



Future Retail Markets and Retail Policy Teams
Ofgem
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Emailed to FutureConsumers@Ofgem.gov.uk

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Dear Future Retail Markets and Retail Policy teams,

Consumer Outcomes and Supplier Guaranteed Standards of Performance – Calls for Input

Drax Energy Solutions Limited (DESL) is the retail arm of Drax Group plc (Drax). DESL supplies electricity to non-domestic customers and provides energy services solutions to support businesses in their decarbonisation journey. Drax also owns and operates a portfolio of flexible and renewable electricity generation assets – providing power for the equivalent of more than 8 million homes across the UK.

Recognising that Supplier Guaranteed Standards of Performance (GSOP) and Consumer Outcomes form part of the same overarching aim - to improve consumers' experience of the energy market - and that Ofgem is progressing the workstreams in parallel, we are providing a single response to both Calls for Input. Our views and remarks should exclusively be viewed as relating to the non-domestic retail market.

Over the last 15 years, Ofgem has increasingly moved away from relying upon effective competition to drive positive consumer outcomes and has instead introduced a swathe of prescriptive and principles-based regulation. Today's non-domestic energy retail market is mature and with Government now committing to the regulation of TPIs we believe the time is right to return to the core principle of promoting effective competition as the primary means to foster investment and innovation, and to drive the right outcomes for consumers. To that end, we believe less (or lighter touch) regulation and less regulatory change (or the ongoing prospect thereof from successive reviews) would be far better than the status quo situation.

In terms of designing the resulting regulatory framework, the most logical approach would be to first consider and determine the desired Consumer Outcomes before deciding if and where GSOP are necessary or complementary. That sequential approach should also be differentiated between the markedly different domestic and non-domestic markets to ensure the respective frameworks are targeted, effective and proportionate.

In principle, we're supportive of a bold transition towards an outcomes-based regulatory framework and believe that if the Consumer Outcomes are appropriately embedded into the regulatory framework, it would allow Ofgem to reduce the current array of prescriptive regulation, opening avenues for innovation and growth. However, the current proposed Consumer Outcomes appear to have been drafted with the domestic market at the front of mind despite earlier feedback provided by suppliers in Ofgem's workshops which detailed why certain Outcomes are not reasonable or appropriate for non-domestic consumers. If certain of the outcomes are introduced as currently drafted, non-domestic suppliers would likely have to



make costly and burdensome changes to systems and processes to be able to deliver those unnecessary, unwarranted and undesirable outcomes for their customers.

Once the desired Consumer Outcomes are defined, it's then important to recognise and reflect the market differences when considering the role and appropriateness of GSOP in the more complex and diverse non-domestic market. While there may be some benefits in expanding certain GSOPs to parts of the non-domestic market, such as microbusinesses, they are not appropriate for larger businesses whose unique characteristics are less compatible with the simple, predictable scenarios that GSOP is suited to. Moreover, it would be inequitable to impose further costs on consumer bills to fund the implementation of GSOP payments to large corporate entities who are well-able to leverage their buying power and contractual provisions to achieve the outcomes they desire.

Our responses to the consultation questions are appended. We'd be happy to discuss any aspect of our response with you further if that would be helpful.

Yours faithfully,

Matt Young

Group Head of Regulation
Drax Group plc

Appendix 1: Response to GSOP Call for Input (Cfi) questions

Role

Q1. Do you have any views on how the GSOP should be used to deliver good consumer outcomes as part of our wider regulatory toolbox?

Ofgem should avoid changing and/or layering additional regulatory obligations wherever possible, as it increases the cost base of suppliers that is ultimately borne by consumers. The most logical approach for Ofgem's current review would be to first consider and determine the desired consumer outcomes, assess whether and to what extent the existing regulatory framework and toolbox delivers those outcomes, and if it doesn't to a satisfactory degree, to then consider what would need to be added or revised to close the gap. That holistic assessment of options could then consider targeted prescriptive licence conditions, or a more fundamental move to replace prescription with a principles or outcomes focused framework, or indeed, if a few targeted GSOP would suffice.

The non-domestic market has been subject to successive reviews over the last decade, each of which has been comprehensive and only led to targeted regulatory intervention. We've seen no tangible evidence to suggest the market, supplier behaviour or consumer experiences have changed substantively to now require or warrant significant intervention or change to the framework.

