

Guidance on Ofgem’s expectations for consumers to be able to contact their supplier

Domestic Customers¹ want and need to contact their energy supplier for various reasons. They may want to report a fault with their meter, query or seek support on their bill, or arrange an appointment for a meter read. In some cases, they may also be off-supply and in need of urgent support.

It is critical that customers are able to contact their supplier easily. Being easy to contact is a critical part of suppliers delivering good service to customers.

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¹ All ‘customer’ and related references in this document are to Domestic Customers

Introduction

The Status of this document

- 1.1 The purpose of this guidance document is to set out what actions Ofgem currently expects suppliers may need to take to satisfy their underlying licence obligations, without being prescriptive.
- 1.2 Some of the licence obligations referred to in this guidance document have been in force for some time already (i.e. licence condition 0, 4A, 26.5 (e) and 31G.1 – 31G.3), whereas other licence obligations are Standard Licence Conditions (SLCs) (i.e. SLCs 31G.3A – 31G.3C and SLC 31G.3E) we introduced more recently. Furthermore, under SLC 0.8 and SLC 31G.3E, a supplier must have regard to any guidance we issue on how to comply with the obligations set out in those SLCs.
- 1.3 Depending on a supplier's circumstances, customers' needs and business model, each supplier will have different means of meeting their licence requirements and we recognise that not all of those are captured in this guidance. A supplier may be able to demonstrate compliance with their licence obligations in other ways than those set out in this guidance. We expect suppliers to be able to demonstrate how their practices meet the licence requirements and achieve good consumer outcomes.
- 1.4 This guidance does not introduce new obligations on suppliers. In assessing compliance with licence obligations, we may also consider aspects of compliance not captured by this guidance note. Where a supplier considers that contents of this guidance are not consistent or in conflict with their obligations in the supply licence, or other relevant statutory requirements, then nothing in this guidance document should be considered to override those obligations.
- 1.5 Our Enforcement Guidelines provide information on the enforcement framework that we use when deploying our powers to investigate and, where appropriate, to take enforcement action in respect of unacceptable behaviours or conduct.
- 1.6 We note that our expectations on Domestic Customers' needs, our expectations for ease of contact and our expectations for the operation of a supplier's enquiry service may change. The contents of this guidance document may therefore change over time, subject to consultation that will allow stakeholders time to provide views.
- 1.7 Whilst this guidance document is specifically focused on contact ease as a key driver of customer satisfaction, we ultimately want suppliers to provide good service to their customers across the board. We do not want suppliers to improve

contact ease at the expense of overall customer satisfaction (eg responding quickly, but not resolving queries).

- 1.8 This is why we will continue to monitor outcomes on customer service performance and evidence on customer satisfaction. We will ask suppliers to justify and explain their performance if we see that their overall performance is potentially non-compliant with the licence obligations or is otherwise poor, has been declining or is significantly lower than other licensees'. This includes cases where suppliers are demonstrating poor performance by the most basic threshold set by Citizens Advice as part of their Star rating (eg in relation to average call waiting times).
- 1.9 We expect the suppliers' boards to take full accountability for the service provided to their customers.

Outline of Supplier Contact ease obligations

- 1.10 Under SLC 0 'Treating Domestic Customers Fairly', suppliers have licence obligations to be easy to contact, have adequate customer service arrangements and to seek to identify and treat appropriately any Domestic Customer in a Vulnerable Situation. In addition, suppliers should use the Priority Service Register (PSR) to check if communications are in an accessible format and as far as is reasonably practicable, appropriate to the needs of customers in vulnerable situations (SLC 26.5 (e)).
- 1.11 Under SLC 0, suppliers are also required to ensure that customer service arrangements and processes are complete, thorough, fit for purpose and transparent. In addition, suppliers are required to ensure they have and maintain robust internal capability, systems and processes to enable the licensee to efficiently and effectively serve each of its Customers (SLC 4A).
- 1.12 Under SLC 31G 'Assistance and Advice information', suppliers are required to provide assistance and advice information to customers. This includes providing information that enables customers to quickly and easily understand how to contact the supplier and seek impartial advice from Citizens Advice.
- 1.13 In addition to the supply licence, legislation also places requirements on how suppliers engage with their customers (eg The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008 and the Equality Act 2010).
- 1.14 In relation to SLCs 31G.3A – 31G.3C, this guidance document aims to provide suppliers, customers and other interested parties, without being prescriptive, with:

