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Dear Sir/Madam

Citizens Advice appreciates the opportunity to respond to Ofgem's call for input regarding the Independent Gas Transporters' (IGT) Relative Price Control (RPC). As the statutory consumer advocate for energy consumers in Great Britain, we are committed to representing the interests of consumers. This submission is not confidential and may be published on your website.

Citizens Advice supports reviewing the IGT RPC framework. The following should be within the scope of the review:

- Ofgem should test how well RPC arrangements have ensured that IGT transportation charges have been limited to levels broadly consistent with the equivalent charges of GDNs. We have been unable to complete this analysis from publicly available information. We do not believe the information and data suggested within this consultation will be sufficient to complete this analysis.
- Ofgem, as part of this review, should also compare the amount and quality of publicly available information published by the IGTs compared to the GDNs.
- Ofgem should also collect data on essential consumer protection measures, including Priority Services Register (PSR) provisions, compliance with Guaranteed Standards of Performance (GSOPs), overall customer service performance, and the causes of network downtime.

Patron HRH The Princess Royal **Chief Executive Dame Clare Moriarty**

Citizens Advice is an operating name of the National Association of Citizens Advice Bureaux.

Charity registration number 279057. VAT number 726 0202 76. Company limited by guarantee. Registered number 01436945.

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We welcome ongoing dialogue with Ofgem as they progress with this review of the regulatory regime for IGTs. We want to work with Ofgem to ensure that the RPC framework is delivering for energy consumers.

Yours sincerely,

TungHing

Citizens Advice response to call for input

1. To what extent do you support a review of the IGT RPC framework? (How do recent developments, including those we have listed or any others of which you are aware, inform your opinion? We are especially interested in views in relation to the following perspectives:)

We support a review of the IGT RPC framework.

2. To what extent does our proposed review scope meet your expectations? (If the proposed scope does not meet your expectations, please provide details of what should be excluded/included and your reasons for those exclusions/inclusions.)

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The information outlined in the consultation refers to prices charged to supply points. However, the RPC arrangements refer to limiting *charges*. In practice, prices are applied to capacity values attributed to a supply point to generate charges. The process of calculating and updating capacity values differs between IGTs and GDNs. Hence, it is impossible to compare IGTs and GDNs charges based on prices alone. We are aware that capacity values applied by GDNs have historically been updated more regularly than those of IGTs. This led to a divergence in charges that would not be discovered by simply comparing prices.

We also have concerns regarding the extent of publicly available information on critical customer service measures, such as PSR provisions, compliance with GSOPs, and overall customer service performance. The absence of transparent and accessible data makes it difficult to assess whether IGTs are meeting their obligations, especially to vulnerable consumers. We believe that Ofgem's review should include an assessment of these customer service areas to determine whether additional protections or reporting requirements are necessary to ensure consumers are receiving adequate service.

4. To what extent do you agree that the information and data suggested at paragraph 2.7 is reasonable and sufficient for the purposes of the proposed review? (If you consider that the information being requested is unreasonable or insufficient, please explain why and provide any amendments, alternatives or additions.)



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Data is required, in addition to pricing information, to enable comparison between IGT and GDN charges. This is likely to mean supply capacity values on a comparable basis. This will need careful definition based on an analysis of how capacity values are derived and updated, which varies between IGTs and GDNs.

We also recommend that Ofgem expand data collection to provide a more comprehensive view of service quality within IGT networks. This should include data on the causes of network downtime, identifying whether issues stem from the IGT's network or upstream networks, as well as PSR and Guaranteed Standards of Performance (GSOPs) data. Specifically, this should cover the frequency of GSOP failures and the compensation provided to consumers.

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