To avoid unnecessary costs, it's essential that a full impact assessment is carried out before extending, or introducing any new, GSOP or other regulatory change/intervention.

Q2. Do you have any comments on our proposed objectives for the GSOP mechanism?

We don't have any specific comments; the proposed objectives appear broadly sensible.

Q3. Do you have any comments on our proposed criteria for the design of any new Guaranteed Standards, or how we intend to use the criteria?

The draft criteria represent a good starting point but, we agree, the criteria should evolve as Ofgem refines its thinking on key aspects such as the role of the GSOP framework.

Q4. How effective is the current GSOP framework and individual standards in delivering good consumer outcomes? Please provide evidence where possible.

When applied in a targeted manner, we believe the standards help to focus suppliers' operational performance in specific areas that otherwise could risk consumer detriment, including inconvenience. However, they don't in and of themselves mean the underlying causes of issues will be addressed in any systematic manner, so the benefit can be limited to short-term resolutions.

Scope

Q5. Do you have any views on what would determine if a GSOP or a licence condition is the best tool to improve supplier performance?

Ofgem should look at the regulatory framework holistically, alongside the desired Consumer Outcomes, and consider the role that GSOP can best play. We would expect to see a greater role for GSOP in an outcomes-

based framework, where they could be targeted to individual harms, than under a prescriptive licence regime. Either way, proportionality is a key consideration.

Q6. Are there any supplier service areas where it would be appropriate for us to explore new GSOPs, or move an existing licence condition into the GSOP framework?

This largely depends on the overall regulatory framework and the role of GSOP within that. However, we have identified two service areas worthy of consideration for application to microbusinesses:

- **Energy Ombudsman remedies** – In its recent consultation on fairer, faster redress in the energy market, DESNZ highlighted concerns with inconsistencies in suppliers' implementation of Energy Ombudsman decisions. We suggest GSOP could be considered as an appropriate instrument to deter late or incomplete redress remedies.
- **Changes of Occupancy** - The Retail Energy Code (REC) recently introduced evidentiary standards and timescales to speed up the Change of Occupier process for non-domestic consumers. Now this process has been established, GSOP could be considered as a tool for reinforcing its effectiveness and ensuring accountability.

Alongside a full impact assessment, any potential new GSOPs need to be evaluated to determine whether they meet Ofgem's criteria, including being measurable, achievable and easy to understand and administer. Complex scenarios and standards where the cost of identifying the breach is likely to exceed the payment level should be avoided.

Q7. Should any of the current GSOPs be removed, or replaced with a licence condition to better achieve its policy aim?

We don't believe the GSOP applicable to the non-domestic market (i.e. making and keeping appointments) should be replaced or removed.

Q8. Should we consider expanding the GSOP mechanism to cover non-domestic customers, or a sub-section of non-domestic customers? If so, which existing or potential future standards would be most appropriate

The non-domestic market is diverse and complex, both in terms of customer traits and metering arrangements, with many unique characteristics that are incompatible with the simple, predictable scenarios that GSOP is best suited to. While there may be some benefits in expanding certain GSOPs to microbusinesses, it would be inappropriate to extend them to larger businesses, who can leverage their buying power and the terms of their contract if they experience issues or wish to escalate matters.

Including larger businesses could result in a significant increase in GSOP payments, and would certainly increase suppliers' cost-to-serve as a result of the new processes required, the costs of which would ultimately need to be recovered through consumer bills. It would be inequitable to impose further costs on consumer bills to fund the implementation of GSOP payments to large corporate entities.

While not all domestic GSOPs are suitable for microbusiness customers, some may be worthy of consideration. For example, erroneous switches reflect negatively on the industry and have the potential to cause detriment when not resolved quickly. Existing GSOPs for domestic consumers act as an incentive for erroneous switches to be resolved promptly. We believe this is a performance area that could meet the

criteria to be extended to microbusinesses, subject to the scale of the issue warranting intervention and an assessment of the cost versus benefit of introducing an associated GSOP.

We caution against the extension of GSOPs related to metering outside the domestic market. Complex metering is common in non-domestic premises and businesses are more likely to contract with their own agents, with the supplier having no part in the provision or ongoing maintenance of the meter, adding an additional layer of complexity. Moreover, anecdotal insights lead us to believe that MOPs (understandably) prioritise domestic metering issues, putting non-domestic suppliers at a disadvantage if they were held to tight timeframes.