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- Information on our current expectations for the operation of a supplier's enquiry service and ease of supplier contact.
 - Examples of different approaches that suppliers could take to deliver their licence obligations.
 - Examples of levels of performance that may prompt us to ask further questions about supplier performance.
- 1.15 This guidance is not intended to be exclusive and it will be open to suppliers to demonstrate that they are meeting customers' needs in other ways.
- 1.16 SLC 31G.3A requires suppliers to provide an enquiry service which satisfies the criteria set out. SLC 31G.3B and SLC 31G.3C set out aspects of how the enquiry service should operate. Limbs in SLC 31G.3A are cumulative as they represent the minimum that the suppliers' enquiry service must offer.

The structure of this guidance document

- 1.17 We consider that there are three components to making it easy for domestic customers to contact their supplier. This guidance outlines our expectations in relation to each of these components.
- 1. Finding methods of contacting suppliers:** Customers are able to identify methods of contacting their supplier easily and clearly.
 - 2. Method of contact meeting different customer needs:** All customers, in particular customers in vulnerable situations, are able to identify a method of contacting their energy supplier that meets their needs.
 - 3. Contacting suppliers and getting timely and appropriate responses:** All customers, in particular customers in vulnerable situations, are able to contact their supplier in a timely manner via their chosen contact method and get prompt query resolution.

1. Finding methods of contacting suppliers

Customers want and need to contact their energy supplier for various reasons. They may want to report a fault with their meter, query or seek support on their bill, arrange an appointment for a meter read, or crucially, they may be off supply and require urgent assistance.

It is critical that customers are able to contact their supplier easily.

Finding methods of contacting suppliers

Obligation

- 1.18 SLC 0.3 c) in relation to customer service arrangements: i. make it easy for a Domestic Customer to contact the licensee; iii. otherwise ensure that customer service arrangements and processes are complete, thorough, fit for purpose and transparent.
- 1.19 SLC 26.5 (e) Suppliers should use the PSR to check if communications are in an accessible format and, as far as is reasonably practicable, appropriate to the needs of customers in vulnerable situations.
- 1.20 SLC31G.1 The licensee must ensure that each Domestic Customer is provided with information in a Form and at a frequency that is sufficient to enable that Domestic Customer to quickly and easily understand how to:
- (a) identify and contact each Relevant Party about a problem, question or any other request for assistance. This includes queries, complaints, disputes or emergencies; and
 - (b) seek impartial advice from Citizens Advice consumer service.

Our expectations

- 1.21 We expect customers to be able to identify methods of contacting their suppliers easily and clearly. We expect customers to be able to easily find information on suppliers' contact methods, so that customers can choose the method that meets their needs.
- 1.22 We expect suppliers to ensure that enquiry service information is easy to find and prominently displayed on suppliers' websites (i.e., on, or one click away from, the homepage of their website), apps, and any written communication (eg on bills or statements of account) to the customers.
- 1.23 In particular, we would expect suppliers to consider the needs of domestic customers in vulnerable situations, including customers on the PSR (eg customers

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with a visual or hearing impairment or a customer with a learning disability) when ensuring that enquiry service information is easy to find.

- 1.24 We expect suppliers to regularly seek feedback from their customers about how to make it easy to find methods of contacting them, and to act on the feedback received.

2. Methods of contact meeting different customers' needs

We want customers, in particular Domestic Customers in Vulnerable Situations, to be able to identify a method of contacting their energy supplier that meets their needs.

