



**7 March 2025**

Dear Access and Connections, Gas Systems and Operations Unit,

We welcome the opportunity to respond to Ofgem's call for input on the review of the gas disconnections framework. Citizens Advice is responding as the statutory consumer advocate for energy consumers in Great Britain.

## **Responses to Ofgem's questions**

### **1. How effective is the current gas disconnections framework in protecting the consumer interest, assisting net zero goals and promoting economic growth?**

The Climate Change Committee's (CCC) advice to the UK government on the 7th Carbon Budget unequivocally recommends that homes switch to electric heating. The CCC sees 52% of all homes switching to heat pumps by 2040, with 68% of all homes on some form of electric heating<sup>1</sup>. For homes currently connected to the gas grid, this switch away from using gas for space heating and hot water would mean a significant increase in the number of gas disconnections during the 2030s. The 7th Carbon Budget report mentions that heat pump installations will reach an annual rate of 1.5 million by 2035<sup>2</sup>, and we assume that the majority of these homes will subsequently disconnect from the gas grid.

We agree that the current gas disconnections framework is very unclear for consumers looking to remove their connection to the gas grid. As Ofgem highlights in the call for input, there seem to be two paths that a consumer may follow:

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<sup>1</sup> Climate Change Committee: [The Seventh Carbon Budget](#). February 2025.

<sup>2</sup> Climate Change Committee: [The Seventh Carbon Budget](#). February 2025.



- **Health and safety disconnection:** The consumers can ask their supplier to cap the gas meter and then wait for the GDN to disconnect the supply 9 – 12 months later for health and safety reasons. Total cost around £200 + VAT.
- **Voluntary disconnection:** Alternatively, they can ask the Gas Distribution Network (GDN) to disconnect the supply immediately. Total cost varies from less than £1,000 + VAT to more than £3,000 + VAT.

We welcome Ofgem exploring whether the current gas disconnections process works effectively and we encourage Ofgem to ensure that the process to disconnect from the gas grid does not slow down homes transitioning to low carbon electric heating in a fair way.

There is limited public information available from energy suppliers and the GDNs about these two disconnection processes. This lack of transparency is no longer fit for purpose at a time when gas disconnections are increasing as consumers begin to switch to low carbon electric heating.

Most of these consumers seeking disconnection from the gas grid will rely on advice from the company replacing their gas heating system with a low carbon electric alternative. This advice may come from their energy supplier or an independent heating engineer. It is unclear whether heating engineers are providing the right information to consumers about their options.

We also note from the limited information that is publicly available from the GDNs that the disconnection cost seems to vary significantly between different GDNs. For instance, Cadent's indicative price tool sets out a cost of £2,106 + VAT for pipes up to 63mm in diameter in North London<sup>3</sup> but £1,545 + VAT for the same work in their North West network<sup>4</sup>. In comparison, Northern Gas Networks quote £770 to £1155 +VAT for the same type of work<sup>5</sup>, with the cost varying depending on whether the GDN needs to dig into roads or verges.

We also note that more than 3 million properties are connected to Independent Gas Transportes (IGTs) and recommend that Ofgem explores the disconnection processes and costs for the IGTs as well.

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<sup>3</sup><https://cadentgas.com/our-services/household-customers/gas-disconnections/indicative-pricing-tool/north-london-region>

<sup>4</sup><https://cadentgas.com/our-services/household-customers/gas-disconnections/indicative-pricing-tool/north-west-region>

<sup>5</sup><https://www.northerngasnetworks.co.uk/gas-connections/disconnect/what-to-expect/>



## **2. What factors impact the effectiveness of the framework in achieving its objectives?**

The complexity as well as the lack of transparency around the gas disconnection process undermines the current framework. There is limited public information available from energy suppliers and the GDNs about these two disconnection processes, making it harder for consumers to understand their options under the current framework. This lack of transparency is no longer fit for purpose at a time when gas disconnections are increasing as consumers begin to switch to low carbon electric heating.

