

Call for input – Energy consumer outcomes & review of Guaranteed Standards of Performance

Response from Citizens Advice Scotland to Ofgem

Introduction

The Extra Help Unit (EHU) at Citizens Advice Scotland, welcomes the opportunity to respond to Ofgem's two Calls for Input published on 10 November 2025. Both consultations aim to reshape consumer protection and supplier regulation through a more outcomes-focused framework – and as a consumer advocate we support any initiative that will realistically improve the standard of service people receive.

The EHU is a statutory service supporting people and small businesses in vulnerable situations with energy issues across Great Britain. Our insight is grounded in real life experiences, including:

- Consumers with serious or chronic medical conditions
- Disabled people requiring energy for essential equipment
- Households experiencing acute financial hardship
- Multi dimensional vulnerabilities (health, income, digital exclusion, safety)
- Scenarios where the person or household is in a vulnerable situation due to the complexity of their energy supply complaint

Our AI insight tells us that 75% of people using our service have mental or physical health conditions. The EHU seeks to put in place the best possible outcome for people, and currently achieves a positive outcome on 97% of cases, with over £8 million in financial redress secured for people and households in the past 12 months. We achieve these outcomes by taking a person-centred approach, and through close collaboration and negotiation with suppliers.

Given the seriousness of harm experienced when suppliers fail in their obligations, we are concerned that Ofgem's initial proposals—while well intentioned—may not yet provide a sufficiently robust foundation for improved performance.

Acknowledgement of Ofgem's aims with these proposals

Within these two Call for Input documents are laudable aims, recognising the need for improved customer service at suppliers. We regularly see examples of people approaching Bureau or needing referral to the Extra Help Unit, because when they have attempted to contact the supplier, but the necessary actions have not been taken to resolve the problem they are experiencing. Bureau and even the Extra Help Unit on occasion will still experience the same problems when dealing with escalated complaints teams within these same companies.

The 24 Consumer Outcomes proposed, in theory, cover most if not all the key areas where we would expect suppliers to provide people and businesses with good outcomes. We are presently concerned in particular about the challenges facing people with debt and affordability concerns, as well as the many challenges that continue to be faced by energy consumers in other vulnerable situations. The principals set out for these outcomes sound like good goals the energy supply industry should strive to achieve.

However, while we do acknowledge there is a large amount of existing regulation and appreciate that there may be areas where regulations are outdated or even counterproductive, it is also true that principles-based regulations can lead to confusion for consumer groups, suppliers and the people they are designed to protect.

Our casework shows frequent supplier failures in basic duties. People rightly expect good outcomes rooted in **accessibility, responsibility, and transparency** — principles supported by Ofgem's own research. But these outcomes require a level of competence, training, and cultural alignment that is inconsistent across suppliers.

A high-level outcomes framework assumes suppliers have:

- Adequate subject-matter expertise
- Effective governance and internal controls
- Staff trained to interpret broad principles
- Robust systems to identify and support vulnerability

Our evidence suggests these assumptions do not hold consistently. Our experience of working with energy suppliers over time, has shown that the industry can welcome more principles based regulation initially only to raise concerns later that there is not enough clarity from the regulator on expectations when it comes to crucial issues. While some suppliers are open to innovating and often exceed expectations, others will look to only meet minimum standards. These differences can be driven by the culture and personalities within energy suppliers, and can even fluctuate with changes in personnel in senior positions. A further driver of supplier behaviour towards minimum standards, can be any financial pressures (real or imagined) on that company at any given time.

As a result while broad umbrella outcomes might have a place in regulation, we would argue that without strong and explicit minimum standards or accompanying prescriptive regulation, "broad outcomes" risk:

- Being interpreted in a weak or inconsistent manner
- Reducing protections for people in vulnerable circumstances
- Creating a compliance landscape that becomes harder to enforce

Importance of Clarity to Drive Compliance

Consumers, especially those in vulnerable circumstances, need **predictability and enforceability**. While outcomes-based rules promote flexibility, as explained above the risk is that suppliers default to interpreting obligations in the least burdensome way for themselves.