Due to an increase in fraudulent activity relating to credit refunds, many suppliers have increased levels of scrutiny and, as a result, refunds may take longer to process. As such, this is not an appropriate time to extend GSOPs relating to speed of refunds to the non-domestic market, where the monetary value is higher and the risk of fraud is greater.

Design

Q9. Do you have any views on what the underlying rationale for the payment level and mechanism should be to best achieve the GSOP objectives?

As Ofgem acknowledges, payments made under the current GSOP framework are not intended to provide compensation reflecting the level of any financial loss suffered because of a supplier's poor performance. In our view, the driving rationale for the payments should continue to be to compensate a consumer for the inconvenience caused by their supplier failing to meet the minimum standard. Additional compensation can be provided by the supplier independently, or following direction from the Ombudsman, after a thorough assessment of the circumstances and any resulting detriment. Non-domestic consumers of all sizes have the capability and leverage to seek appropriate recompense outside of the GSOP framework for any substantive harm or loss caused.

Q10. Do you have any views on specific changes to the payment mechanism we should consider, including the examples included in this paper?

We don't believe it's appropriate to increase the payment level at this stage. The GSOP payment was increased from £30 to £40 in January 2025 after consultation and extensive consideration of relevant factors. GSOP payments are ultimately a cost to suppliers which must then be recovered from all customers and, as such, any increase to the current payment level should only be considered after a full impact assessment considering any new or extended GSOPs.

Q11. Are there any issues we should consider with introducing repeat payments for ongoing breaches?

We disagree with introducing repeat payments. If there is an underlying/systemic issue with a supplier process, or a third party, then suppliers are incentivised to address that to achieve the right outcomes for current and future consumers. Rather than requiring suppliers to repeatedly make GSOP payments for the same issue or incident, which would drive up their cost base, Ofgem could monitor repeat instances and step-in to investigate persistent offenders or the root cause of persistent issues.

Q12. Are there any issues we should consider with introducing variable payment levels for different consumer groups or severity?

We don't agree with introducing variable payment levels. As Ofgem concluded in its previous review, it is not the role of GSOP to compensate for financial losses or to define the level of severity of any consumer harm, which will vary depending on the circumstances of the issue and the customer.

Introducing variable payment levels for different consumer groups or severity would dilute the current complaints process, which affords suppliers, and the Ombudsman, the opportunity to consider all contributing factors, the detriment experienced and to determine appropriate redress in each individual case. Variable payment levels would also be at odds with maintaining ease of understanding and administration, which is one of Ofgem's desired GSOP criteria.

Q13. Are there any specific changes to the current set of exemptions that we should consider?

We cannot identify any specific changes to the current exemptions. However, this is a good opportunity to review them to determine whether they're still appropriate.

Q14. Are there any specific changes to the target levels of existing standards that we should consider?

As with exemptions, it would be logical to review existing target levels as part of this review.

Operation

Q15. Are there any improvements we can make to the way we collect data from suppliers specifically on their compliance with the GSOP?

To minimise the burden on suppliers, we suggest reporting requirements are set to reflect the size and type of supplier and the risk they present, e.g. a smaller non-domestic supplier should not be required to provide the same volume of data, at the same frequency, as a large domestic supplier. We would also appreciate early engagement and a collaborative approach to designing any new data requests to ensure they are workable from the outset. We'd also urge Ofgem to develop a secure upload area in Huddle (or an equivalent portal) for suppliers to submit their data, rather than using email.

Q16. Are there any additional risks that we should consider when exploring our approach to monitoring and ensuring supplier compliance with the GSOP?

Ofgem should be mindful of the potential for 'gaming', especially if there's no limit to the number of times a consumer can be awarded compensation for reporting a suspected problem. We see this as a particular risk in the non-domestic market, where some parties may be perversely incentivised to game the arrangements and seek repeat compensation payments.

Q17. Is there a need for any supporting guidance, either aimed at suppliers or consumers, to improve the effectiveness of the GSOP?

Guidance for suppliers, including clear definitions, would be helpful in ensuring GSOPs are applied in a consistent manner.

Q18. Is it important that consumers are aware of GSOPs? Why?

As the payments are automatic and made to consumers without them needing to contact their supplier, we don't think consumer awareness is necessarily important.



