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Ofgem  
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Dear Jemma,

Thank you for the opportunity to respond to your statutory consultation on consumer standards published on 26 July 2023. As you are aware Energy Networks Association (ENA) is the industry body representing the UK's electricity and gas transmission and distribution network operators. This response sets out a collective view from ENA members. Some ENA member companies may additionally respond individually to the consultation.

This consultation response sets out our support of Ofgem's proposals to ensure customers are able to contact their supplier easily and to identify and support consumers when they are experiencing issues with their equipment. 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. We are keen to understand how this will work in practice. Our view is that the solution should not be over-engineered as this risks delaying the implementation and consequential customer benefits. Ownership of the solution that is implemented must sit with suppliers as it is their customers who are experiencing issues with their supplier owned equipment.

As we have stated in our response to Ofgem's consultation on options to address priority customer service issues, and on the introduction of a new consumer standards framework, the issue is in two parts: a lack of information or understanding of what the 105 service and the gas emergency line are for, with misleading information provided on supplier websites; and customers having difficulty contacting their suppliers, which then leads them to contact their DNO or the gas emergency line.

This means that the solution is also two-fold:

- clear communication on supplier websites and printed communications (i.e. bills) regarding what an emergency is; and
- suppliers to be available to answer customer contacts and resolve the customer issues when they have the issue rather than waiting until the next working day (which might be multiple days later).

Electricity distribution network operators (DNOs) and gas distribution networks (GDNs) are engaging with suppliers to support and encourage them to make changes to their websites. In the gas sector, Cadent have held workshops with other GDNs, Ofgem, HSE, Suppliers and Energy UK. A joint action plan has been created, which includes producing common collateral on the definition of a gas emergency and where and how the 0800 number should be advertised to ensure consistency in communications; and establishing a collaborative forum between call centres to plan and share information on a more frequent basis. DNOs and GDNs are also working to provide additional data around customer calls related to supplier issues to help demonstrate the scale of these issues.

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DNOs and GDNs have shared concerns that customers are 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. DNOs initially raised this issue through the electricity Distribution Connection and Use of System Agreement (DCUSA) Standing Issues Group. To ensure both gas and electricity customers benefit, ENWL subsequently raised a formal change request through the dual fuel Retail Energy Code in July 2022.

DNOs and GDNs support an explicit obligation in line with that in 31G.3A(c). This is a key customer service obligation which needs to be explicit and not left to a principles based condition where suppliers could interpret their obligations in different ways and revert to a non 24/7/365 solution as has been proposed by Energy UK.

The licence conditions should also be more explicit on what service media should be, for example phone only, mindful of suppliers concerns over different channels raised on industry calls during August. DNOs and GDNs recommend that a licence condition has minimum standards for service delivery.

The costs to deliver the solution are between Ofgem and suppliers to determine as to whether they fall within the cap but regardless of this, the solution needs to be enduring.

The reluctance displayed by some suppliers in transitioning to a 24/7/365 service approach is disheartening and contributes to the erosion of consumer standards in the industry. While some stakeholders have raised concern over the costs of providing such a service, we believe that while an increased cost is likely, it is in the interest of fair service for consumers to provide this service. Practical and cost-effective measures, such as enabling contact centre team members to work remotely, can facilitate the provision of these vital services. Customers should be able to expect a uniform minimum response across the sector to address a loss of electricity or gas.

Members look forward to working with Ofgem and suppliers to ensure a cost effective and workable solution is promptly implemented to provide customers the high levels of customer service they expect.

A handwritten signature in black ink, appearing to read 'Paul McGimpsey', is positioned above the printed name.

Paul McGimpsey  
Director of Markets and Regulation