

**By email**

20<sup>th</sup> December 2024

Dear Mr Kirkwood

**Consumer Standards - Supplier 24-7 Metering Support statutory consultation**

I am writing to offer feedback on Ofgem's statutory consultation regarding the activation of the dormant standard licence condition (SLC) 31G.3A(c), which mandates suppliers to provide a 24/7 enquiry service for domestic customers experiencing electricity interruptions due to metering faults. As noted in the response submitted by the Energy Networks Association, this is Northern Powergrid's individual response to the consultation.

Our responses to the specific questions you pose as part of the consultation process are set out below.

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

Yes, Northern Powergrid supports the proposal to activate supplier SLC 31G.3A(c), as it seeks to improve outcomes for consumers and demonstrates a positive step towards ensuring that consumers receive timely support from suppliers, especially in situations where they are without electricity due to metering faults.

**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.**

One issue that should be considered is the handling of metering faults reported out-of-hours. The current drafting of the consultation paper states that the dormant supply licence condition does not impose any additional obligations on suppliers to address metering faults outside of regular working hours, nor does it make this an explicit expectation in the associated guidance i.e. whilst suppliers being required to provide a 24/7 enquiry service would mean that at least some customers would, potentially, be given an engineer/metering appointment (and have their supply restored) at an earlier time, the impact assessment also highlights the assumption that there will be no change in the hours during which the supplier makes engineer/metering appointments available.

This could result in a disparity between the speed of resolution for customers reporting metering faults out-of-hours compared to those reporting them within regular working hours and raises the risk that urgent calls will still be directed to network operators for resolution. If suppliers are not required to address these issues directly, the intended benefits for consumers might not be fully realised.

**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?**

While we support the activation of SLC 31G.3A(c), it is important to consider the potential unintended consequences highlighted in the draft Impact Assessment. Specifically, the lack of obligation for suppliers to attend site and resolve metering faults out of hours could lead to inconsistent service levels and potentially undermine the intended consumer benefits.

In conclusion we are supportive of your proposal and look forward to its implementation.

NORTHERN POWERGRID

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Thank you for considering our feedback.

Yours sincerely

A handwritten signature in black ink, appearing to read 'L. Lowes'. The signature is written in a cursive, flowing style.

**Louise Lowes**  
**Director of Customer Service**

Copy: John Elliott, Head of Regulatory Compliance  
Ross Broadbent, Reporting and Insight Manager