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Domestic Retail Policy Team.
Office of Gas and Electricity Markets
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Canary Wharf
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FutureConsumers@ofgem.gov.uk

20th December 2024

Dear Jemma,

Wales & West Utilities (WWU) response Statutory Consultation on Consumer Standards – 24/7 Metering Support

Thank you for the opportunity to respond to this consultation. WWU is a gas transporter serving 2.5 million supply points in Wales and south-west England. This response is not confidential and may be published by Ofgem.

We are only responding to the questions related to the activation of the supplier licence condition and not to the questions on the Contact Ease guidance.

- 1) Do you agree with our proposal to activate supplier SLC 31G.3A(c) in order to meet our desired outcome for consumers?

Yes, WWU supports the activation of this licence condition. As provider of the emergency service for Public Reported gas Escapes in our operational area, we consider it essential the 0800 111 999 gas emergency number is kept for use for emergencies and not used by frustrated customers to report metering faults due to suppliers not providing out of hours customer support for such faults. We recognise that some suppliers have made progress in improving customer support, but this is far from universal and therefore this licence condition needs to be turned on. We note that the proposal is to activate it on 1st April 2025 which will be after the end of the winter so there is a risk to the emergency call centre during this winter and we urge Ofgem to encourage suppliers to implement incremental improvements to their customer support over the winter. While suppliers may not be able to provide the full service until 1st April we would expect to see some improvements well before the end of the winter.

We recognise that the minimum requirement includes services to vulnerable domestic customers as well as metering related enquiries for all domestic customers, and these are probably the main reasons why customers need to contact their Suppliers out of working hours, they are not the only reasons. While the licence

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condition may address key concerns, the minimum requirements could be expanded to cover other urgent requirements.

We have the following additional comments.

- a) The consultation states: "There has been insufficient progress by industry parties in developing this solution since our decision in October 2023 and the issue for consumers remains unresolved". Our view is that this reference to industry parties refers to Suppliers who are responsible for meeting the customer service requirements of their customers. Metering became a Supplier responsibility 20 years ago and it is clearly for Suppliers, either individually or collectively, to ensure that they provide appropriate call centres facilities for their customers. Although network have a National Gas Emergency call centre run by Cadent that provides services to other transporters under contract there should be no assumption that networks should provide services to Suppliers.
 - b) It is important that Suppliers and Networks work together to ensure that calls are passed between us. For example, a Supplier call centre receiving a call about a gas escape must ensure that it is passed on to the Gas Emergency number 0800 111 999 and Suppliers should notify the National Gas Emergency call centre of contact numbers so that customers can be told what number to call for Supplier customer service enquires.
- 2) Are there any further issues with implementation that we have not considered in this consultation? Please provide any relevant information to evidence the issues.
- No response.
- 3) Do you have any comments on the draft Impact Assessment published alongside this document, including the costs and benefits, competition impacts, and unintended consequences?

We note that the licence drafting shown is from an electricity licence and therefore refers to electricity. For completeness it would have been sensible to have included "electricity/gas" in the drafting or a note stating that the wording would state gas in the gas Supplier licence.

Yours sincerely,



Richard Pomroy
Regulation Manager
Wales & West Utilities