We also believe that the complexity and lack of public information available for the current gas disconnections framework prevent it from effectively protecting consumer interests and promoting fairness. For example, some consumers who might be aware of the health and safety disconnections path may end up paying significantly less than those who are unaware of it.

## **3. What factors impact the efficiency of the framework in achieving its objectives?**

The current process is inefficient because the costs that individual consumers pay for their gas disconnection can vary significantly depending on the advice provided and the geographical location, therefore the GDN, rather than because of the underlying cost of the disconnection.

## **4. What other factors beyond those impacting the effectiveness and efficiency of the framework (dealt with in questions 2 and 3), for example, safety, financial, commercial factors, ought Ofgem consider as part of its review?**

No answer.

## **5. What factors do you believe will impact demand for gas disconnections?**

The main driver of gas disconnections over the next 20 years will be the switch to low carbon electric heating systems. The UK government, Ofgem, the National Infrastructure Commission and the Climate Change Committee expect the number of low carbon electric heating installations to increase to more than 1 million per year in the 2030s.

We recognise that the demolition of properties may also drive some gas disconnections, though we expect the number of demolitions to be much smaller.



**6. What are the potential future regulatory frameworks, regimes or mechanisms that should be considered for gas disconnections that would operate effectively, assist in achieving net zero and protect consumers?**

Disconnecting from the gas grid should be a low-cost, fair and hassle-free option for consumers looking to decarbonise their homes, as there is already a significant cost to switching from gas to electric heating, with the average installation of a heat pump costing £12,500<sup>6</sup> (Q4 2024, Boiler Upgrade Scheme data).

A balanced approach should be implemented regarding the coverage of gas disconnection costs. It is important to find a point between having the household requesting the disconnection pay these costs upfront and, on the other hand, socialising these costs entirely. This approach should be applied consistently, with any regional variations properly justified, and appropriate protections for those who can't afford the disconnection costs, including exemptions from upfront payments and targeted bill support that reflects energy costs.

We recommend that Ofgem investigate why disconnection costs seem to vary so significantly between GDNs and GDN regions. We would encourage Ofgem to explore what drives these variations and whether they can be justified based on regional variances in, for instance, salary.

We recognise that the demolition of properties may also drive some gas disconnections. A separate regulatory framework for gas disconnections may be appropriate for demolitions.

We additionally recommend that Ofgem enhances its monitoring of the number of gas disconnections and the cost of those disconnections. We recommend that the core data items requested from the GDNs in the call for input form the basis of this ongoing monitoring.

Finally, we want to emphasise the need for a fair future framework for gas disconnections and we ask Ofgem to consider the impact of gas disconnection costs on the most vulnerable consumers. Transitioning to a heat pump and disconnecting from the gas network is an expensive decision for many households, leaving the most vulnerable ones unable to afford this transition and thus remaining connected to the gas network. However, as more and more financially able households will switch away from gas in the coming years, gas bills are expected to rise and the customers who remain on the gas network will face increasing bills as well as the

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<sup>6</sup> <https://www.gov.uk/government/statistics/boiler-upgrade-scheme-statistics-december-2024>



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gas disconnection costs by those switching to heat pumps, being in this way at a higher risk of experiencing fuel poverty.

**7. Of these potential future frameworks, regimes or mechanisms which is preferable and why?**

We recommend that any rise in the cost of gas disconnections, for instance because there is an increase in the number of people switching to electric heating, is incorporated into future price controls, subject to the appropriate balance being found as described in the response to Q6.

**8. Are there any impediments inherent in the potential future regulatory frameworks, regimes or mechanisms identified in response to question 6 above that would affect their effective operation, the achievement of net zero and/or the protection of consumers?**

No answer.

**9. For the purposes of this Call for Input, we have defined 'small businesses' as those with an annual gas consumption of not more than 500,000 kWh. What are the implications, if any, of using this definition?**

No answer.

**10. Is there anything else we ought to consider that has not been covered in your responses to questions 1-9?**

No answer.

Yours sincerely,

Citizens Advice

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

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