

By e-mail to: FutureConsumers@ofgem.gov.uk

Ofgem Call for Input - Consumer Outcomes

Ofgem
10 South Colonnade
Canary Wharf
London

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Dear Colleague

Ofgem Call for Input - Consumer Outcomes

Capgemini Invent welcomes the opportunity to share our views on Ofgem's call for input regarding Consumer Outcomes. We are very supportive of improving regulatory structure to protect consumer outcomes within the energy industry.

Capgemini Invent is the consulting, innovation, and digital business of Capgemini. We are Europe's largest supplier of systems and technology services to the Energy and Utilities Sector. HFS Research has ranked us as a Market Leader of outsourcing and managed services for energy and utilities businesses across 2025¹. Every year we publish the World Energy Markets Observatory (WEMO)². The WEMO is on its 27th Edition with Chapters 1 and 2 published. The 27th edition contains detailed analysis and insights into the world energy trends.

Our response to the consultation draws heavily from insights and energy market expertise gained in our work across GB market functions in both gas and electricity. Our experience covers a wide range of services relevant to the consultation, including supporting numerous energy network and central market clients in business and technology transformations, leading regulatory submissions across both gas and electricity, delivering code management services in the energy retail market and contributing to operating model and governance changes at the organisational and industry level.

Whilst we agree that the consumer outcomes comment on some of the most important aspects for protecting consumers, we are of the opinion that the outcomes require further consolidation and simplification. We recommend, as opposed to all responsibility being placed with the energy supplier, a whole market interaction is considered given it is more than energy suppliers who hold responsibility for the welfare and outcome of consumers within the energy market. Creating a fair distribution of responsibility will ensure one party is not held to obligations which could be detrimental to their operations. Regarding the simplification of the outcomes, we recommend further consolidation of the grouping currently in place to reduce the ambiguity surrounding the implementation and monitoring of the outcomes.

We have responded to the questions specified within the consultation within 'Appendix 1' below. We hope you find these insights and suggestions helpful and if you would like to discuss any areas of our response, please do not hesitate to contact Keisha Patel³ or Molly Fraser⁴.

Note, our response is non-confidential and we are happy for it to be published by Ofgem as appropriate.

Yours sincerely,

Peter King

Vice President, Global Head of Energy and Utilities

List of enclosures: Appendix 1 – Response to Consultation Questions

¹ <https://www.hfsresearch.com/research/capgemini-energy-and-utilities-services-capabilities-2025/>

² <https://www.capgemini.com/insights/research-library/world-energy-markets-outlook/>

³ keisha.patel@capgemini.com

⁴ molly.fraser@capgemini.com

Appendix 1: Response to Consultation Questions

Consumer Outcomes

Q.1 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?

When considering the most significant issues faced by participants and consumers in the GB energy market, we have identified three areas we believe Ofgem should prioritise when updating regulatory frameworks for energy suppliers. The three key areas below outline what we view as being important for both the consumer and energy supplier.

1. **Consumer affordability and growing energy costs:** Energy bills and affordability for both domestic and non-domestic consumers we view as the most important factor for Ofgem to consider prior to regulatory updates. Consumers will expect regulatory updates to improve affordability or at the very least not lead to more expensive energy bills. Negative consequences of regulatory changes would further impact consumers that are struggling with energy bills and could cause suppliers to deprioritise growth and Net Zero-focused innovation.
2. **Impact of increased regulatory burden on suppliers and consumers:** We believe expanding the regulatory scope will create additional compliance costs and increase operational overheads for suppliers. We believe these costs will then be pushed downstream to consumers, a facet we believe is not aligned with Ofgem's consumer interest duties.
3. **Allocation of risk across the energy system:** We suggest that a change to the regulatory framework must consider an equal distribution of 'risk' across the GB energy market. Energy suppliers already hold a significant level of operational and regulatory risk being the focal point for consumer facing obligations under the supplier hub model. A regulatory approach which places disproportionate responsibility and risk on energy suppliers could create new vulnerabilities within the market such as those outlined in our second point. We believe an equitable distribution of risk across market participants, and clear guidance on who obligations lie with could facilitate the growth and innovation of the market, whilst enabling sustainable exploration to achieving Net Zero Goals.

Having suppliers solely responsible for consumer outcomes could increase disproportionate regulatory burden and consequently harm affordability and supplier spending on innovation.

Q.2 Why do you think there is such a divergence of satisfaction rates across different consumer cohorts?

