers to make a difference fast. Consumers International guides an ongoing conversation to assess the evidence and discuss practical, locally solutions that the entire Steering Group can agree to support.

Consumer journey framing

Putting people at the centre of the energy transition requires understanding their experiences across the entire “energy consumer journey”³. Consumers International defines this journey as comprising five stages: knowledge and awareness; safe and affordable solutions; investment in technology; efficient, safe and effective energy use; and maintenance, repair and redress. By assessing consumer needs at each stage, and the extent to which these needs are met, we can then identify opportunities for improved consumer protection and empowerment to unlock the barriers to inclusive energy services.

Research and engagement approach

Taking consumer experience as our starting point, the first step is a broad research, engagement and listening process. Consumers International draws on its unique cross-sector network and the local insights held by our Members – consumer advocacy groups from 115 countries. In the target market, we collect views and evidence through interviews with local and global sector experts, local community interest groups, and by directly surveying local consumers experiencing vulnerabilities. We apply the consumer journey lens to interpret the insights gathered, mapping the key barriers that can prevent fair and affordable energy access throughout the consumer journey, to build a rich and personal picture of the consumer experience.

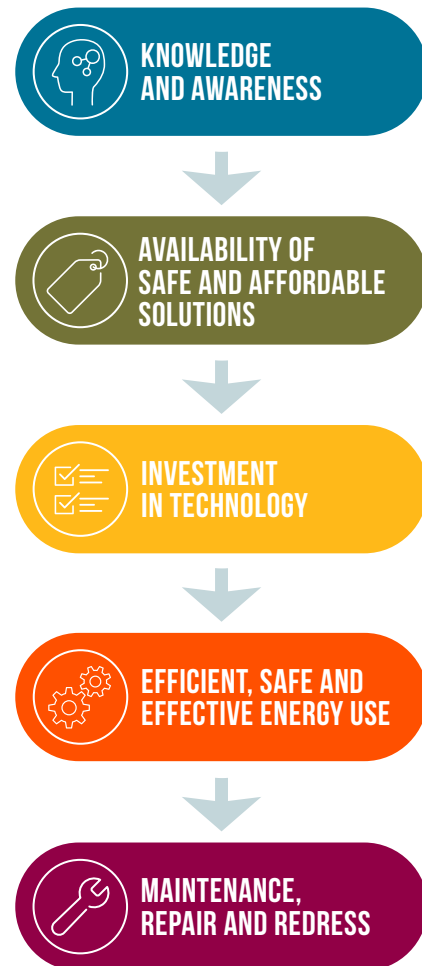


Figure 1 – The Energy Consumer Journey

³ Consumers International, [Consumer Protection and Empowerment for a Clean Energy Future](#), White Paper, 2023.

Blueprinting solutions

The challenges we have uncovered give rise to five categories of opportunity, which form the backbone of the Blueprint for Inclusive Energy Services, as set out in Figure 2 below.






Consumer Journey Stage	Opportunity for Inclusive Energy Service Solutions
 <p>KNOWLEDGE AND AWARENESS</p>	<p>Improve accessibility and communication: Design clear, empathetic and inclusive information and communication through multiple channels.</p>
 <p>AVAILABILITY OF SAFE AND AFFORDABLE SOLUTIONS</p>	<p>Boost availability of affordable options: Share trusted information about most suitable options and help customers with energy saving opportunities.</p>
 <p>INVESTMENT IN TECHNOLOGY</p>	<p>Support investment in electrification and innovation: Support targeted investment in electrification, innovative technologies, and business models that offer new ways to meet the needs of all households.</p>
 <p>EFFICIENT, SAFE AND EFFECTIVE ENERGY USE</p>	<p>Acknowledge day-to-day coping mechanisms: Develop solutions that address practical consumer challenges, putting consumer needs and wellbeing at the core of service design.</p>
 <p>MAINTENANCE, REPAIR AND REDRESS</p>	<p>Build customer confidence: Promote trust through robust consumer protection measures and transparent reporting systems.</p>

Figure 2: Five categories of opportunity

Our search for solutions is informed by a global scan for best practices from the energy sector and beyond, as well as in-depth conversations with those working inside businesses and engaging with customers at the front line of customer service.

We place 'inclusive design principles' at the heart of our Blueprint⁴. This supports solutions that prioritise a care-led approach, centred on consumers' lived experiences, ensuring products and services work for everyone, with trust, simplicity, and human connection as core traits.

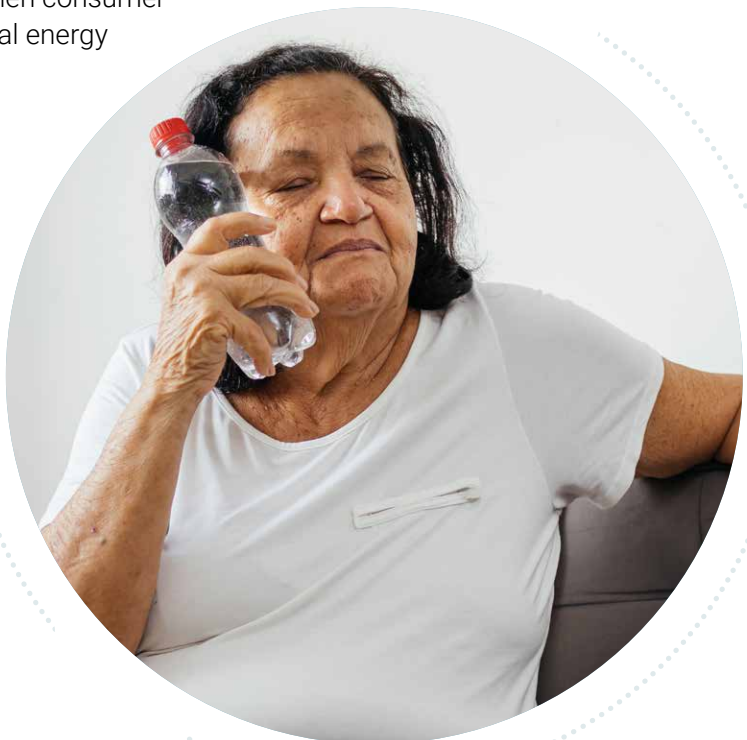
Recognising all actors – energy suppliers; civil society and consumer organisations; policy-makers and regulators – have a role to play and must work together to improve energy services and rebuild trust, each solution clearly defines the role of every actor involved.

Impact in-country

The 10 solutions emerging from the first Blueprint for Inclusive Energy Services report represent a comprehensive menu of actions available to key actors – including energy suppliers – seeking to enhance energy services for local consumers, within the framework of their commercial activities and customer relations.

There is also an opportunity to translate the Blueprint into an enduring sector framework setting out service-level objectives to encourage increased ambition among all energy market actors over time. Our hope is that the groundwork laid by the Blueprint for Inclusive Energy Services project will trigger an ongoing and collaborative discussion that can be championed by local actors long after our project is completed.

We are confident that doing so can strengthen consumer trust, demonstrate leadership, and align local energy markets with global best practice.



