

Future Consumers
Ofgem
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Canary Wharf
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E14 4PU

22 January 2026

Dear Future Consumers Team,

Thank you for the opportunity to respond to Ofgem's consultations on the Guaranteed Standards of Performance (GSOP) and the Consumer Outcomes Call for Input. We follow this work closely and have also responded to the Smart Meter GSOP consultation, which is strongly connected to these proposals.

After reviewing both consultations, we have serious concerns about how realistic and achievable the proposals are. We do not believe they fully reflect the operational challenges we face, the limits of the engineering field workforce, or the costs involved. These costs will eventually be passed on to consumers. We are also concerned about combining domestic and non-domestic markets under one GSOP framework, as these markets work very differently and have different customer needs. We would also appreciate clarity on how "vulnerability" will be defined for non-domestic customers, as we do not see a practical way to apply this in that market.

Ofgem suggests that GSOPs could play a bigger role in the regulatory framework, with more focus on outcomes and fewer licence rules. We understand the intention, but we do not believe outcomes-based regulation alone can improve results. Lessons learnt from other regulators, such as the FCA, shows that better outcomes require understanding human behaviour, operational limits, and organisational capacity. Without this in consideration, the sector may repeat past problems.

A major issue is the shortage of skilled workers, especially engineers and specialist staff. We have raised this with Ofgem many times, but it does not appear to be reflected in the proposals. The International Energy Agency¹ has reported that the UK may have 20% fewer engineers in the next ten years due to retirements. The National Engineering Policy Centre² also highlights large skills gaps and long training times. These challenges are outside our control, but they directly affect our ability to meet service standards.

¹ <https://iea.blob.core.windows.net/assets/e5b9e908-26fe-4228-8978-e4ee36c555ed/WorldEnergyEmployment2025.pdf#page=53&zoom=100,72,105>

² <https://nepc.raeng.org.uk/policy-work/engineers-2030/the-future-of-engineering-education-and-skills-engineers-2030/>

We are also concerned about expanding GSOPs to the non-domestic market and to more services. While some current GSOPs work well, widening them without a clear assessment creates risks and challenges. For example, automatic compensation payments would require new systems and processes, increasing costs. The consultation does not explain what the compensation levels would be or what the total cost impact might be. Without this information, it is difficult to judge whether the proposals are fair or practical.

Recent Government announcements show that more changes are coming to the energy market. The proposals in this consultation could increase costs, which may be passed through customer bills and in our view, this contradicts the Government's aim to reduce energy costs and protect consumers.

We also want to highlight that we must use metering service providers, but we are still held responsible when those providers fail to deliver. This is not fair, as we do not have full control over their performance. We would welcome action from Ofgem to introduce clear and enforceable rules for smart metering operators. The proposals also seem to place a heavier burden on smaller suppliers, and in our view, this is not a balanced approach.

Regarding GSOP design, we note the options for changing payment mechanisms. A simple increase in payment levels would not be a major issue. However, variable compensation based on "harm" creates many practical problems. The consultation does not explain how harm would be measured, what evidence would be needed, or how consistency would be ensured. Customers have very different situations, and without direct engagement by them it is difficult to judge the right level of support. Variable payments would add complexity and administrative burden.

We have similar concerns about different payment levels for different customer types or markets. Domestic and non-domestic markets operate very differently. The proposal to extend repeat payments for ongoing breaches also increases financial risk, especially when delays are caused by workforce shortages or external factors outside our control.

We understand Ofgem's aim to increase awareness of GSOPs and improve monitoring. However, we are already dealing with a high volume of regulatory changes, guidance updates, repeated duplicated data requests, and new directions. Our internal teams are under pressure from customer service framework, regulatory engagement, compliance, and metering tasks. These demands increase the cost of meeting licence requirements and reduce our ability to innovate and improve services. We encourage Ofgem to consider these cumulative pressures.

We also note that no impact assessment was shared with the consultation. There is no clear summary of costs, risks, operational challenges, or distributional effects. Without this, it is not possible to give a fully informed response. We are particularly concerned that the proposals may place extra pressure on smaller suppliers.

CEER's³ best practice guidance under Delivery and Feasibility explains that:

"It is one thing to find the 'best' option on paper. It is another to make sure it works in practice. A regulation that looks flawless in analysis can fail badly if it cannot be delivered, enforced, or complied with."

³ https://www.ceer.eu/wp-content/uploads/2025/12/RDM-Guidelines-final_final.pdf#page=7&zoom=100,91,132

Both consultations do not clearly explain how the proposals would be delivered, enforced, or monitored, how unexpected problems would be managed, or how the impact of the proposals has been assessed. This creates uncertainty and adds further risks and challenges for us.

Overall, while we support efforts to improve customer outcomes and market performance, we believe the proposed GSOP changes, especially the extension to the non-domestic market, need a more balanced and realistic approach that reflects the challenges the sector is facing.

Without proper consideration to workforce capacity, human factors, costs, deliverability and feasibility, there is a real risk that well intentioned proposals will increase costs and may fail to achieve their aims.

We look forward to continuing a constructive dialogue to improve the energy system for all consumers, including those with vulnerable characteristics, and to avoid repeating past problems.

Should you wish to discuss any of our points above, please contact us.

Yours sincerely,

Antonis Lamaj,

Regulation & Compliance Manager

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