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To whom it may concern,

Consultation on framework for consumer standards and policy options to address priority customer service issues

Thank you for the opportunity to respond to this Ofgem consultation. This response is made on behalf of Cadent and can be published by Ofgem. Cadent is supportive of the framework to further improve standards in the retail energy sector for all consumers and to the focus on addressing current priority customer services issues before winter 2023/24. Whilst we acknowledge that the consultation is in relation to the retail market only, we are mindful of the consequential impact on the wider gas market and communication with customers, specifically the National Gas Emergency Service (0800 111 999). We have therefore not responded to the individual consultation questions, however, below we have highlighted a few key considerations.

Concerns around the ease of contacting suppliers

Cadent operates the National Gas Emergency Service on behalf of all Gas Transporters for consumers to report an actual or suspected gas leak, smell of gas, or carbon monoxide presence. In December 2022, we experienced an unprecedented increase in the number of consumers calling the service for what they deemed to be a gas emergency (during this period, the service received ten of the highest demand days ever). When we analysed the calls, the majority were not related to gas leaks or issues which met the definition of a network gas emergency¹ which the service is designed to cover. Examples of non-network gas emergency related calls that we received include metering queries, billing issues, and in-home appliance faults and issues. These additional misdirected calls to the service impacted on the ability of consumers in a network gas emergency to speak to a call adviser in a timely manner, and inhibited the timely despatch of an emergency engineer to the customer posing a real risk to life and property.

Through our engagement with other Gas Networks and Energy UK, we are aware that there has been a significant increase in consumer calls across various gas industry sectors. We have collectively seen a material change in consumer behaviour that we believe has led to consumers calling the National Gas Emergency Service, as it is one of the very few 24/7 call centre services and well publicised on energy bills and appliances. Many of these consumers explained to our Call Agents that they had called the National Gas Emergency Service as a last resort, because they were unable to contact their gas supplier or other in-home service providers. As noted in the consultation document, many gas suppliers only operate their call centres during traditional business hours and are typically closed on weekends. We therefore support 'contact ease' as a priority issue which requires focus before winter 2023/24.

¹ The Health and Safety Executive (HSE) aligned interpretation of the Gas Safety (Management) Regulations 1996 is that the National Gas Emergency Service is for reporting leaks, including loss of pressure / loss of supply events.

With this in mind, we have been working with the other Gas Networks and Gas Suppliers, via Energy UK, to look at ways in which we could collectively better signpost customers to the right call centres and communication channels and how we better coordinate the resilience of the services across the industry in peak times. This work has been supported by the HSE and Ofgem and the proposals in this consultation would further support these actions.

Please contact me should you wish to discuss any aspect of this consultation response.

Yours sincerely,

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