To explore reasonings behind differing satisfaction rates we have focused on domestic and non-domestic consumers. Whilst we acknowledge the use of differing sampling and research methodologies employed, the evidence from published 2025 Ofgem reports outline differences in the volume of consumers satisfied with their service from energy suppliers. Domestic consumer satisfaction of customer service sat at 74% as of 2024⁵, and evidence suggested that just 62% of non-domestic businesses were satisfied with services from their energy supplier⁶.

Non-domestic consumers

1. **Data accessibility:** We believe a portion of non-domestic consumers are experiencing inconsistencies across billing and energy payment information which could be contributing to low satisfaction with the service's received. Despite overall high levels of satisfaction with billing, statistical evidence suggests differing satisfaction rates with billing accuracy and information across different sizes/types of non-

⁵ <https://www.ofgem.gov.uk/research/energy-consumer-satisfaction-survey-january-2025>

⁶ <https://www.ofgem.gov.uk/research/non-domestic-2024-research-report>

domestic consumers. For example, of the non-domestic consumers stating high understanding of their energy bills 88% of which were large businesses at the time of reporting⁶.

2. **In-direct interactions:** Non-domestic consumers may often engage in energy procurement using third party intermediaries (TPI). Whereas for domestic consumers, the main point of contact is energy suppliers. Non-domestic consumers will engage with entities such as TPIs who Ofgem at present despite future intention to do so, cannot regulate as effectively as suppliers in the GB energy market ⁷.
3. **Innovation:** Technology, and customer service tools developed for domestic consumers may not always translate to the complex, intermediary-driven interactions that non-domestic consumers face. We believe a gap has emerged in the pace of innovation and technological advancements across the two consumer cohorts.

Domestic consumers

1. **Misalignment of expectations:** We believe consumer expectations have increased in recent years, around the standard and quality of customer service expected from energy suppliers. Data from previous years suggest the time taken to settle queries, lack of timely communication with the supplier, and a perceived lack of acknowledgment were key detractors of satisfaction for domestic consumers⁸. Whilst improvements are evident, it is possible energy suppliers current resources for customer service face challenges to progress with the pace of growing expectation for speed, accuracy and empathy consumers look for.
2. **Consumer debt:** We believe rising energy bills continue to be one of the most significant drivers of dissatisfaction in the domestic consumer cohort with evidence outlining 46% of the 6% of domestic consumers dissatisfied with their supplier citing energy prices as the cause in 2025⁵. We see quantifiable evidence to support pricing and affordability remaining a key driver of dissatisfaction.

We believe the divergences across the quality of communication, and the accessibility of information are significant factors in the differing satisfaction rates. A shared driver of dissatisfaction we believe to be energy bills.

Q.3 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?

Whilst we agree the proposed outcomes address key consumer protections, their number, scope and allocation solely to energy suppliers requires further refinement to ensure they are practical and deliverable.

Placing comprehensive responsibility on energy suppliers alone does not adequately reflect the shared role that network owners, TPIs, and other market participants have in shaping consumer outcomes. Therefore, whilst we believe the outcomes do cover key consumer expectations, they must be distributed accordingly across market participants to ensure those best placed to deliver the outcomes are responsible.

Q.4 Do you think we should streamline or consolidate the Consumer Outcomes further and, if so, which should we prioritise?

We agree that consolidating the listed consumer outcomes would offer meaningful benefits for all market participants. Consolidation would simplify and clarify expectations, making delivery of the outcomes more feasible.

We have outlined three areas from the outcomes we view as the most important for consumer experience and protection:

⁷ <https://www.gov.uk/government/consultations/regulating-third-party-intermediaries-tpis-in-the-retail-energy-market/outcome/regulating-third-party-intermediaries-tpis-in-the-retail-energy-market-government-response-accessible-webpage#next-steps>

⁸ <https://www.ofgem.gov.uk/press-release/new-data-shows-suppliers-must-improve-customer-service>

1. **Debt and fair prices:** We believe the outcomes should create clear expectations and guidance on how market participants should support fair pricing, manage debt responsibly, and ensure adequate protection for all consumers, particularly those classed as being vulnerable.
2. **Quality, standards and security of supply:** All consumers are entitled to expect a reliable supply of energy which should be accompanied by accessible, effective support and resolutions should an energy supply face challenges. We believe support such as this falls under the scope of guaranteed standards of service.
3. **Enhanced protection for vulnerable consumers:** Protection for vulnerable consumers must be a priority for all GB energy market participants. Whilst this refers to domestic consumers, outcomes related to vulnerability should be considered for consumers supplied through a non-domestic contract as well. For example, living in sheltered housing, apartments attached to a business, and tenants on all-inclusive rents.

