

Steve Kirkwood
10 South Colonnade
Canary Wharf
London
E14 4PU
By email to FutureConsumers@ofgem.gov.uk

20 December 2024

Dear Steve,

SSEN Distribution response: Consumer Standards – 24/7 Metering Support Statutory Consultation

SSEN Distribution welcomes the opportunity to respond to Ofgem's statutory consultation on the Consumer Standards – 24/7 Metering Support. SSEN Distribution is the trading name of Scottish Hydro Electrical Power Distribution plc and Southern Electric Power Distribution plc. This response is being submitted on behalf of those licensees.

With a Distribution Network which reaches to over 3.9 million households and businesses in the North of Scotland and Central Southern England, we are seeking to power our communities to net zero. We welcome initiatives that seek to improve the general levels of service and the standards that customers receive.

We are supportive of Ofgem's proposal to activate the currently dormant supplier licence condition that would require all domestic suppliers' enquiry services to be available 24/7 for customers with an interruption in their supply of electricity or gas due to meter faults. As detailed in our responses (May 2023 and August 2023) to Ofgem's previous related consultations, we consider that it is in the best interests of customers for them to be able to contact their supplier directly when they are experiencing an interruption to their power due to a supplier related issue. This is because they are the relevant party who is responsible for the equipment, and therefore able to resolve the problem that their customer may be experiencing. As noted within Ofgem's statutory consultation, this is also the most cost effective resolution for customers, which we think is supported by the information we shared with Ofgem as part of our response to Ofgem's Request for Information to DNOs and GDNs in August 2024. We welcome the positive change that this will bring for supplier customers, especially over evening and weekends.

We will continue to work with Suppliers to ensure customers have a clear understanding of which organisation they need to contact and how, and that the relevant contact information is clear and easy to find. We will also continue to support customers who have rung us in error, providing them with support and advice and directing them to their supplier when it is a metering fault.

We have included our responses to the questions that Ofgem has raised in Annex A below. If you have any questions in relation our response, please do not hesitate to get in touch. This response is not confidential.

Yours sincerely,

Rose Tresidder
Regulation Manager, SSEN Distribution

Annex A

Q1. Do you agree with our proposal to activate supplier SLC 31G.3A(c) in order to meet our desired outcome for consumers?

Yes.

Q2. 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.

Q3. 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 support Ofgem's assessment of this proposal providing the best outcome for customers of suppliers, in relation to both cost efficiency and customer resolutions.

Q4. Does the guidance provide sufficient clarity for suppliers, consumers and their representatives on Ofgem's expectations and consumer outcomes?

Yes, we think the guidance provides sufficient clarity. In particular, in our previous response to Ofgem we have highlighted the importance of suppliers utilising staff who are appropriately trained to deal with customer meter related issues over the phone. From the outcomes that Ofgem has detailed, we consider there is sufficient clarity to address that point, specifically:

"The supplier is available to receive enquiries from customers off-supply due to meter faults, to triage what might be causing the interruption in supply and determine if it is urgent. We would expect the supplier to offer assistance, guidance or advice to resolve the issue at the time of the enquiry where this is possible, or at the earliest opportunity."¹

We are conscious that the licence condition is focussed on requiring suppliers to provide an "enquiry services to be available 24/7 for customers off-supply due to meter faults to provide immediate assistance, guidance or advice."² To address concerns around customers in vulnerable situations in particular, we consider it is important that Ofgem puts appropriate emphasis on the requirement for suppliers to provide immediate assistance. The current licence condition does not reference increased standards for meter operatives to attend a customer's property, and we consider this leaves a large gap for customers who are off-supply due to meter faults.

¹ p. 6, [Consumer Standards - 24-7 Metering Support statutory consultation](#), 14 November 2024

² p.5, [Consumer Standards - 24-7 Metering Support statutory consultation](#), 14 November 2024