4 Read more: [Inclusive Design in Essential Services - Money Advice Trust and Fair By Design](#)

2. EXPLORING THE EXPERIENCE OF OLDER PEOPLE IN ITALY

The first pilot of the Blueprint for Inclusive Energy Services series focuses on the experience of an important and growing consumer group - consumers aged 75 and over with intersecting challenges. We chose to explore this in the context of the Italian energy market, where older consumers represent a large section of the market and where national energy transition goals, coupled with the European Union's citizens energy objectives, offer a timely opportunity to drive positive change.

2.1 SELECTING PROJECT FOCUS

A rapidly ageing population

The world is ageing fast. By 2050, one in six people will be over 65, with the sharpest growth in Asia and Europe⁵. While many older people are thriving, a large proportion face intersecting challenges which can compound risks to energy access.

Older people are more likely to spend more time at home in older, energy inefficient housing, and to face poorer health, all of which increases their energy needs to between 30-60% higher than younger groups. Lower incomes and a higher prevalence of physical challenges like poor eyesight, hearing and mobility can make accessing energy services harder.

Energy poverty affected approximately 2.4 million households in Italy in 2024⁶. As of 2025, nearly 40% of individuals aged 75 and over in Italy live alone, the majority of whom are women. Older women are not only more likely to live alone but also have lower pensions and fewer resources. Approximately 3.1 million Italians live with disabilities - around 5.2% of the population - nearly half⁷. Climate change adds further pressures: older adults are among the worst affected by heatwaves, which are becoming more frequent and intense across Europe. In the heatwave of 2023, over 12,700 heat-related deaths were recorded in Italy, the highest number in Europe.

An energy sector in transition

Italy's energy supply mix is evolving as the country works to increase electrification and reach its target for 70% renewable electricity by 2030. Despite the growth of renewable energy sources, natural gas and oil remain dominant, currently comprising nearly 70% of Italy's total energy supply. Household energy use is shaped by a strong reliance on gas – in 2023, natural gas accounted for approximately 46% of residential energy consumption while electricity represented about 22%⁸. Italy's current reliance on fossil fuels, on both supply and demand sides, exposes energy consumers to volatile international

5 United Nations Department of Economic and Social Affairs, Population Division (2022). World Population Prospects 2022: Summary of Results. UN DESA/POP/2022/TR/NO. 3 https://www.un.org/development/desa/pd/sites/www.un.org.development/desa/pd/files/wpp2022_summary_of_results.pdf

6 Italian Energy Poverty Observatory (OIPE). (2025). Povertà energetica in Italia nel 2024. Retrieved from https://oipeosservatorio.it/wp-content/uploads/2025/12/2025_PE_ITA_2024.pdf

7 ISTAT & ANSA. (2019, December 3). *Italy has 3.1 million disabled, 204,000 live alone*. ANSA English. https://www.ansa.it/english/news/2019/12/03/italy-has-3.1-mn-disabled-204000-live-alone-istat_1c5a0a1d-59aa-4d2a-99eb-8bb673f9fe6b.html

8 IEA. (n.d.). Italy: Energy mix and electricity share in final consumption. Retrieved September 30, 2025, from <https://www.iea.org/countries/italy>

prices, underscoring the opportunity presented by the energy transition to build greater national energy security and price stability.

July 2024 marked an important turning point in Italy's energy sector, with the formal liberalisation of the energy retail market and an end to regulated electricity tariffs. The interests of "vulnerable consumers" within the market are currently protected through the *Servizio di Maggior Tutela* (electricity) and *Servizio di tutela della vulnerabilità* (natural gas) and overseen by Italy's Regulatory Authority for Energy, Networks and Environment (ARERA) (see Box 2 below).

The **Regulatory Authority for Energy, Networks and Environment (ARERA)** is the independent regulatory authority responsible for ensuring the efficient operation and transparency of Italy's electricity, gas, water, and waste services. Established in 1995, ARERA safeguards consumer rights, promotes fair competition, and monitors pricing and service quality across the energy market. The authority also plays a key role in managing the transition to cleaner energy, ensuring that reforms and tariff structures remain inclusive and socially equitable.

Box 2 - ARERA, Italy's Energy Regulator

As Italy navigates these transitions, it is particularly important to ensure that energy remains accessible and affordable for all consumers, including those who already struggle to have their energy needs met.

2.2. ITALIAN POLICY CONTEXT

Energy policy

Across the European Union, new policies are reshaping the way households access and afford energy. The [Action Plan for Affordable Energy](#) and recently released [Citizens Energy Package](#) together set a bold course for a just energy transition that leaves no one behind, addressing energy poverty, supporting flexible market participation that benefits all consumers, ensuring consumer-friendly delivery of services and promoting better awareness and enforcement of consumer rights.

This builds on the [Energy Efficiency Directive \(2023/1791\)](#), which requires Member States to prioritise measures for people affected by energy poverty, and the recast [Energy Performance of Buildings Directive \(2024/1275\)](#), which accelerates renovation of the worst-performing homes and promotes One-Stop-Shops for consumers. The 2024 reform of EU Electricity Market Design has further reinforced retail rights, guaranteeing access to fixed-price or dynamic contracts, banning unilateral changes, and providing protections against disconnection for "vulnerable customers"⁹.

In Italy, the National Recovery and Resilience Plan (PNRR) funds renewable energy, energy efficiency, and skills programmes, and the Energy Social Bonus (*Bonus Sociale Energetico*) is a key financial

⁹ European Commission. (n.d.). *Electricity market design*. Retrieved September 30, 2025, from https://energy.ec.europa.eu/topics/markets-and-consumers/electricity-market-design_en

support for low-income households. It is applied automatically as a discount on electricity and gas bills for low-income households. To be eligible, households must have a valid Equivalent Economic Situation Indicator (ISEE) certificate, with indicator thresholds of €9,530 per year, and €20,000 per year for families with four or more children¹⁰. New measures introduced in 2026 anticipate a gradual expansion of these criteria and for additional one-off grants to be offered, as well as the possibility for suppliers to provide further voluntary discounts to households with higher ISEE thresholds (up to €25,000¹¹).

Consumer Protection Frameworks

Italy's consumer protection landscape is governed by a robust legal framework and supported by various institutions dedicated to safeguarding the rights of consumers. The cornerstone of consumer protection in Italy is the Consumer Code (*Codice del Consumo*), which consolidates national and EU regulations to ensure transparency, fairness and safety in transactions, and is managed by the [Ministry of Enterprises and Made in Italy \(MIMIT\)](#).

Italy has a rich consumer advocacy culture, with more than 20 national-level consumer organisations and numerous local ones working to champion consumers' rights, tackling unfair or unethical practices and providing guidance, legal support and dispute resolution to help consumers access safe and sustainable goods and services. The [National Council of Consumers and Users \(CNCU\)](#) brings together many of these consumer organisations, along with associations and regional government representatives, to advise on consumer policy, monitor implementation and foster coordination on consumer protection across Italy. The [Italian Competition Authority \(AGCM\)](#) also plays a crucial role by enforcing rules against anti-competitive practices, misleading advertising, and unfair commercial behaviour, complementing consumer protection efforts.

