

Ayena Gupta
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

5 October 2023

Dear Ayena

Supplier Guaranteed Standards of Performance for Switching: Consultation on amending Guaranteed Standard 6ZA

We welcome the opportunity to respond to the above consultation seeking views on proposed amendments to the Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015. The proposals relate to Guaranteed Standard (GS) 6ZA, which sets a standard for timescales for completing a customer transfer. Ofgem is consulting on changes to the Statutory Instrument (SI) text for GS 6ZA to reflect the faster switching requirements which came into effect in July 2022.

We agree with Ofgem that it should make the proposed amendments to the requirements for GS 6ZA. We agree that the proposed amendments will continue to ensure appropriate compensation is paid to consumers for detriment suffered as a result of a delayed switch.

We set out answers to the specific questions in the consultation document in the enclosed Annex 1. Should you wish to discuss further or have any questions please contact me or Rhona Peat (rhona.peat@scottishpower.com).

Yours sincerely,



Richard Sweet
Director of Regulatory Policy

**SUPPLIER GUARANTEED STANDARDS OF PERFORMANCE FOR SWITCHING:
CONSULTATION ON AMENDING GUARANTEED STANDARD 6ZA –
SCOTTISHPOWER RESPONSE**

Question 1: Do you agree that there is a need to amend Guaranteed Standard of Performance 6ZA in order to achieve closer alignment with electricity and gas supplier SLC 14A following the introduction of the new faster switching arrangements?

Yes, we agree that GS 6ZA should be amended following the modification of the supply licence conditions in July 2022 to reflect the faster switching requirements made as part of the Switching Programme.

Question 2: Do you agree that our proposed drafting at Appendix 2 would bring Guaranteed Standard of Performance 6ZA into sufficiently closer alignment with electricity and gas supplier SLC 14A?

We believe that the proposed amendments will closely align the Guaranteed Standard 6ZA with the updated supplier SLC 14A requirements regarding the switch speed.

Question 3: In light of electricity and gas supplier SLC 14A having been amended in July 2022 following the introduction of the new faster switching arrangements, do you consider that any other Guaranteed Standard of Performance (other than 6ZA) requires to be amended?

We do not have any suggestions for further amendments to any Guaranteed Standard other than GS 6ZA.

ScottishPower
October 2023