We therefore encourage Ofgem to retain:

- **Clear baseline expectations** within each Consumer Outcome
- **Strong detailed guidance** accompanying every broad principle
- **Specific operational safeguards** for consumers in vulnerable situations

Ofgem's call for input seeks views on how Consumer Outcomes could integrate with monitoring, compliance, and enforcement. The Extra Help Unit is part of the Tripartite arrangements alongside colleagues at CitA, the Energy Ombudsman and Ofgem's own compliance team. Through this forum, we regularly raise concerns about specific supplier's actions (or inaction) which are causing detriment for their customers and/or examples of potential regulation breaches. This is also part of our obligations under section 14 of the CEAR Act.

Our experience shows that suppliers already struggle with certain existing rules—even those that are binary and straightforward. What's more there can be a distinct impression that Ofgem on occasion is limited by whether certain regulations can be enforced as originally intended. Often when we are debating regulations with managers at suppliers, we need to refer to historical references such as previous consultation and decision documents, or open letters that may have been published by Ofgem many years ago, in order to evidence our point. However, as an example in one recent discussion with a supplier what we feel was a clear instruction in an open letter, was dismissed as guidance which was no longer relevant by the supplier. If suppliers cannot reliably meet current standards, a more interpretive framework risks further inconsistency.

We believe Consumer Outcomes would therefore also need to include:

- **Mandatory minimum standards** or detailed prescriptive elements beneath each broad outcome
- **Enforceable expectations** for identifying, recording, and supporting vulnerability
- **Enhanced reporting requirements**, including independent audits
- **Strengthened accountability** for senior leadership in delivering the outcomes consistently, to ensure virtually no evidence of non-compliant outcomes can be identified across their entire customer base

Another point of concern in the consultation document is that one set of Consumer Outcomes would apply to both domestic and non-domestic consumers. If this was to help level up expectations on non-domestic suppliers to offer better outcomes, it would be welcomed. However, there is acknowledgement that non-domestic suppliers will have different processes and tailor their offering to their theoretical customer bases. Our concern is the current problems

facing domestic households and mixed-use premises that find themselves supplied via non-domestic suppliers, would therefore not be addressed by the proposals as they are currently set out.

A final point from an EHU and advice service perspective is that any change to regulatory approach must not adversely impact the support which advice providers offer. While we understand the importance in improving consumer trust in energy suppliers, many vulnerable people will always need the support of an independent and trusted third party to advocate on their behalf.

Response to GSOP Review Call for Input

We welcome Ofgem's parallel review of the Guaranteed Standards of Performance (GSOP) which aims to examine the **role**, **scope**, **design**, and **operation** of the standards, which have not been fully reviewed since 2015.

The EHU regularly request that existing Guaranteed Standards are adhered to and payments made through our Casework. The benefits for consumers of the Guaranteed Standards payment, can be particularly beneficial for example if there has been repeat failures by the supplier to complete metering work, something which causes frustration and often costs for people who need to make themselves available for the engineer to attend.

However, we also experience scenarios where suppliers already fail to adhere to the existing clear GSOP requirements.

We regularly observe suppliers:

- Misunderstanding when GSOP applies
- Failing to issue GSOP payments automatically
- Examples were even escalated complaints teams the EHU deal with are unaware of GSOP, or try to provide the payments as goodwill that doesn't show up in reporting

These failures occur despite GSOP being among the most unambiguous regulatory duties, and we think consideration must be given to this before expansion to cover other standards is considered. Two case study examples are available at the bottom of this document.

Considerations for redress

One major concern we have is that if GSOP becomes a more widely used mechanism, suppliers may increasingly rely on fixed payments instead of offering discretionary goodwill, even in cases where harm is significant.