2.3. LOCAL PROJECT DESIGN

We conducted the pilot in Italy from January to December 2025. The country project Steering Group for this study was comprised of the following key local stakeholders:

- **Italian consumer organisations:** Confeuropa Consumatori Italia and Unione Nazionale Consumatori (UNC), as well as Associazione Consumatori Utenti (ACU).
- **Key civil society representatives in the energy sector:** Rete Assist and Banco dell'energia Foundation.
- **Local energy suppliers:** A2A, E.ON, Edison Energia and Enel.

10 Autorità di Regolazione per Energia Reti e Ambiente. (2025, April 2). *Electricity: ARERA approves rules for the extraordinary €200 contribution to families with ISEE between €9,530 and €25,000*. <https://www.arera.it/comunicati-stampa/dettaglio/elettricit-arera-approva-le-regole-per-il-contributo-straordinario-di-200-euro-alle-famiglie-con-isee-tra-eur-9530-e-25000>.

11 • ARERA (2026), *Bonus sociali: aggiornamento soglia ISEE a €9,796*: <https://www.arera.it/comunicati-stampa/dettaglio/bonus-sociali-arera-alza-a-9796-euro-la-soglia-isee-per-laccesso-alle-agevolazioni-per-acqua-luce-gas-e-rifiuti> ; Altroconsumo (2026), *Bonus bollette 2026*: <https://www.altroconsumo.it/casa-energia/elettricit-e-gas/news/bonus-bollette>
• CISL (2025), *Decreto bollette e bonus ISEE fino a €25,000*: <https://www.pensionati.cisl.it/notizie/decreto-bollette-come-richiedere-il-bonus-bollette-2025-requisiti-e-isee>

The Steering Group discussed and approved the project design. The Consumers International team then carried out an in-depth research and stakeholder engagement process, talking directly with 25 older Italian consumers and interviewing more than 50 global and local subject matter experts in energy rights, older persons' rights and other community interest groups. We also spoke with key local institutional bodies such as ARERA, AGCM and MIMIT.

We explored the lived experience and current challenges facing older Italian energy consumers today, as well the potential solutions that could be identified globally, within the energy sector and beyond, to address the barriers identified. We compiled a long-list of possible solutions for discussion with the Steering Group, who considered each possible solution for its effectiveness, relevance and workability in the Italian context.

The results that emerge represent the top 10 most important and actionable steps to assist older Italian energy consumers in accessing the energy they need to support their wellbeing. These recommendations are particularly powerful in that they have cross-sectoral support, from local consumer advocates, community representatives and energy suppliers alike.



3. THE FINDINGS: FROM CONSUMER EXPERIENCE TO MARKET SOLUTIONS

In this section, we present the findings of our research and listening process, sharing the experience of older people in Italy through the five stages of the energy consumer journey. Older people are not a homogenous group. While many challenges are shared, experiences and needs vary widely, and situations can shift over time. We illustrate this picture with insights gathered from expert interviews and from direct conversations with older Italian consumers. Where appropriate, names have been replaced with pseudonyms to preserve anonymity.

We then map the most impactful opportunities to better support consumers in their access to affordable energy, drawing on case studies collected from around the world to identify innovative approaches that are already demonstrating success.

The set of 10 solutions proposed below form the core of the Blueprint for Inclusive Energy Services for Italy. For each, we outline the opportunities for energy suppliers, alongside civil society and government, in supporting and implementing these best practices.



3.1 KNOWLEDGE AND AWARENESS

Our consumer research process highlighted major challenges for older Italian consumers in their communication with energy suppliers. During expert interviews, communication from energy suppliers was repeatedly described as fragmented, complex and difficult to interpret. Bills, contracts, and supplier communications often use technical language and inconsistent formats, making it difficult for consumers to identify key information or compare offers.

Dr. Marielle Feenstra, Co-founder and Scientific Director of 75inQ Institute for Inclusive Energy Transition, emphasised that one-size-fits-all communication fails to reflect the diversity of consumer needs, including among older women who may face compounded barriers related to literacy, income, and familiarity with financial systems. She highlighted that many communication channels and tools are designed with “standard” users in mind, leaving others excluded from effectively engaging with energy services.

Digitalisation has introduced additional complexity. While some older people are active online and engaged in new market channels¹², digital exclusion remains a major barrier in Italy. Only around 27% of older Italians use information and communications technology (ICT) regularly, one of the lowest rates in Europe. Many prefer face-to-face interactions and rely on cash (69% of transactions in 2022)¹³. Elderly consumers often struggle with digital customer service platforms, preferring in-person or phone support.

12 Olsson, T., & Viscovi, D. (2020). Who Actually Becomes a Silver Surfer? Prerequisites for Digital Inclusion. *Javnost - The Public*, 27(3), 230–246. <https://doi.org/10.1080/13183222.2020.1794403>

13 Gaia, A., & Sala, E. (2019). Older people's use of Information and Communications Technologies in Europe: The Italian case. *Autonomie Locali e Servizi Sociali*, 2, 163–183. <https://doi.org/10.1447/95863>.

This has significant implications in a system where comparison portals, bonus applications, and conciliation services are designed to be digital-first. For example, filing an ISEE declaration requires digital authentication, creating additional barriers for digitally excluded older consumers.

Online tools, apps and chat bots are offered to ease consumer engagement; but they require a level of digital access and technical confidence that not all consumers possess. Professor of Environment and Society at University of Leeds, Lucie Middlemiss, noted that digital-only systems can exclude individuals who lack digital skills or require alternative formats due to visual, auditory, or cognitive impairments. For these groups, more accessible non-digital channels, such as in-person assistance or phone support, remain critical to supporting understanding and engagement. Programmes like those provided by Anziani e Non Solo, a cooperative society focusing on social innovation for inclusion in Italy, run local digital facilitation courses to help older adults manage online processes, including energy contracts are a key support to help older consumers navigate our increasingly digitalised world.

In practice, older consumers often rely on intermediaries such as family members or carers to interpret information and navigate the system. Older people and their carers can experience stress and confusion when trying to contact their supplier, often struggling to navigate websites and feeling frustrated by generic call-centre responses. One 85-year-old consumer we spoke to, Angela, who struggles with visual and hearing impediments, shared that she felt confused by changing tariffs and was *"tired of the call centre robots"* encountered when trying to get help.

Where consumers have ongoing issues, it can be frustrating to explain their situation repeatedly to different customer service staff each time they reach out for help, or to deal with staff who are unsure how best to support them.

Trusted actors such as local authorities, social services, and civil society organisations play a critical role in bridging this knowledge and communication gap. However, not all consumers are able to benefit from these networks. Awareness of rights and entitlements remains unevenly distributed, reinforcing existing inequalities in access to energy services. Maria, a 75-year-old widow from Sicily explained, *"I do not even know what I am entitled to"*, reflecting a common experience among Italian energy consumers when trying to access information on rights, tariffs, and support schemes such as ISEE. Many older and customers experiencing vulnerability do not self-identify or reach out for help when they are struggling, due to shame, stigma or lack of knowledge or the skills to seek help. This means available support is not always getting through to those who need it.



