

Jemma Baker  
Future Retail Markets

**Electricity North West**  
Hartington Road, Preston,  
Lancashire, PR1 8AF

**Power cut? Call 105**  
General enquiries: 0800 195 4141  
Email: [enquiries@enwl.co.uk](mailto:enquiries@enwl.co.uk)  
Web: [www.enwl.co.uk](http://www.enwl.co.uk)

Via email to [RetailStakeholderTeam@ofgem.gov.uk](mailto:RetailStakeholderTeam@ofgem.gov.uk)

Direct line: 07740 765495

Email: [Samantha.Louckes@enwl.co.uk](mailto:Samantha.Louckes@enwl.co.uk)

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Dear Jemma

### **Consumer standards statutory consultation**

Thank you for the opportunity to respond to the Consumer standards statutory consultation. We welcome Ofgem's timely consultation and proposed modifications to support energy customers in accessing help when they need it. Providing customers with good customer service is critical and customers should expect their supplier to be easy to contact and to provide them with appropriate assistance.

We fully support the Ofgem proposals to ensure customers are able to contact their supplier easily and to identify and support consumers that are struggling with their bills. We are particularly pleased that Ofgem is proposing to require suppliers to be open 24/7 for customers who have lost power or gas due to issues related to their metering or other supplier equipment.

During your initial consultation, Electricity North West raised concerns that customers were experiencing different levels of service following a loss of power from a metering fault compared to the level of service provided following a network fault. We identified and shared evidence-based data of our receiving regular and continuous calls from customers who were unable to contact their supplier to report a meter fault, over a prolonged period of time with a resultant delay restoring the electricity supply to their property. This issue was exasperated during bank holiday weekends (e.g. easter holidays). We initially raised this issue through the electricity Distribution Connection and Use of System Agreement (DCUSA) Standing Issues Group and subsequently raised a formal change request through the dual fuel Retail Energy Code in July 2022 to ensure both gas and electricity customers benefitted from the proposed change. A significant amount of work has been completed via working groups to collect comparable information to identify and understand the scale of the issue across fuels, meter types and localities. We are pleased that Ofgem has used this data to inform its decision which will improve service for all customers, but particularly to those who can be placed in vulnerable situations because of a loss of supply resulting from a problem with their meter and their inability to contact their supplier to enable a meter fix and the restoration of their power.

Industry parties, consumer groups and Ofgem have noted that there are inconsistencies between the levels of service provided by different parts of, what customers view as, "one sector". Electricity and Gas network operators provide 24/7 telephone and response services to support customers when they experience a distribution issue. Few suppliers offer an equivalent level of service, resulting in



customers contacting their network company (either by direction from their supplier's messaging whilst they are closed or via Powercut 105 for electricity or National Gas Helpline for gas). We strive to support our customers as best we can in these circumstances, but network parties are often unable to provide the specific level of support for many supplier-led activities. Whilst we have taken innovative steps ourselves (including issuing prepayment top up cards for customers or issuing food vouchers), suppliers are often far better placed, and sometimes the only party able, to support their customers in some supply related situations (e.g., a faulty meter).

Some stakeholders have observed concerns around the cost of suppliers providing an out of hours service. Whilst some cost is likely, we are convinced that the consumer detriment of being without power for extended periods is significant and the inability to make contact with the supplier to discuss the issue and progress resolution increases that detriment. A large number of customers each year face hours, sometimes days of no electricity in their homes due meter related issues that have occurred over evenings, weekends and bank holidays.

Innovative ways of providing services are very much business as usual for many organisations in the modern digitally enabled economy. Our view is that suppliers needing to provide meter related services at weekends as response to faults can be done efficiently and may present a range of other opportunities for suppliers to deliver consumer benefits to their customers.

Electricity network operators have rightly seen the power restoration targets for customers set more stringently in the RIIO-ED2 price control which has just commenced. Our customers rate reliable supplies as one of their top priorities. As we move towards Net Zero and an increased reliance on electricity as an energy source, it is not just vulnerable customers who will become to rely on a quick and effective response from both distributors and suppliers when there is a loss of power. As previously stated, customers should reasonably expect that a high performance to address a loss of power would be uniformly applied across the sector, including where these are caused by the supplier's meter. We therefore fully support these Ofgem proposals and the aims of REC0053 - 24/7 Emergency Metering Service.

Yours sincerely

**Samantha Loukes**

Customer Vulnerability Inclusion Manager