Different methods of contact

Obligation

1.25 SLC 31G.3A The licensee must provide, or procure the provision of, an enquiry service than enables Domestic Customers to contact the licensee. As a minimum the enquiry service must (a) Offer a range of contact methods that meet the needs of the licensee's Domestic Customers, including those of its Domestic Customers in Vulnerable Situations.

Our expectations

1.26 We want customers, in particular Domestic Customers in Vulnerable Situations, to be able to identify a method of contacting their energy supplier that meets their needs. To reflect the diversity of different customers' communication needs, we would expect suppliers to provide a range of contact methods that reflect the needs of customers that:

- Are digitally excluded (eg a phonenumber).
- Find it easier to communicate digitally (eg digital methods of contact).
- Have special communication needs (eg customers with a visual or hearing impairment, or customers with a learning disability).

1.27 We would expect suppliers to continuously review the effectiveness of their contact methods, as appropriate, to ensure that the contact methods they have on offer continue to best meet their customers' needs.

Opening hours that meet customers' needs

Obligation

1.28 SLC 31G.3A [...] the [licensees'] enquiry service must (b) be available to receive enquiries and offer assistance, guidance, or advice at times that meet the needs of Domestic Customers, including those of Domestic Customers in Vulnerable Situations.

Our expectations

- 1.29 In complying with the obligation, suppliers should take actions to determine customers' needs. We would expect suppliers to take these into account in setting their opening hours. We would expect suppliers to be able to explain how they have achieved this.
- 1.30 For example, we would expect suppliers to take into account the needs of customers that are unable to engage between 09:00-17:00 Monday to Friday.² We may therefore ask a supplier to be able to justify and explain how their enquiry service's opening hours meet these customers' needs if we observe declining or poor customer service, and it is not open, via a range of contact methods, for a meaningful length of time outside this time period (eg based on current analysis, 2 hours a day outside 09:00-17:00 Monday-Friday or 7 hours in total over the weekend³).
- 1.31 To reflect the needs of Prepayment Meter (PPM) customers, we would also expect a supplier's opening hours to be coordinated with the times when a customer is eligible for friendly credit, so that the majority of PPM customers that run out of credit are able to either contact their supplier or are eligible for friendly credit. We acknowledge that some PPMs do not have the friendly non-disconnect function and that therefore this is not possible for these customers (eg traditional gas meters).
- 1.32 We recognise that opening hours may differ across different suppliers and across different contact methods, as these are tailored to specific customer's needs.
- 1.33 We would expect suppliers to continuously review their opening hours, as appropriate, to ensure that they are open at times that best meet their customers' needs.

Free to access for consumers that have, or will have, difficulty paying their energy bills

² Please see analysis in opening hours that meet customer needs assessment section in the July 2023 statutory consultation document, which can be found here: [Consumer Standards - Statutory Consultation | Ofgem](#). Note that the analysis only looked at whether suppliers offered forms of extended contact hours across different contact methods and did not indicate compliance with the policy.

³ These thresholds are derived from the opening hours that meet customer needs assessment section in the July 2023 statutory consultation. These thresholds are based on the bottom 20th percentile values of the maximum hours offered through any contact method by the suppliers included in the analysis, beyond the eight hours of 09:00-17:00 during the week and any hours on the weekend. Note, we excluded contact methods where it was not clear what the opening hours were, where we deemed the form of contact would not be covered by customer service representatives (eg a completely virtual assistant) and where our research indicated the method was labelled as 'emergency only'. Note that the analysis only looked at whether suppliers offered forms of extended contact hours across different contact methods and did not indicate compliance with the policy.

Obligation

- 1.34 SLC 31G.3C When providing the enquiry service, the licensee must implement appropriate processes to provide the enquiry service free of charge to Domestic Customers who are having or will have difficulty paying all or part of the Charges.