SOLUTIONS 1, 2 & 3: IMPROVING INFORMATION ACCESSIBILITY AND COMMUNICATION

The challenges presented show that improving energy consumer knowledge and awareness is not only about providing more information, but about ensuring that information is accessible, understandable, and supported through appropriate channels. Drawing on the insights above, multiple opportunities emerge to design clear, inclusive information and proactive communication approaches, blending human and digital support across multiple channels.

Case studies illustrate how some of these approaches are already being implemented globally. They provide concrete examples of how accessible communication, improved targeting, and collaboration with intermediaries can improve consumer understanding, increase uptake of support, and strengthen consumer confidence in energy services.

SOLUTION 1 – ACCESSIBLE COMMUNICATION ACROSS ALL CHANNELS

EXPLANATION

Customer communications should be structured simply and inclusively, using inclusive design principles, with key elements validated through direct consumer testing wherever relevant to ensure messages reach the widest possible audience of customers.

STAKEHOLDER ROLES

SUPPLIERS

Adopt accessible communication models for customer communications and validate through direct consumer testing where relevant. Continuously build staff training in inclusive design and communication skills sets.

CIVIL SOCIETY

Play a role in testing prototypes; could provide feedback on usability with vulnerable consumers.

GOVERNMENT

Enforce communications accessibility requirements in line with European Directive 2019/944 on the common electricity market and the Digital Accessibility Directive (2019/882).

CASE STUDY:

Polska Grupa Energetyczna (Poland) - Redesigning bills with accessibility in mind

Polska Grupa Energetyczna (PGE) has taken a comprehensive approach to making customer communications more accessible, recognising that complex language and unclear bill formats can exclude older people. Staff are trained in using plain language, and bills feature simplified, accessible layouts and visual aids, as well as detailed information on energy use and support schemes. Customer service centres are equipped with magnifiers and sound amplification, and remote contact options are expanded. This demonstrates that inclusive design, combining digital and in-person solutions, can improve understanding, reduce stress, and build customer relationships.

SOLUTION 2 – PROACTIVE IDENTIFICATION OF VULNERABILITY THROUGH DATA-LED ANALYSIS

EXPLANATION

Use digital tools and artificial intelligence (AI) to analyse data on consumer behaviour and communications and learning processes to better understand when customers may be having trouble.

STAKEHOLDER ROLES

SUPPLIERS

Opportunity to use learning loops from customer service interactions, consumer complaints and Servizio Conciliazione to identify customers who may be experiencing difficulties.

CIVIL SOCIETY

Consumer organisations could provide feedback and support customer service training.

GOVERNMENT

Set privacy/fairness guardrails in line with General Data Protection Regulations (GDPR)

CASE STUDY:

American Electric Power (USA) - Data-led outreach to customers in vulnerable circumstances

American Electric Power (AEP), a major U.S. utility serving millions of customers across multiple states, has deployed advanced digital tools in partnership with Oracle to identify and engage households likely to be eligible for energy assistance programmes. By analysing a combination of household-level usage data and demographic information, AEP was able to pinpoint customers with low-to-moderate incomes who were at risk of struggling with energy costs and not yet enrolled in support schemes. Targeted, personalised communications, including proactive email campaigns, were used to raise awareness of assistance options at critical moments, leading many recipients to complete eligibility surveys and apply for energy support. This data-driven approach demonstrates that responsible use of analytics can bridge awareness gaps, improve targeted engagement with customers, and support uptake of social tariffs and programmes.

SOLUTION 3 – PERSONALISATION AND CONTINUITY IN CUSTOMER CARE

EXPLANATION

Build personalisation and continuity in engagement with older consumers through approaches such as assigning dedicated supplier contacts and working closely with carers, and strengthening collaboration with accredited consumer organisations, or other trusted intermediaries who can help them and their caregivers navigate energy services. Continuously update training of staff responsible for customer interaction, while allocating dedicated resources and ensuring consistent standards across teams.

STAKEHOLDER ROLES

SUPPLIERS

Regularly update and improve training and resourcing for staff responsible for customer interaction and for better supporting customers experiencing challenges or their carers with complex cases, for example, help obtaining applicable bonuses/benefits and ensuring the availability of territorial supplier contact points. Explore internal caseworker models and/ or collaborate with relevant associations to act as intermediaries for those vulnerable consumers.

CIVIL SOCIETY

Consumer associations and other relevant associations should be empowered as representatives for customers in need of support, with dedicated communication channels into supplier customer service teams and response times agreed with suppliers.

GOVERNMENT

Could encourage or mandate accredited customer liaison protocols; benchmark complaint resolution times to drive compliance.

CASE STUDY:

ENGIE and EDF (France) - Strengthening frontline support through social worker partnerships

In France, both ENGIE and EDF have developed dedicated tools and services to improve access to energy support for households in vulnerable situations by empowering social workers and intermediaries. ENGIE's Solidarité ENGIE portal and dedicated helpline offer authorised social partners direct access to information and assistance tools, enabling them to manage support requests and help customers in difficulty more efficiently. The portal has seen growing use year after year, with hundreds of thousands of interactions submitted. EDF operates a solidarity support system that includes a portal designed to streamline the submission and tracking of assistance requests by social workers, supported by dedicated solidarity advisers and partnerships with local associations and municipal social services. These initiatives illustrate that when collaboration between energy suppliers and social services delivers faster, more effective customer support.



3.2 AVAILABILITY OF SAFE AND AFFORDABLE SOLUTIONS

For pensioners living on fixed incomes, affordability is a daily calculation. After retirement, incomes drop while per capita energy use rises, making bills harder to manage¹⁴. Rising prices are forcing some to choose between essentials such as heating and food, or between turning on the air conditioner and saving money for medicines. Energy poverty affects approximately 2.4 million households in Italy, and the lived experience of this was expressed by many of the older consumers we spoke to. Laura, who helps her 84-year-old mother manage her energy bills at her home in Turin, shared, “the bills are overwhelming. I manage everything, but nothing is easy or clear. And we still don’t qualify for help.”

Others are unaware of available support. Advice remains fragmented across websites and departments, leaving many confused and discouraged. Barriers to accessing energy support are often not only financial, but also linked to institutional complexity, low awareness, and administrative burden, which prevent eligible households from claiming available assistance¹⁵. Trusted actors such as local authorities, social services, and civil society organisations play a critical role in navigating these challenges, providing clear and trusted information about energy choices and support through community outreach programmes or one-stop-shop services. However, these services are often unknown to those consumers who need them most.

Banco dell’energia Foundation, funded by A2A, Edison, and the other companies sitting on its Board, promotes inclusive energy community projects aimed at supporting vulnerable households.

Financial pressure reduces the mental bandwidth to make decisions, making it harder for households to find solutions, a phenomenon that Agnese Cecchini, co-founder of the Italian Energy Poverty Alliance, agrees¹⁶. Analysis of the Italian retail electricity market confirms that even switching suppliers, a key strategy for accessing better tariffs, can involve high costs, both financial and in terms of time and cognitive burdens associated with navigating a complex range of market offers¹⁷.

