

Future Consumers Team

Ofgem

10 South Colonnade

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E14 4PU

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Dear Future Consumers Team,

Thank you for the opportunity to provide feedback on the consultation regarding 24/7 Metering Support.

We have thoroughly reviewed and analysed the consultation and accompanying documentation, and we appreciate the positive changes aimed at improving the market. However, we oppose this particular change due to the complexities it will introduce across the industry.

While we recognise that this proposal may bring benefits, we believe it also presents risks, challenges, and implications for all parties involved, including consumers.

Please find below our concise response, outlining the concerns we are raising regarding this proposal. We encourage Ofgem to carefully consider the risks, challenges, and overall complexities associated with implementing this change.

Should you have any questions or wish to discuss any of the points highlighted in our response, we would be keen to engage further.

Yours sincerely,

Antonis Lamaj,

Energy Regulation & Compliance Manager

A handwritten signature in black ink, appearing to read "Antonis Lamaj", with a stylized flourish at the end.

1. Do you have any comments about the overall consultation?

We are supportive of the actions being taken to improve the market and have responded to the 'Innovation in the Energy Retail Market' consultation, sharing our views. We encourage Ofgem to review these contributions. However, with regard to the specific proposals in the consultation, we are opposed due to the complexities and costs they would introduce to the industry. Furthermore, we believe that we are not the most appropriate market stakeholder to implement this proposal.

In general, the proposal would impose additional regulatory requirements, increasing costs and administrative burdens for suppliers. This would hinder our ability to deliver innovative services and products, redirecting our focus to an already overburdened compliance and reporting framework for Ofgem.

We believe that other, more suitable and established stakeholders are better positioned to lead this change. As a result, the proposal would require suppliers, including ourselves, to recruit additional staff to manage both the new requirements and the other challenges we are already facing, all of which present barriers to innovation.

Below, we outline some of the negative impacts this proposal may have on suppliers:

a. Higher Operational Costs

Implementing 24/7 support will result in significant operational expenses for us. We question whether Ofgem has appropriately costed the impacts of the proposal across all suppliers businesses as scale will have a direct impact on cost meaning smaller suppliers are disadvantaged and a further barrier to entry is put up. The costs would need to be built into the price cap in a fair manner, and time would have to be given for them to be built into fixed term contracts. Establishing such a system will require us a substantial investment across several areas:

- i. **Staffing and Training:** Maintaining a 24/7-hour service demands additional staff, particularly for night shifts, weekends and public holidays. These roles often come with higher wages due to unsocial hours, further increasing costs. Additionally, staff must be adequately trained to handle technical issues, ensuring a consistent and effective response to customer needs. The alternative is that Ofgem is pushing us towards 'off-shoring' workforce which would need significant changes to our business model and practices.
- ii. **Technology and Infrastructure:** A new technological framework or updates to the existing one will be required, including call centres, automated

systems, and communication tools, to deliver 24/7 support effectively. Developing and maintaining these systems will impose a considerable financial strain on us. On the other hand, while some suppliers may consider collaborating with existing call centres abroad to reduce costs, this approach increases the risk associated with transferring customer data across different countries, raising concerns about data security.

- iii. **Specialised Teams for Off-Supply Issues:** To address off-supply situations promptly, we may need to establish specialised and well-equipped teams capable of resolving complex problems. These teams must be readily available at all times, which will further increase the operational burden for us. The costs associated with assembling, training, and retaining such teams will be substantial, especially if the frequency of incidents rises.

The factors mentioned above contribute to operational costs and will impact the financial viability, particularly smaller players in the industry, potentially making it harder for them to compete. This could also lead to higher costs for consumers. We believe the proposal lacks a clear and balanced funding strategy, placing the burden solely on energy suppliers. As a result, this approach will create additional challenges and risks while also imposing an unsustainable financial burden across the industry.

b. Complexity in Management

Establishing and managing 24/7 support will add further complexities to those already existing, particularly in situations where meter faults are widespread or recurring.

Meter faults can range from minor technical issues to critical off-supply incidents that demand immediate action. To address this variation, a tiered support system may be required, one that can prioritise and resolve issues based on their urgency. Implementing such a system necessitates additional processes, staff training, and potentially new technology, all of which contribute to the added complexity and costs.