Fixed-rate GSOP payments:

- Do not account for compounded or multi-factor vulnerability

- May undercompensate consumers experiencing severe hardship
- Risk becoming a *ceiling*, not a floor, for redress

This is a really serious concern – its vitally important the most vulnerable people across GB don't obtain poorer outcomes as an unintended consequence of any GSOP expansion.

As such we would recommend the need for:

- **Stronger supplier training and competence standards**
- **Greater public awareness of** GSOP rights communicated in a simple and accessible format
- **Higher penalties** for repeated non-compliance
- **Robust oversight** and where necessary enforcement action to ensure suppliers deliver both GSOP and broader Consumer Outcomes consistently

The additional themes which are suggested as possible extensions of GSOP (adherence to complaint handling timescales, billing requirements and implementation of Ombudsman Remedies) are all interesting areas to explore, but as noted in the Call for Input some of these areas are currently being reviewed in parallel projects. We would appreciate the chance to engage in further discussions about these proposals and how they might work in practice.

Conclusion

We welcome Ofgem's ambition to enhance consumer protection, address regulation gaps and improve consistency of outcomes across the energy supply sector in GB. However, suppliers' current performance suggests that relying predominantly on broad principles **without stronger minimum standards, clearer expectations, and robust enforcement** risks weakening consumer protections—particularly for those already in vulnerable circumstances.

We welcome further engagement with Ofgem and stand ready to provide additional evidence from our statutory casework as the next phase of these reviews progress.

About Citizens Advice Scotland

The Citizens Advice network in Scotland is Scotland's largest independent advice provider. Advisers across all corners of the country work in Citizens Advice Bureaux (CAB) to provide free, impartial and confidential advice. Our Extra Help Unit (EHU), based in Glasgow, helps people across GB resolve complex and time-sensitive energy problems. Each year our network supports hundreds of thousands of people, unlocking millions of pounds worth of financial gains. By looking at a person's complete circumstances, CAS gains an unparalleled insight into the scale and complexity of what's happening in communities throughout Scotland.

Case studies

CS 1

Annie was referred to the EHU when her electricity supply was affected due to the RTS signal switch off, resulting in no hot water. An emergency appointment was completed to replace the meter that day. Prior to this Annie had been attempting to have her RTS meter exchanged to a smart meter for 6 months. Appointments were repeatedly cancelled at short notice or not completed. This was a huge inconvenience involving unpaid time off work, arranging cover for shifts and rearranging childcare to accommodate each appointment.

Under the EHU case, GS payments were made for the failed appointments however, the complaint handler at the supplier was not aware that GS additional payments were also payable due to the payments not being made within 10 days of the failures. These were agreed to resulting in:

- £280 Guaranteed Standards of Performance payments for 7 failed meter appointments.
- £240 Guaranteed Standards of Performance additional payments for 6 of the payments not being made within 10 days.
- £200 as a goodwill gesture apologising for the multiple delays and resulting impact on electricity supply.
- £50 for the poor customer service during calls to meter operator.
- This all resulted in a credit balance of £723, having been in £46 debit.

CS 2

June lives alone and is managing multiple health conditions, including osteoporosis and a partially collapsed lung. She receives Universal Credit and is currently experiencing financial hardship. Her next income is not due for another three weeks and she had been unable to activate the emergency credit on her gas PPM. It went into friendly credit mode, accruing £3 debt then disconnecting. Her supplier had arranged credit to clear this but it did not transfer onto the meter. She followed further instructions but the meter became locked after multiple attempts. Despite her efforts, the supplier said no engineer would attend to assess the issue and she was left with no workable solution, and told she was responsible for fixing it herself. This is despite the instructions provided not working. After EHU intervention:

- Gas meter successfully re-enabled.
- **At the request of the EHU**, Guaranteed Standards of Performance payment of £40 made for failing to take an 'appropriate action' to establish whether the meter was faulty and either restore or replace it.
- Initial goodwill credit £20 for electric PPM.
- Supplier's affordability team provided an electric blanket to support June's health and wellbeing and £240 non-repayable credit between her gas and electricity meters, significantly easing her financial pressures.