Loyalty to energy suppliers is common among older consumers, and they falsely assume that they are rewarded for their loyalty, when in fact their long-standing contracts are rarely the most affordable. Remaining with the same provider does not necessarily indicate trust. On the contrary, the realisation that they are effectively paying a “loyalty premium” can erode trust further. As Saverio, an 81-year-old retired tiler, reflected during the interviews, “I stayed with the same supplier for years thinking it would be better but later realised I was paying more than others.” Proactive measures to check-in with customers to offer tariff and plan advice or support, like flexible payment options, are examples of good customer service that are cost-effective for suppliers, tackling the root cause of non-payment and building customer resilience.

14 Bardazzi & Paziienza, *Switch off the light*.

15 Bouzarovski, S. & Petrova, S. (2015), *Energy Research & Social Science*, 10, 31–40.

16 A. Cecchini, Co-founder, Gruppo Italia Energia / Alleanza contro la Povertà Energetica, personal communication, 9 June 2025.

17 albonesi, P., Magnani, M., & Manenti, F. M. (2024). *Measuring switching costs in the Italian residential electricity market*. *The Energy Journal*. <https://doi.org/10.5547/01956574.45.2.mmag>

SOLUTIONS 4 & 5: BOOST AVAILABILITY OF AFFORDABLE OPTIONS

These dynamics show that affordability is shaped not only by external market and geopolitical conditions, but also by structural barriers in how energy services are communicated and delivered. There is clear scope for suppliers, civil society, and government agencies to play complementary roles in reducing these barriers and improving access to affordable energy options. The following solutions outline practical measures to boost affordability in the Italian energy market.

SOLUTION 4 – ENERGY ADVICE AND SUPPORT DELIVERED THROUGH TRUSTED INTERMEDIARIES

EXPLANATION	Strengthen collaboration with community intermediaries which play an important role as trusted sources of accurate information, advice, training and support services about energy choices and resilience-building for customers and their carers.
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STAKEHOLDER ROLES

SUPPLIERS	Collaborate with consumer associations and one-stop-shop providers to supply advice to customers in need. This could include formal funded partnerships.
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CIVIL SOCIETY	Accredited consumer associations, municipal one-stop-shops and other independent information sources may act as affordability enablers, offering impartial guidance on managing energy costs and accessing support. They can also feed evidence of systemic affordability barriers back to wider energy system stakeholders.
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GOVERNMENT	Support standardised protocols for streamlined and neutral information provision, fund one-stop shops, and accredit intermediaries.
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CASE STUDY:	Rete Assist (Italy) - Personalised guidance through Household Energy Advisors
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In Italy, an effective model exists in the TED (Tutor per l'Energia domestica / Household Energy Advisor) programme, which direct expert advice to underserved households who often lack practical knowledge about efficient home energy use and the assistance programmes available. TED advisors act as trusted intermediaries, providing personalised advice on energy consumption, available support schemes, and practical home energy saving solutions. By connecting consumers with technical experts, the model helps to ensure that households receive accurate, actionable information while fostering inclusion in energy services. This model demonstrates that trusted advisory networks can significantly empower consumers and rebuild trust in the energy system in Italy and elsewhere.

SOLUTION 5 – REGULAR CUSTOMER CHECK-UP

EXPLANATION

Suppliers proactively check-in with older customers to offer them assistance with understanding their energy bills and navigating the energy market.

STAKEHOLDER ROLES

SUPPLIERS

Suppliers regularly (e.g. annually) contact the customer or their representative to offer help with understanding their energy bills, key cost components, differences between tariff types, and how to access tools such as the Bonus Sociale.

CIVIL SOCIETY

Consumer organisations could monitor tariff design impacts across the market and offer support to consumers experiencing challenges in accessing bonuses and the right tariff for them.

GOVERNMENT

Opportunity to strengthen Bonus Sociale funding, criteria and outreach to ensure customers and their carers are aware and able to access it.

CASE STUDY:

Toast Electric (New Zealand) – Winter Energy Support Scheme

Toast Electric has implemented measures to help households in need of support manage seasonal energy costs. Recognising that spikes in winter heating bills can place significant financial strain on households facing energy challenges, the company introduced capped winter energy bills and conducts regular tariff reviews in consultation with its customers. These measures provide predictability, reduce the risk of debt, and ensure households can maintain access to essential energy services. This case demonstrates that fair and transparent pricing, combined with ongoing engagement, can protect households from seasonal hardship while enhancing trust in energy providers.



3.3. INVESTMENT IN TECHNOLOGY

The energy sector is rapidly evolving, to offer solutions with potential for long-term household savings such as electrification of home energy use – for example through heat pumps - as well as the development of smart devices, community energy, rooftop solar and flexible tariffs. Consumer organisations like Confeuropa Consumatori Italia are enthusiastic about the potential of these new opportunities to empower Italian consumers to take more control of their energy costs; promoting participation in renewable energy communities in particular.

However, upfront costs, uncertainty around payback periods, and the complexity of available options prevent many consumers from accessing these opportunities in practice. Dr. João Pedro Gouveia, distinguished academic from NOVA University of Lisbon, confirmed that many struggle to decide whether to invest in promoted energy technologies such as heat pumps, better insulation, or solar panels, because the market does not provide clear, comparable, and transparent information on costs, potential savings, and long-term value.

These challenges are particularly acute for older households, who often face additional constraints related to fixed incomes, limited digital literacy, and reduced confidence in navigating unfamiliar technologies. Information asymmetries further compound the issue. Communications around new technologies are often targeted at digitally active or younger households and are rarely adapted to the needs of older consumers. Phd Researcher in Energy Demand at University of Leeds, Mathilde Rainard, agreed that older consumers often lack access to tailored advice or trusted intermediaries who can guide them through investment decisions.

This was confirmed by consumers we spoke to. When asked about their interest in new energy technologies, Maria, a retired teacher from Bari, expressed the perception that, *“it is not for people like me”*. Without more tailored support, the process of identifying, financing, and implementing energy upgrades can feel overwhelming and inaccessible for older consumers, meaning these opportunities are less likely to be taken up by those who may benefit most.



SOLUTION 6: SUPPORT INVESTMENT IN ELECTRIFICATION & INNOVATION

Beyond awareness, a challenge lies in enabling access to new technologies. Below, we outline how innovative and targeted delivery models can reduce both perceived and actual complexity of electrification and energy efficiency opportunities, ensuring they meet the needs of all households.