Our expectations

- 1.35 It is important that domestic customers that are currently struggling to pay their bills or will have difficulty paying their bills in the future, are able to contact their suppliers without there being a barrier to engagement and without incurring an additional financial detriment.
- 1.36 There are different approaches that a supplier could take to comply with this obligation. For example:
- Dedicated freephone numbers for Domestic Customers who are or will be struggling to pay their bills.
 - Provide a freephone number for a wider range of customers (eg all Domestic Customers in Vulnerable Situations). This would include Domestic Customers who are or will be struggling to pay their bills. However, it would not require the supplier to identify these specific customers.
 - A combination of these options.
- 1.37 In accordance with our licence conditions, suppliers must have contact methods that meet the needs of their customers. We would currently expect suppliers to provide the option of a free telephone line for customers who are or will be struggling to pay their bills. However, we acknowledge that some of these customers may choose to engage with their supplier via different free contact methods (eg some customers who are having or will have difficulty paying their energy bills may prefer to engage via an app or social media).
- 1.38 Under SLC 27, suppliers are already required to take all reasonable steps to ascertain the Domestic Customer's ability to pay and must take action when it becomes aware or has reason to believe that a Domestic Customer is having or will have difficulty paying all or part of their energy bills. We recognise that individual characteristics or circumstances can change over time. We would expect suppliers to take this into account as part of the design of any solution. We encourage suppliers to design their services to be as inclusive as possible, using services targeted at specific customers with particular needs or circumstances where appropriate.

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- 1.39 We note that the definition of customers “that are having or will have difficulty paying all or part of their energy bills” is purposefully broader than the “Domestic Customers which have been added to the Priority Services Register”, to reflect that some customers that struggle to pay their bills may not be on the PSR.
- 1.40 Eligible customers should be made aware of and directed to free methods of contact as soon as their supplier is aware of their eligibility.

3. Contacting suppliers and getting timely and appropriate response

All customers, in particular Domestic Customers in Vulnerable Situations, should be able to contact their supplier in a timely manner via a contact method that meets their needs, and receive prompt query resolution.

Call waiting times

Obligation

- 1.41 SLC 0.3 c) in relation to customer service arrangements: i. make it easy for a Domestic Customer to contact the licensee; iii. otherwise ensure that customer service arrangements and processes are complete, thorough, fit for purpose and transparent;

Our expectations

- 1.42 Being able to contact suppliers and getting a timely and appropriate response, is a critical part of a supplier being easy to contact and delivering good customer service.
- 1.43 Where an enquiry service is provided by phone, we want suppliers to answer the phone as quickly as possible.
- 1.44 Aligning with the most basic current threshold set by Citizens Advice as part of their Star rating for average call centre wait times⁴, we would expect a supplier to be able to justify and explain its level of performance if it took, significantly or consistently, longer than a monthly average of 5 minutes to answer phone calls.⁵ We may change our expectations in line with any changes in Citizens Advice basic threshold for average call centre wait times as part of their Star rating.
- 1.45 We recognise that call waiting times are driven by a range of factors (eg time of day, reason for call). Some customers may therefore wait longer or shorter than the average.
- 1.46 We recognise average call waiting times do not reflect the service received by “worst served customers”, and we will monitor supplier performance and engage where we consider that some of a supplier’s customers are not being responded

⁴ The methodology as set out by Citizens Advice at the time of publication of this guidance - [How the scores are worked out - Citizens Advice](#)

⁵ The average for call wait time is calculated as a median value per calendar month in the format HH:MM:SS. The figure does not involve any time spent on Interactive Voice Response (IVR) up until the point 'talking to an agent' is chosen.

to in a timely manner. We may look to provide further guidance on our expectations in relation to this.

- 1.47 We want suppliers to minimise the number of abandoned calls. We may look to provide further guidance on our expectations in relation to this.
- 1.48 We acknowledge that many enquiries are received via other contact methods. We would expect a supplier to be able to justify and explain if it fell, significantly or consistently, below the basic thresholds set by Citizens Advice as part of their Star rating, for responding to alternative methods of contact methods (eg responding to less than 40% of emails within 2 working days).
- 1.49 As consumers' expectations change, our expectations may equally change. As we gather more data on customer experience, we may also look to provide guidance on our expectations.