Q19. Are there any actions that Ofgem or suppliers should take to improve consumer awareness of the Guaranteed Standards?

Suppliers already publish information on their websites which we think is sufficient. Nevertheless, Ofgem and/or Citizens Advice could similarly provide high level information representing independent and trusted sources.

Appendix 2: Response to Consumer Outcomes Cfl questions

Q1. In your view, what are the key factors we should consider if we are updating our regulatory framework for retail energy suppliers, keeping in mind the balance between our growth and net zero goals, and consumer interest duties?

Instead of introducing further complexity or layering additional regulatory obligations, we favour pragmatic and practicable solutions which do not require suppliers to make costly and burdensome changes. See also our remarks in appendix 1 in response to question 1 of the GSOP Cfl.

Q2. Why do you think there is such a divergence of satisfaction rates across different consumer cohorts?

We are unable to comment on the domestic market, but the non-domestic market includes a wide variety of different business sizes and sectors, each of whom have different corporate and commercial priorities, and each placing a different importance on their energy needs (for example, those with a greater reliance on energy for their commercial activities or those where energy makes up a more significant portion of their operating costs will inherently have a greater threshold for satisfaction).

Energy can also be a more emotive issue for smaller businesses (e.g. sole traders and microbusinesses) than it is for larger businesses, with their ability-to-pay being a key determinant of their satisfaction. Whereas larger businesses, while equally focused on getting the best price for their energy, are not purely driven by price, and can be willing to pay a premium for additional advice/support, discrete account management or products/services to support their individual needs, such as meeting decarbonisation commitments.

Moreover, satisfaction, where framed around affordability, can also be heavily influenced by the economic strength of a particular sector or individual business, i.e. if a sector or business is doing commercially/financially well, then their threshold for satisfaction is likely to be lower (and more easily met) than for one that is doing less well.

Overall, the point we would highlight is that, the non-domestic market is less homogenous than the domestic market, and is incredibly diverse in and of itself. This characteristic makes it very difficult to rely on and compare a relatively narrow focus of satisfaction within and across non-domestic cohorts.

Q3. The Consumer Outcomes have been developed based on what industry, charities, consumer groups and consumers have told us they need to cover. Do you agree that these outcomes cover the most important expectations consumers have of energy suppliers?

We agree that they broadly reflect the most important expectations from consumers, although, for completeness, there should also be an outcome focused on deployment of, or access to, Smart meters and associated data, given the array of rules about meter provision in the licence.

Notwithstanding the above, we are concerned that the design of the outcomes is not targeted appropriately for non-domestic consumers. We and other suppliers have previously provided feedback explaining why some of the proposed Outcomes are not reasonable or appropriate for the non-domestic market, yet that feedback does not appear to have been factored into the updated Outcomes, nor the additional explanations provided. We have outlined key examples below (emphasis added):

- Outcome 1 – “Customers in, or at risk of debt or arrears receive proactive, tailored, and consistent customer service that meets their needs and helps them sustainably pay towards their debt or arrears”** - It will not always be possible or reasonable to help non-domestic customers “*find a way to manage their debt that they can realistically maintain over time*”. An individual non-domestic consumer’s ability to pay will be influenced by their business model, sector dynamics and financial performance, and it would be wholly inappropriate and unreasonable to require non-domestic suppliers to support failing businesses or incur debt/arrears on their behalf. We would suggest removing “*sustainably*” from the Outcome as well as “*that they can realistically maintain over time*” from the further information/explanation.
- Outcome 6 – “Consumers have a reliable supply of energy and suppliers do everything within their remit to quickly resolve disruptions, giving priority to those who are supply dependant”** – The further information provided by way of explanation indicates that this “*includes businesses for whom energy is critical to continuity of services*”. We have been unable to think of a business or sector (other than in very narrow circumstances) that could plausibly continue their services from their non-domestic premises without an energy supply, making this impractical to apply as a principle in practice. We would recommend revising the latter part of the Outcome to read, “giving priority to ~~those who are supply dependant~~ **vulnerable domestic consumers and non-domestic consumers who operate essential services**”.
- Outcome 7 - “When consumers raise concerns, issues or complaints, suppliers investigate and address them fairly, effectively and promptly, via a channel and at a time that meets consumers’ needs”** – This implies that all suppliers would be required to maintain all available communication channels on a 24/7 basis, something that is currently not required for non-domestic consumers and would be disproportionately costly and burdensome to provide for the very few instances where it might prove needed. We would recommend removing the words “*and at a time*” from the Outcome when applied to the non-domestic market.
- Outcome 8: “Consumers are charged for energy in a manner that accurately reflects their usage, with bills being easy to understand and provided in a consistent, timely and appropriate timeframe, as appropriate for the customer type. Customers who are struggling to pay their bills should receive compassionate support and flexibility in payment methods and frequencies, especially consumers in vulnerable situations”** – We do not believe this is appropriate in a non-domestic setting. While we agree it’s reasonable to expect suppliers to engage compassionately with a customer’s circumstances, the support they ultimately provide should more properly be practical and commercially reasonable. We would suggest adjusting the last sentence in this Outcome to read, “Customers who are struggling to pay their bills should ~~receive compassionate support~~ **be engaged compassionately and offered practical bill support including commercially reasonable flexibility in payment methods and frequencies, especially domestic consumers in vulnerable situations**”.
- Outcome 12 - “Customers should not be unnecessarily prevented from being able to switch supplier despite product or technology purchased or inherited”** – It is not clear whether “*unnecessarily prevented*” would prevent non-domestic suppliers from objecting when a customer in a fixed term contract tries to switch, as we are currently permitted to do so if it’s in our terms and conditions as set out in SLC 14.2. It would be helpful to clarify this in the further information/explanation provided.