SOLUTION 6 – TARGETED ELECTRIFICATION AND ENERGY EFFICIENCY PROGRAMMES

EXPLANATION	Design targeted programmes for subsidised support for older households and their carers to access the benefits of electrification, energy efficiency upgrades and smart devices, coupled with clear operational information
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STAKEHOLDER ROLES

SUPPLIERS	Suppliers regularly (e.g. annually) contact the customer or their representative to offer help with understanding their energy bills, key cost components, differences between tariff types, and how to access tools such as the Bonus Sociale.
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CIVIL SOCIETY	Opportunity to assist suppliers to identify eligible homes and provide aftercare support to consumers as needed. Opportunity to offer advice energy advice and training targeted to older consumers and their carers.
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GOVERNMENT	Ensure transparency rules are observed, including cooling-off and exit protections; integrate demand side flexibility in national frameworks.
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CASE STUDY:	<u>PG&E</u>, <u>SCE</u>, and <u>SDG&E</u> (USA) - Energy Savings Assistance Program
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Low-income households tend to live in energy-inefficient homes, facing higher bills and lower levels of comfort than better-off families. To address this, PG&E, SCE, and SDG&E deliver the Energy Savings Assistance Program (ESAP), providing no-cost weatherisation, energy-efficient appliances, and smart thermostats for both individual and multifamily homes where they meet the income criteria. By scaling up these upgrades, the programme reduces household energy costs, improves comfort, and supports emissions reduction and operational efficiency for suppliers; benefitting both consumers and energy providers.



3.4. EFFICIENT, SAFE AND EFFECTIVE ENERGY USE

Older people living alone typically use more energy per capita due to inefficient housing and more time at home¹⁸. But rising prices are forcing many to cut back: limiting heating, switching off fridges, or using unsafe appliances. The day-to-day coping mechanisms used by many older consumers, especially those on low incomes, who may not be able to afford upgrades or demand improvements from landlords, was expressed by Cristina, who lives alone in her home in Rome, and simply shared, “I just switch everything off”. Many reduce the use of ovens despite the importance of cooking in Italian traditions, with a profound impact on wellbeing and quality of life. A 90-year man interviewed in Turin, Francesco, reflected, “I love cooking, but the energy bills are so high, I am depriving myself from using the oven. Those prices have taken away the pleasure of cooking a nice meal.” His experience illustrates how rising costs are turning essential or culturally meaningful activities into luxuries.

As climate change intensifies, the increased frequency of heatwaves is driving up summer energy demand in Italy. During Italy’s record heatwaves, older people are among the worst affected, with the country recording the highest heat-related mortality in Europe in 2024¹⁹. Summer energy poverty is now appearing not only as a financial issue but also a public health concern, increasing risks for older populations while placing additional strain on the energy system. By 2050, exposure of people aged 69 and over to hot days is expected to more than double globally²⁰.

For those dependent on medications and medical devices, consumption often cannot be reduced. The fridge must stay on; oxygen concentrators cannot be unplugged. The psychological burden of receiving high bills each month can remain significant. Francesco also highlighted additional barriers linked to hearing impairment, which makes it difficult for him to engage with customer service channels. He described energy bills as “taboo”, reflecting a sense of shame and resignation around seeking support. Stories like his illustrate how financial pressure, communication barriers, and psychological factors intersect to shape consumer outcomes.

These challenges underline the importance of carers and intermediaries. Family members or trusted social workers often bridge the gap between older people and the services they need. Around 8% of Italians, mostly women aged 45-64, provide unpaid care that directly supports older people’s comfort,

energy use, and access to services²¹. However, we heard that carers themselves may lack the knowledge, resources, or formal access required to effectively support energy-related decisions, and they are often excluded from communication loops with suppliers. Member of the Italian Social Affairs

18 Pais-Magalhães, V., Moutinho, V., Robaina, M. Is an ageing population impacting energy use in the European Union? Drivers, lifestyles, and consumption patterns of elderly households, *Energy Research & Social Science*, Volume 85, 2022,102443, ISSN 2214-6296, <https://doi.org/10.1016/j.erss.2021.102443>.

19 ANSA English Desk. (2025, September 22). Italy top in Europe for heat-related deaths in 2024. ANSA. https://www.ansa.it/english/news/general_news/2025/09/22/italy-top-in-europe-for-heat-related-deaths-in-2024_e71721f2-e11a-4cf4-8487-f22414319860.html.

20 Falchetta, G., De Cian, E., Sue Wing, I. et al. Global projections of heat exposure of older adults. *Nat Commun* 15, 3678 (2024). <https://doi.org/10.1038/s41467-024-47197-5>

21 Santini, S. (2025). Intergenerational informal caregiving in an ageing society: The case of Italy. In S. Santini (Ed.), *Intergenerational caregiving in Europe* (pp. 85–102). Springer. https://doi.org/10.1007/978-3-658-48005-9_5.

Commission, Ilenia Malavasi, explained that caregivers in Italy often act in the shadows, sacrificing their professional path to care work, without adequate recognition or support. This makes them particularly vulnerable to various types of stress, including financial stress, and limits their ability to assist older people with energy-related needs.

SOLUTIONS 7 & 8: ACKNOWLEDGE DAY-TO-DAY COPING MECHANISMS

Ensuring that day-to-day coping mechanisms are safe and effective requires practical measures to support and empower both older consumers and their carers. Solutions must acknowledge the lived realities of households in vulnerable situations, putting consumer needs and wellbeing at the core of service design. The following solutions highlight mechanisms to simplify access and ensure energy wellbeing while maintaining autonomy and safety for older people.

SOLUTION 7 – SIMPLIFIED PROXY ACCESS FOR CARERS	
EXPLANATION	Ease the delegation of access to energy account information to designated carers and improve communications to ensure older customers are aware of this opportunity.
STAKEHOLDER ROLES	
SUPPLIERS	Promote communications aimed at informing customers of the possibility of having their energy supplies managed by a delegated person or entity. Make sure communications explicitly mention carers where appropriate, so they know what support is available to them.
CIVIL SOCIETY	Carers' associations could play a key role in validating proposed access protocols and act as intermediaries in communication between suppliers and carers.
GOVERNMENT	Align processes with GDPR and eID frameworks; recognise carers explicitly in the definition of vulnerable groups eligible for energy support; develop targeted grants or credits for carers within bonus application process; linked to Bonus Sociale.
CASE STUDY:	Bank of Scotland (UK) – Power of Attorney Support
<p>Older consumers often require a trusted person to manage their accounts, yet rigid procedures can make this slow and stressful. To address this, the Bank of Scotland streamlined proxy management through Power of Attorney (POA) setups, ensuring that trusted representatives can manage accounts efficiently. Independent platforms, such as MoneySavingExpert, even rate banks on the ease and speed of POA registration, highlighting those that process requests promptly for existing accounts. Energy suppliers could follow the lead of the financial services sector, to provide simple, safe and timely proxy access, by creating consent-based systems that allow carers to manage bills and energy services without unnecessary barriers.</p>	

SOLUTION 8 – COORDINATED SUMMER RESILIENCE SUPPORT

EXPLANATION

Provide a coordinated response to protect older consumers from summer heatwaves, with measures such as providing individual cooling kits, behavioural advice, and advance alerts about overheating risks, as well as wider community-level social-health responses.

STAKEHOLDER ROLES

SUPPLIERS

Proactively communicate with information campaigns targeting older consumers and their carers during the summer season, with support on best practices from managing during heatwaves and access to household-level solutions such as efficient cooling devices. Opportunity to signpost and support coordinated community or public heatwave responses such as cooling centres.

CIVIL SOCIETY

Civil society organisations collaborate to alert and support consumers in vulnerable circumstances during heatwaves, including coordinated communications campaigns and solutions. Can play a role in assisting suppliers to support their older customers.

