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20 December 2024

Dear Steve

### **Consumer Standards – 24/7 Metering Support Statutory Consultation**

Thank you for the opportunity to respond to the Consumer Standards Consultation. In 2022, Electricity North West raised a Retail Energy Code change ([R0053 '24/7 Emergency Metering Service'](#)) as we had identified the same issue and the impacts upon our customers. We noted from the REC0053 RFI responses from other network operators and our own experience the significant disparity between the service from network operators for those customers who experienced a fault on the network (where network operators will respond 24 hours a day, 7 days a week and 365 days per year) and the service from suppliers for those customers who lost supply as a result of a fault on their meter. Many customers continue to contact us as the network company to resolve the meter fault and, despite our best efforts to contact the supplier to fix or replace the meter, we continue to support our customers until they can receive advice and assistance from their supplier.

Ofgem specifically notes that Suppliers' unavailability is putting additional and unnecessary pressure on network operators despite networks not having responsibility for the suppliers' meters. This could have impacts on the ability of network operators to respond to emergency situations in a timely manner, indirectly causing further consumer harm.

We welcome the Ofgem proposal to activate the dormant supplier licence condition to require supplier's energy services to be available 24/7 for customers off supply due to meter fault is to provide immediate assistance guidance or advice. We fully support the proposed outcomes for customers Ofgem expect suppliers to deliver to meet the requirements of the licence condition and needs of customers (especially where the customer is placed in a vulnerable situation due to the loss of supply). We also welcome the approach to put minimum standards in place if the outcomes-based approach fails to deliver the right service for customers. We recommend that Ofgem should monitor the availability of the service through sample checks of customers who have contacted the suppliers for this service or by simulated contacts by an external body (i.e. a "mystery shopper" style contact).



Our answers to the consultation questions are attached below. Please feel free to contact [Bryan.Heap@enwl.co.uk](mailto:Bryan.Heap@enwl.co.uk) or myself if you have any further questions.

Yours sincerely

**Paul Auckland**  
**Head of Economic Regulation**

## **Appendix 1 Consultation Questions**

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

*We agree with the proposal to activate the Supplier Licence Condition. We raised this issue as part of a REC change proposal (R0053 '24/7 Emergency Metering Service') and agree that this approach will provide suppliers with appropriate responsibilities to support customers off supply due to a metering fault which falls outside of their suppliers contact hours, without specifying solutions. We also agree that Ofgem should continue to monitor the service and should keep the option open to place defined service levels in place should customer detriment remain. Ofgem could publish information on availability of the service as a mechanism to demonstrate compliance if further licence enhancements are required.*

### **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.**

*We note that the change is to take effect from April 2025, and as such will result in the new licence condition becoming live after the 2024/25 winter period. Whilst this is not optimal timing, we note the Ofgem state their recent RFI indicated that most domestic customers appear to already have suppliers who are compliant with the licence condition. We recommend in Ofgem's monitoring of the new service to understand which of those suppliers who we went early if they could share best practice with those who did not to help them with upscaling in plenty of time for winter 2025/26.*

### **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 agree with Ofgem's assumption that there will be non-monetised benefits that could accrue to customers, including customers in vulnerable circumstances in the form of expected reduction in the risk of injury, fatality and damage to property. We also believe that there will be significant benefits in reducing stress for customers (i.e. mental health benefits) when they are seeking to deal with being off supply and resolve with their supplier.*

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

The updates to the guidance document (contained in Appendix 2 of the consultation) provides clear and concise expectations on the responsibilities of the supplier.