Ultimately, the increased complexity could place a strain on both human and technological resources, potentially leading to service quality gaps and decreased customer satisfaction. We encourage Ofgem to carefully plan and consider the difficulties and complexity in management sustaining an effective 24/7 support while ensuring a positive customer experience.

c. Potential RFIs

In addition to the complexities mentioned above, there may be another RFI required by Ofgem to monitor cases of emergencies, etc. This further increases the administrative burden on our operations. We encourage Ofgem to consider a more innovative reporting framework, as the current system is extremely overwhelmed. As a supplier, we find ourselves dedicating more resources to reporting to Ofgem rather than focusing on delivering innovative services and products and driving overall market innovation.

2. Do you have any comments about the overall consultation?

While we understand the purpose of the consultation and the overall benefits it aims to bring to consumers, we have concerns regarding the timing of the consultation. We have consistently raised issues around overregulation, which can lead to outcomes contrary to Ofgem's expectations.

As we have stated in all our responses, we support actions that aim to improve the market, however, this specific proposal would introduce additional complexities for suppliers, diverting their focus from the innovative products and services they need to develop.

We question the need for 24/7 support. Around the clock support is already provided through our metering agent(s) to resolve meter problems, and we believe most suppliers will be in the same position. We therefore believe this consultation is focused on customers without the funds to top up PPM meters, or those customers wishing to discuss debt on their account. In response we would say that we have non disablement calendars (NDC's) set on our PPM meters to ensure customers do not disconnect due to lack of funds outside our current office hours, and in extremis our metering agent is instructed to change any PPM for a credit meter should an issue occur with this NDC. Our staff are available to assist customers wishing to discuss debt 8am – 8pm, weekdays and 9am – 1pm weekends giving ample time for customers to make contact. Our call waiting time averages at under 20 seconds and our email response time is well within Ofgem expectations.

We acknowledge that the optics of this consultation proposal may appear favourable for energy consumers, however, as outlined in this response and our previous correspondence, we believe these proposals would be sparsely used, and would lead to increased costs for all energy suppliers. This outcome would not align with the principle of protecting energy consumers.

Therefore, we encourage Ofgem to consider more innovative and centralised solutions, rather than implementing this overly complex proposal.

3. Do you have any comments about its tone and content?

After thoroughly reviewing the consultation, it is evident that further refinement is necessary. Both the tone and the proposals lack sufficient clarity, making it difficult for some industry stakeholders or energy consumers to fully understand the intent and scope of the consultation. This has been an ongoing issue with Ofgem's approach, and based on the outcomes of previous consultations, it seems there has been a lack of clear and consistent communication.

We encourage Ofgem to adopt a more straightforward, accessible, and transparent tone in future consultations to facilitate effective collaboration. This will help ensure that all stakeholders—whether industry members, involved parties, or energy consumers—can more easily grasp the consultation's objectives and the scope of the proposals. The language should be clear, concise, and free of ambiguity, allowing for a better understanding of the proposal's purpose across all audiences.

Moreover, it is essential that Ofgem sets clear, unambiguous expectations within the consultation documents. Language that is open to interpretation can lead to confusion and misalignment among members of the industry. To promote transparency and enhance the consultation process, it is important that Ofgem's communications are consistent and that expectations are clearly defined. This approach will not only improve the consultation process but also support the broader goal of fostering a more flexible and effective energy market.

4. Was it easy to read and understand? Or could it have been better written?

We believe that Question 4 could be combined with Question 3, as both essentially have the same meaning. Consequently, our response here mirrors our answer to Question 3.

To clarify our position, as an energy supplier with over 20 years of experience, we encounter no difficulties in reading or understanding the consultation, its accompanying documentation, or other communications and proposals from Ofgem. We have the necessary resources to fully interpret and understand the scope and details of the consultation and its proposals.

Therefore, we encourage Ofgem to adopt a clearer, more accessible, and transparent tone in future consultations. This approach will foster effective collaboration and benefit all stakeholders in the energy sector, including energy consumers, particularly those most in need.

5. Were its conclusions balanced?

100Green supports actions aimed at improving the energy market. However, we believe that the proposals outlined in this consultation are not well-suited for energy suppliers. Instead, these initiatives could be more effectively implemented by other, more appropriate members of the industry or through a centralised service. We are concerned that this proposal will introduce additional stress, costs, risks and challenges, as highlighted in our consultation response.

6. Did it make reasoned recommendations for improvement?

While we understand the reasoning behind the proposal, we are opposed to it, as we do not believe we are the most appropriate members of the industry to implement this service.

7. Any further comments?

100Green is keen to remain engaged and cooperate with industry members to facilitate a centralised solution for this consultation proposal.