GOVERNMENT

Reinforce the National Heatwave Plan with financial support to local, supplier led and collaborative summer resilience initiatives, and provide a framework to support a sustainable and structured response to heat-related risks across regions.

CASE STUDY:

Croce Rossa Italiana (Italy) – Progetto OASI Cooling Centre

During the severe heatwaves of summer 2024, the Italian Red Cross, in collaboration with Banco dell'energia and Edison, established the Progetto OASI Cooling Centre at the CRI Area Sud Milanese headquarters in Opera to support people most at risk from extreme heat. The initiative equipped the centre with climate control systems and, subsequently, a photovoltaic installation that supplied around half of its energy needs, ensuring a cool, safe space for residents during high temperatures. The centre offered environmental refuge and also socio-health services, awareness-raising activities on heat-related health risks, and community outreach, including free shuttle services to health facilities. In its first season, the project reached hundreds of people and trained volunteers on energy poverty and climate impacts. This demonstrated that collaborative, community-level responses, supported by multiple stakeholders, can deliver critical support and enhance climate resilience for households.



3.5. MAINTENANCE, REPAIR AND REDRESS

Faced with the range of challenges described above, our research revealed a general erosion of consumer trust in Italy's energy sector. The complexity of available offers, such as bundled energy products and ancillary services, while they may simplify certain aspects of billing or service provision, were noted as eroding trust when not clearly explained or aligned with consumer needs. Italian consumer advocacy group Unione Nazionale Consumatori highlights that some energy offers emphasise only part of the price (e.g., the energy component) while leaving out fixed charges or add-ons, the need for full transparency so consumers can make informed choices²².

Trust is being further undermined by aggressive or misleading sales practices, including unsolicited calls, door-to-door sales, and pushy upselling tactics. During our interviews with consumers, a retired engineer named Giorgio, described how repeated cold calls with confusing sales pitches left him fearful of hidden conditions or scams, saying, *"they fooled me once with nice words and fake discounts. Now, every time I receive a new bill, I think it's happening again"*. Consumers International's Scams Barometer highlights that scam activity is widely perceived to be increasing, with 71% of consumer advocates reporting a rise in scams globally²³. According to the European Commission, older consumers are particularly affected by scams and rogue practices²⁴. These experiences contribute to a generalised fear of fraud, especially in digital or telephonic interactions that are difficult to verify. As a result, legitimate outreach from suppliers or support services is often ignored, limiting access to beneficial tariffs, assistance schemes, or advisory services.

When customers reach out for help, support systems can feel impersonal and fragmented, creating a sense of isolation and discouraging efforts to achieve a resolution. The struggles of many older consumers navigating customer support systems was summarised by Angela, a 79-year-old living alone in Turin who said, *"there's no real help"*.

Some energy companies have taken proactive steps to address these risks. At the institutional level, ARERA has established rules relating to contracts agreed at a distance²⁵ and a formal dispute resolution service, which support the prevention of fraud and support dispute resolution in Italy, alongside the work of national consumer rights bodies. While these processes are critically important to upholding consumer rights, awareness of them, and requirements for digital access and procedural familiarity to engage with them, can be challenging for older individuals, particularly those in more vulnerable circumstances. Without adequate support, these mechanisms risk remaining underused by the very consumers they are designed to protect.

22 Unione Nazionale Consumatori. (2023). *Trasparenza nelle offerte energetiche per i consumatori: criticità e raccomandazioni*. <https://www.consumatori.it/energia>.

23 Consumers International, *Scams Barometer*, 2025.

24 European Commission (2017). *Consumer vulnerability across key markets in the European Union*. Luxembourg: Publications Office of the European Union. <https://op.europa.eu/en/publication-detail/-/publication/d1af2b47-9a83-11e6-9bca-01aa75ed71a1/language-en>.

25 Resolution 228/2017/R/com sets up rules for electricity and/or natural gas supply contracts agreed at a distance, including preventive protections and a restorative procedures (voluntarily agreed by both the end customer and the seller) if the rules for fair contracting practices have not been respected. <https://www.arera.it/schede-tecniche/dettaglio/it/schedetecniche/17/228-17st>.

SOLUTION 9: BUILD CONSUMER CONFIDENCE

Building consumer confidence in the energy sector requires a robust consumer protection regime along with agile responses from market actors to protect consumers from the fast-evolving landscape of consumer-targeted scams. This includes ensuring transparent reporting and redress mechanisms are genuinely accessible and easy to navigate so consumers can effectively raise and resolve issues.

SOLUTION 9 – CROSS-CHANNEL VERIFICATION SYSTEMS

EXPLANATION

Rebuilding consumer trust in Italy’s energy sector, requires a collaborative and multifaceted approach, to strengthen consumer protection mechanisms – both through legislation and through supplier processes and practices. More accessible reporting and redress mechanisms will ensure that new scam tactics are identified and addressed quickly in the fast-changing landscape of online services, verification, and sales systems.

STAKEHOLDER ROLES

SUPPLIERS

Implement strong, innovative consumer protection practices across all sales and communication channels (apps, websites, call centres, in-person), supported by internal monitoring and clear guidance for customers on identifying legitimate contact, such as hosting customer meetings or information materials.

CIVIL SOCIETY

Continue to support consumers with information and education and in Alternative Dispute Resolution and *Servizio Conciliazione*.

GOVERNMENT

Opportunity to develop and publicise a single national reporting channel for misleading practices and impersonation attempts to enable rapid enforcement (with penalties) and build trust. Support the education of consumers about the risks and protection systems such as the restoration procedure provided by Resolution 228/2017/R/com.

CASE STUDY:

Wise (Global) – On-Call Fraud Detection

Older consumers are particularly exposed to scam calls impersonating legitimate companies, which can lead to anxiety and financial losses. To address this, Wise implemented a real-time fraud detection system across multiple channels, combined with proactive user education. Features such as “active call” status for payments allow consumers to verify they are speaking with Wise, triggering an immediate warning if verification fails. This approach demonstrates that integrating technology with consumer awareness can effectively reduce fraud risk, protect older consumers, and rebuild trust in digital services.

3.6. ONGOING MULTI-STAKEHOLDER COLLABORATION

The Blueprint for Inclusive Energy Services reflects this collaborative approach in practice, bringing together diverse stakeholders to co-create solutions grounded in real consumer needs. As highlighted by Stefan Bouzarovski, Professor of Human Geography at University of Manchester and co-founder of the European Union Energy Poverty Observatory, addressing energy vulnerability requires coordinated action across multiple actors, including public institutions, civil society organisations, and intermediaries working together to provide care, advocacy, and support to households²⁶.

The organisations directly involved in the Blueprint for Inclusive Energy Services have demonstrated strong leadership in support of energy consumers in vulnerable circumstances and have indicated their intention to further explore many of these solutions at an organisational level, and consider implementation where it fits with their own commercial activities. In addition, all Italian energy market participants are invited to consider the solutions outlined in this Blueprint for Inclusive Energy Services as potential pathways to enhance the effectiveness of the energy market for the benefit of all individuals and households in Italy.