Q4. Do you think we should streamline or consolidate the Consumer Outcomes further and, if so, which should we prioritise?

For ease of understanding, it may be sensible to try and reduce the number of Consumer Outcomes to a more manageable number, for example, Outcomes 9 and 11 could be consolidated into a single Outcome.

Q5. Do you agree with the explanations provided of the Consumer Outcomes in the appendices of this call for input? Do they help you understand the intent of the outcomes?

The additional information is helpful to a point but, in many cases, it doesn't go far enough, and further detail would make them clearer and more useable. Please also refer to our points made in answer to question 3.

Q6. Why do you think these outcomes are not materialising consistently for all consumer groups given that they are in line with our existing rules?

We do not agree that all the Outcomes accurately represent the existing non-domestic rules. We believe the Outcomes have predominantly been drafted to reflect the expectations of domestic consumers and the existing domestic regulatory framework. There are several examples where the Outcomes go beyond what is appropriate for non-domestic consumers and is currently required of non-domestic suppliers - Refer to our answer to question 3 for examples. That said, if the Outcomes were adjusted as per our comments in response to question 3, then we do believe our consumers are consistently realising those Outcomes currently, and we can't see any material gaps in the existing non-domestic rules or regulatory framework.

Q7. Do you think some outcomes are more important for consumers than others?

Please see our response to question 2. Some Outcomes will be considered more important than others depending on the consumer, for example the type or size of business, and the relative importance may change over time depending on the prevailing circumstances.

Q8. Do you see an opportunity for outcomes, though not necessarily the Consumer Outcomes set out in this call for input, to be applied to wider market participants? Who should they apply to and why?

If they are introduced, it makes sense for all market participants to be striving towards the same Outcomes for consumers. We can't see any reason why any finalised set of Outcomes shouldn't also apply (albeit adjusted as appropriate) to any participants that have direct touchpoints with consumers, most notably TPIs and MOPs.

Q9. Do you have a preferred approach among those outlined below or should we retain the current framework? Do you have an alternative suggestion? Please explain your reasoning.

In principle, we support a transition towards an outcomes-based regulatory framework and believe the only way that this could be done effectively and to ensure consistency across all suppliers is to integrate outcomes-based rules into the supply licence, albeit any integration should go hand-in-hand with removing any duplicative prescription. We believe that approach is far superior to simply incorporating it into a subordinate guidance document.

Q9(a). What level of action/intervention do you feel would be proportionate to drive up customer service in the non-domestic sector? Does it differ from domestic?

We are not convinced that any intervention is required in the non-domestic sector. It has only been a couple of years since Ofgem completed its comprehensive review of the Non-Domestic market which concluded that there were only discrete aspects of the market which required regulatory intervention, which were addressed accordingly, and that there was limited evidence of systemic issues. We've seen no evidence to suggest the market, supplier behaviour or consumer experiences have changed substantively to now require or warrant any action or intervention.

