

Question 1: Do you have any comments or questions on our proposed licence changes to improve supplier contact ease?

Regarding proposed SLC 31G.3A(c), we strongly agree with the “24/7 enquiry service” point made in Energy UK’s 23 August response: *“There are different understandings of the scope of the 24/7 enquiry service, and whether this is proposed for meter fault issues, rather than, for example, consumers not topping up their PPM meters.”* We urge Ofgem to better define the issues it intends to be covered by this SLC, so suppliers can fully understand what it is expected of them. We also believe that a cross-industry solution to Ofgem’s 24/7 emergency service requirement would be simpler and more cost-effective for customers.

Regarding proposed SLC 31G.3C (provide the enquiry service free-of-charge), we believe Ofgem’s policy intention is to protect customers in financial difficulty from additional costs. We believe the SLC would better achieve this by specifying “customers in financial difficulty” instead of “customers in vulnerable situations”.

Question 2: Do you have any comments or views on our proposed contact ease guidance document? We would welcome evidence of ways in which suppliers are already delivering best practice.

We are concerned that the Guidance Document includes elements of good practice and elements of enforceable expectations and that suppliers may be unable to consistently differentiate between these elements.

In the consultation document, Ofgem states (1.28) *“As customers’ needs change, our expectations are also likely to evolve”*. We are concerned that the guidance may change over time, with new expectations added, without the necessary consultation and Impact Assessment which would ensure these are in the best interests of customers and correctly recognised within supplier costs. Where Ofgem intend to use the Guidance Document as an enforceable set of expectations, changes should follow the same level of consultation and Impact Assessment as changes to the Supply Licence.

Guidance states: *“We do not expect suppliers to provide a 24/7 enquiry service for all customers.”* However, it also states: *“Customers should be able to easily find information on all suppliers’ contact methods so they can choose the method that best meets their needs”* and *“Enquiry Service information is easy to find and prominently displayed on; websites (on, or one click away from, home page); app; any written communication (e.g. bills or annual statements)”*. We believe this guidance is contradictory. Any number displayed in the way that is required by this guidance will be available for all customers. We would suggest that guidance should specify that any freephone number can, if suppliers require this, be included only within communications to customers in financial difficulty. This would help to avoid the above contradiction and ensure the number is used by those customers who are in greatest need of a freephone service.

Proposed SLC 31G.3B requires that suppliers identify and prioritise customers in vulnerable situations. Guidance states that suppliers should not just assume that a customer is not in a vulnerable situation based on previous engagement. Our call routing system currently includes an element of prioritisation based upon the customer’s PSR categories, which have been updated through previous engagement. We believe that this system works well in getting the fastest support to those customers who are likely to need it. We are concerned that the new guidance does not

support these best attempts at prioritisation and that a replacement 'IVR button pressing system' may be more open to misuse and therefore lead to less effective prioritisation. We would welcome Ofgem's views on this.

Question 3: Do you have any comment or questions on our proposed licence changes to better support customers struggling with their bills?

We have no comments or questions on the proposed licence changes to better support customers struggling with their bills.

Question 4: Do you have any comments or questions on our proposed licence changes to require suppliers to publish information on their customer service performance, as measured by Citizens Advice?

We have no comments or questions on the proposed licence changes to require suppliers to publish information on their customer service performance, as measured by Citizens Advice.

Question 5: Could you provide any further, detailed evidence on the potential costs and benefits of our revised proposals?

We are concerned that Ofgem have not conducted an impact assessment in relation to these proposals. We believe there is a high likelihood that the ongoing costs of delivering these proposals will be material and it is important for Ofgem and industry to ensure this represents value for money for customers.

We have provided below our estimate of Utilita's ongoing cost of complying with 31G.3A.

Detail redacted for non-confidential response.

We believe Ofgem should complete a properly quantified, robust Impact Assessment (IA) to ensure that any proposals for a set of new standards achieve value for money and add real consumer benefit. The IA should encompass the suite of proposals Ofgem are looking to introduce and ensure that the proposals are properly quantified and tested against the "do nothing" counterfactual and against an alternative, cross-industry 24/7 solution.

If Ofgem consider that the 24/7 service should not extend to arranging out-of-hours engineer visits, as Ofgem has suggested within industry meetings, Ofgem should make this explicit in the licence condition and/or guidance around this. This would provide greater clarity for suppliers creating procedures to comply with these changes.

Question 6: Could you provide detailed evidence or information on the proposed timescales for implementation of our revised proposals?

We agree with the Energy UK view that an expected implementation for winter 2023/24 is unrealistic considering that systems changes, staff recruitment and contract changes will necessarily take longer than eight weeks. A rushed implementation risks adding additional costs and increases the potential for poor customer outcomes.