The final recommendation proposes a mechanism to consolidate commitment to delivering inclusive energy services and provide a benchmark for the continuous pursuit of these objectives beyond the lifetime of this project. The *Inclusive Energy Services Decalogue* proposed in Solution 10 below can facilitate the widening of this dialogue, to engage any energy market actors wishing to do better, and to demonstrate their commitment to energy consumer protection and empowerment in Italy.

The Inclusive Energy Services Decalogue could provide a structured framework for collaboration across the Italian energy sector. The Decalogue sets out principles, objectives, and practical solutions for the fair treatment of consumers in vulnerable circumstances, offering guidance that suppliers, civil society and consumer organisations, and government actors can consider within their own context.

Industry-wide participation is encouraged, allowing energy suppliers to align their operations with protective care principles and ensuring consistent standards across the market. Civil society and consumer organisations play a key role in promoting the Decalogue, supporting its integration into advocacy and service delivery, and acting as independent coordinators to monitor market implementation and impact. Government involvement can further strengthen initiatives by integrating the Decalogue's principles into national strategies, including measures such as the Bonus Sociale, and by fostering mechanisms that support collaborative implementation. By consolidating these objectives and encouraging joint ownership across stakeholders, the Decalogue would illustrate how coordinated action can drive lasting improvements in consumer protection and equity in energy services.

²⁶ Bouzarovski, S. (2025). The Infrastructural Labor of Residential Energy Intermediation: Enacting Solidarity in Times of Crisis. *The Professional Geographer*, 1–7. <https://doi.org/10.1080/00330124.2025.2582786>

SOLUTION 10 – AN INCLUSIVE ENERGY SERVICES DECALOGUE FOR ITALY

EXPLANATION	Formalise and disseminate an Inclusive Energy Services Decalogue document to provide a benchmark for best practice within the sector and framework for an ongoing, collaborative approach to the improvement of service standards for fair treatment of energy customers experiencing vulnerabilities in Italy. Participants in the Decalogue express their broad support for the principles, objectives and solutions developed through the Blueprint for Inclusive Energy Services report.
STAKEHOLDER ROLES	
SUPPLIERS	All energy suppliers in Italy could be guided by the Decalogue to adopt an approach that supports the principles of protective care and effectively responds to the needs of vulnerable customers. Each supplier should assess the opportunities to implement the solutions where they fit with their own commercial activities.
CIVIL SOCIETY	Consumer and/or other civil society organisations may integrate the principles set out in the Decalogue into their activities, promoting their adoption and support.
GOVERNMENT	May support Decalogue development; should better integrate the Bonus Sociale into consumer strategies.
CASE STUDY:	<u>Energy Engage Code (Ireland) – Industry Commitments</u>
<p>Consumers facing financial hardship often struggle to access support and may experience inconsistent or unfair treatment in the energy market. In response, Irish energy suppliers collectively adopted the Energy Engage Code, a voluntary framework in which companies commit to provide meaningful support pathways for customers in vulnerable circumstances. The Code sets out minimum standards for engagement, including proactive communication, tailored assistance and protections for those at risk of disconnection. By aligning practices across the industry and increasing transparency and accountability, this initiative demonstrates how voluntary, coordinated action can raise service standards, improve consumer outcomes, and rebuild trust in the energy sector.</p>	

4. CONCLUSION AND A WAY FORWARD

Through a process of cross-sector dialogue and active listening to Italian consumers and their representatives, this edition of the Blueprint for Inclusive Energy Services project has illuminated the key challenges facing older energy consumers in Italy today. Older consumers stand at a fragile intersection of demographic change, structural inequalities, and a rapidly evolving energy system, and are urgently in need of better services from the local energy market. We found that the daily experience of many older energy consumers in the energy market, especially those facing intersecting challenges such as energy poverty, is shaped more by confusion, exclusion, and resignation than by empowerment.

Our co-creation process ensured that each of the 10 proposed solutions reflects the lived experience and real needs of older Italian consumers; supports them in accessing improved services; and provides energy sector actors with a set of practical, locally relevant objectives that can inform future practice. Each consumer challenge we identified presents an opportunity for innovation and for collaborative solutions. Italy's extensive network of consumer organisations is well placed to support continued dialogue on how energy services might better meet consumer needs and can play an important role in supporting progress.

Certainly, the way forward lies in designing future energy services in a way that better reflects the lived realities of older consumers, broadening their choices and rebuilding trust, dignity, and resilience within the energy system – delivering a just and inclusive energy transition and an improved quality of life for all.



DEFINITIONS RELEVANT TO THE ITALIAN MARKETPLACE

Carer/Caregiver: A carer, most often female, provides ongoing support to someone unable to live independently due to age, illness, or disability, helping with daily tasks like eating, bathing, or dressing. Carers can be paid or unpaid. In Italy, caregiving takes two main forms:

- **Informal carers (“caregiver informali/familiari”):** usually unpaid family members who assist a dependent person outside of any professional arrangement.
- **Paid carers (“badanti”):** professional home assistants hired to provide personal care, shopping, cooking, cleaning, and other household support.

Consumer: Anyone who purchases or uses goods or services, including energy, for personal or household purposes, with the right to safe, fair, and sustainable treatment.

Energy Poverty: Lack of access to adequate reliable, affordable energy to meet basic needs such as heating, lighting, cooking, and communication. In Italy, it refers to households struggling to afford essential energy services or spending an excessive share of income on them.

Older Person: The UN defines an older person as an individual aged 60 years or over. In Italy, the National Institute of Statistics (ISTAT) defines older adults as 65 years and over, but for social policies, individuals aged 75+ are considered particularly vulnerable due to the likelihood of frailty, health limitations, and higher energy needs. Therefore, for the purposes of this report, which focuses on energy vulnerability among older consumers in Italy, an older person is defined as someone aged 75 years or over.

Person with Disability: Someone with long-term physical, mental, intellectual, or sensory impairments that may limit full participation in society. In Italy, Law 104/92 defines a person with a disability as one whose impairment causes social, learning, or work disadvantages.

Supplier: In the energy sector, a supplier is any entity that provides electricity, gas, or other energy services to consumers in the retail market. In Italy, suppliers manage customer contracts, billing, and compliance with regulatory standards set by the Regulatory Authority for Energy, Networks and Environment (ARERA).

Vulnerable Consumer: Globally, “vulnerable consumer” is a term commonly used in policy to refer to someone more likely to face disadvantage due to factors like age, health, income, or disability. In Italy, primary legislation defines vulnerable consumers for electricity and natural gas as “domestic customers who are economically disadvantaged, seriously ill, disabled (Law 104/92), living in emergency housing or minor islands, or aged 75 and over”.

At Consumers International, no consumer is considered inherently vulnerable; rather, vulnerability arises from specific circumstances. We believe inclusive policies should be designed with consumers in the most difficult situations in mind, to support fair access to essential services for all consumers.

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We thank all contributors for their valuable insight and feedback, while noting that the recommendations presented here do not necessarily reflect the individual views of all organisations in the Steering Group or list of Contributors.

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