Q10. Do you think a voluntary approach – where suppliers make a public commitment to deliver the Consumer Outcomes without formal regulatory change could be effective? What conditions would need to be in place for this to work?

No, we don't believe that approach would be effective or helpful. It would only serve to add yet another layer of complexity and regulatory burden, albeit with no obvious recourse should suppliers fail to deliver those Outcomes, or indeed if suppliers choose not to make such a voluntary commitment. If Ofgem are to truly make the regulatory framework more effective (if indeed it is currently falling short) and easier for current and prospective market participants and consumers to navigate, then the Outcomes must be embedded in a way that makes them enforceable and that simplifies the regulatory landscape.

Q11. Could a more outcomes-based regulatory framework benefit the supply market? Do you think this kind of approach could unlock innovation and growth? Please provide examples.

In principle, we support a transition towards an outcomes-based regulatory framework that reduces the array of prescriptive regulation, as that should lessen the complexity and burden on suppliers while promoting flexibility in order to innovate. Moving away from the current arrangements – characterised by repeated sequential reviews and steady stream of costly and time-consuming regulatory change – would free-up budget and resources for suppliers to deliver innovative solutions to meet customers' current and future needs.

Q12. Are there specific licence conditions where less prescription could benefit the retail market without compromising consumer protection?

Non-domestic suppliers are subject to prescriptive licence conditions governing the provision of a host of information to customers, particularly in bills and on our websites, with the volume of prescription increasing over the years. We're concerned that the level of mandated information has now gone too far, and not only risks giving customers 'information fatigue', but also unnecessarily elongates communications and distracts customers from critical information that they need to be aware of. We'd favour less prescription in the area of customer communications and for suppliers to be able to determine the information that is appropriate, useful and important for our customers.

Q13. Are there areas where prescriptive rules should remain in place? If so, why?

We have no strong views.

Q14. What factors should we consider to determine whether specific rules are best delivered through prescription, principles or outcomes?

We believe Ofgem should primarily consider the risk of consumer harm in determining the most appropriate regulatory intervention. Prescriptive rules are likely to remain the most appropriate

intervention in high-risk and discretely defined scenarios where the impact of any non-compliance indicates that exact rules should be followed, e.g. obligations around domestic meter disconnections in SLC 27. However, where the risk is lower, or the activity, scenario or customer expectation/need can't be relatively narrowly defined, then Outcomes (or Principles) are likely to be better suited as they allow for flexibility and innovation. The customer expectation/need is particularly pertinent in the non-domestic market where Outcomes/Principles allow suppliers to adapt to meet a wide range of customer needs, compared with following a prescriptive, one-size-fits-all rule.

Q15. Which of the monitoring approaches we outline below would be the most effective for monitoring supplier performance against the Consumer Outcomes? Are there alternative approaches? Please provide evidence.

We appreciate that monitoring supplier performance against outcomes will be more challenging than monitoring compliance against prescriptive rules. For monitoring to be effective, there needs to be clarity on what “good” looks like in practice, including whether the Outcomes are intended to set a baseline level of acceptable performance and what would be considered “satisfactory”, noting that consumers expectations are not uniform, particularly across the non-domestic market.

We would expect that under an Outcomes-based regime, the reporting and monitoring of data wouldn't be dramatically different to today's world with a combination of leading and lagging indicators used to infer trends and to identify existing or impending risks and issues.

Q16(a). How do we best measure our success as to whether we have improved consumer outcomes and achieved our ambitions for customer service?

We have no specific suggestions.

Q16(b). How do we best measure our success as to whether we have reduced regulatory burden and encouraged growth and innovation?

We have no specific suggestions.

Q17. Is there anything Ofgem can do to improve how we work and engage with you as a stakeholder on retail energy supply policy and regulation?

We wish to provide feedback on the workshops utilised by Ofgem throughout the policy development process to date. The frequent use of break-out groups, where only a small number of suppliers are present, meant that we couldn't get a good consensus of the market's feel for particular proposals. A summary was requested following the most recent workshop but what was shared was lacking in detail. We understand the merit of occasional break-out groups to drill deeper into specific topics, but it would be more helpful and a better use of suppliers' time to participate in supplier-wide conversations, while also receiving a comprehensive summary of the key discussion points so that views are not misrepresented or misunderstood.