Prioritising vulnerable consumers and representatives acting in the interest of and on behalf of a Domestic Customer in a Vulnerable Situation

Obligation

- 1.50 SLC 31G.3B When providing the enquiry service, the licensee must implement appropriate processes to prioritise enquiries from:
- a) Domestic Customers in Vulnerable Situations who, due to their circumstances or characteristics, may require immediate assistance, guidance or advice;
 - b) Any representatives acting on behalf and in the interest of a Domestic Customer in a Vulnerable Situation who, due to their circumstances or characteristics, may require immediate assistance, guidance or advice.

Our expectations

- 1.51 Suppliers already have existing licence obligations to identify (eg SLC 0.3 d)) and serve the needs of Customers in Vulnerable Situations (eg SLC 26).
- 1.52 With SLC 31G.3B our expectation is for a supplier's enquiry service to be able to identify and prioritise domestic customers in vulnerable situations who may require immediate assistance, based on their characteristics or circumstances or representatives acting on their behalf and in their interest. This obligation aims to prevent harm to Domestic Customers in Vulnerable Situations.
- 1.53 We would expect a supplier to take into account a customer's circumstances and characteristics when determining who to prioritise. Ofgem's Consumer

Vulnerability Strategy 2025⁶ also contains some guidance for suppliers on customer characteristics and circumstances.

1.54 Non-exhaustive examples of the characteristics and circumstances that could prompt a supplier to provide immediate assistance, guidance or support include:

- Customers that are off-supply, or may soon be off-supply, due to the customer running out of credit on their pre-payment meters.
- Customers whose characteristics or circumstances mean that their health could be significantly harmed if they are not provided with immediate assistance, guidance or support.

1.55 We recognise that vulnerability is transient and that an individual's characteristics or circumstances can change over time. We consider that suppliers should take this into account when seeking to identify these customers.

1.56 There are different approaches that suppliers could use to help implement this requirement. For example:

- Suppliers could ask customers to provide information on their characteristics or circumstances, and then prioritise their enquiries accordingly. For example, suppliers could triage calls to their phonenumber based on information provided by the customer (eg "press 1 if you are seeking help because you are struggling to pay your bills").
- Alternatively, suppliers could seek to use data and analytics to identify and prioritise enquiries from Domestic Customers in Vulnerable Situations that may require immediate assistance, guidance or advice. For example, this could be done by prioritising enquiries from telephone numbers/emails linked to accounts that are on their PSR register or filtering emails to identify those that contain key words that may signal that a Domestic Customer is in a Vulnerable Situation and requires immediate assistance, guidance or advice (eg "emergency").
- Suppliers should train agents to identify signs of vulnerability. For example, this could be through prioritising enquiries/emails where the supplier identifies relevant risk factors that may indicate that a Domestic Customer is in a Vulnerable Situation and require immediate assistance, guidance or advice. Suppliers should be mindful that their customers will not always proactively indicate that they are vulnerable or self-identify as such.
- Suppliers could use a combination of different approaches.

⁶ In line with Ofgem Vulnerability Strategy - [Consumer Vulnerability Strategy 2025 | Ofgem](#)

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- 1.57 We know that many Domestic Customers in Vulnerable Situations do not self-identify as being 'vulnerable'. We would therefore expect suppliers to design any services targeted specifically at Domestic Customers in Vulnerable Situations to focus more on a customer's characteristics or circumstances.
- 1.58 We would expect suppliers to have processes in place to easily facilitate a person or organisation contacting a supplier in the interest of and on behalf of a Domestic Customer in a Vulnerable Situation. This includes but is not limited to advice or welfare rights organisations (eg customer support and debt advice organisations), professionals such as social workers, community nurses or doctors, as well as family members or friends. Suppliers should have processes to identify and prioritise enquiries from representatives contacting them on behalf of Domestic Customers in Vulnerable Situations that require immediate assistance.
- 1.59 We recognise that whilst suppliers may have appropriate processes to identify domestic customers that require immediate assistance, these processes may not always identify all customers that require immediate assistance (eg if customers are unwilling to share information on their characteristics/circumstances or suppliers lack data on these customers).