In addition to consolidation, the outcomes should consider the fair allocation of risk to prevent disproportionate responsibility being imposed upon energy suppliers. We believe it is important to have clear guidance on how those responsible for upholding the consumer outcomes can measure their success or lack thereof to ensure commitments are being upheld. Please refer to our answer in question 16 which contains further details on the topic of effective monitoring.

Q.5 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?

While the explanations provided offer some insight into the intent behind the consumer outcomes, we do not believe they are sufficient to justify how the outcomes will be achieved. The emphasis on consolidating outcomes in this call for input suggests that current explanations do not adequately address concerns around complexity and overlap, reinforcing the need for fewer, clearer outcomes.

Significant concerns were raised about the practicality of measuring these outcomes, as well as consistency of monitoring and enforcement in practice. If outcomes-based regulation is retained, these challenges must be addressed to ensure that the framework is both workable and effective.

Finally, a joint approach combining detailed rules with overarching principles could inadvertently increase cost, complexity, and regulatory burden, rather than delivering the intended simplification. This risk underscores the need for a more streamlined and coherent approach to defining and explaining consumer outcomes.

Q.6 Why do you think these outcomes are not materializing consistently for all consumer groups given that they are in line with our existing rules?

A key challenge to achieving the stated outcomes – particularly those relating to debt management and fair prices is the practical difficulty of implementation and enforcement. Certain outcomes, such as sustainable debt repayment, are inherently difficult to achieve due to consumer financial constraints and, in some cases, a lack of adequate protection. These structural and practical limitations mean that even when rules are aligned with the intended outcomes, achieving them uniformly across all consumer groups remains problematic. To address this, monitoring should take into account suppliers underlying portfolio characteristics (*e.g., percentage of consumers on prepayment meters, levels of affluence, and other demographic factors*). This approach would provide greater insight into the challenges faced by different suppliers, identify best practices, and help drive improvements in delivery across the market.

Q.7 Do you think some outcomes are more important for consumers than others?

Yes, some outcomes are more important for consumers than others, particularly those that address affordability and deliver immediate impact. Reducing consumer bills will be the most important outcome for the consumer as affordability is a fundamental concern for all consumer groups, and different cohorts have varying levels of vulnerability. For example, vulnerable consumers often face acute financial pressures, making outcomes that provide short-term relief far more critical than those focused solely on long-term benefits.

Consumer billing must reflect the true economic circumstances of each consumer cohort. Outcomes that deliver immediate, tangible benefits such as cost reductions or improved billing transparency we view as essential for maintaining trust and ensuring fairness. Conversely, outcomes aimed at long-term improvements, while important, may not resonate as strongly with consumers who are struggling with immediate affordability challenges.

Additionally, it is vital to ensure outcomes are tailored to support vulnerable consumers. This includes designing measures that prevent inequalities from widening between vulnerable and non-vulnerable consumers. A fair and inclusive transition requires prioritising outcomes that address affordability, accessibility, and protection for those most at risk. At the same time, it should also recognise that some consumers are less concerned with affordability and place greater importance on other aspects, such as carbon emissions, sustainability, and environmental impact. For these consumers, outcomes that promote decarbonisation, energy efficiency, and green innovation may hold greater value than cost-related measures.

In summary, while all outcomes have value, those that directly impact affordability and provide immediate benefits should be prioritised to meet the diverse needs of consumers and ensure equitable treatment across the market.

Q.8 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?

Yes, there is an opportunity for outcomes to be applied more broadly across market participants, particularly where data and technology can act as key enablers. Open, shareable datasets and smart metering are essential to empower consumers and third parties, such as Distribution Network Operators (DNOs), to make informed choices. Better data access and robust data-sharing agreements should be a priority to ultimately achieve cheaper bills and improve consumer outcomes.

Additionally, creating a centralised repository for market opportunities and asset registers would allow third parties to aggregate and present options to consumers in a clear and accessible way. This would enhance transparency, enable comparison tools, and support informed decision-making across the market.

There is also significant potential to increase market participants access to new revenue opportunities - such as flexibility markets - without requiring consumers to fundamentally change how they engage with the system. For these benefits to be realised at scale, participation must be automated, seamless, and enabled by interoperable data and technologies.

Q.9 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.

The outcome-based approach is preferable over a voluntary approach, as it removes subjectivity and provides clearer accountability. However, for this approach to be effective, a central body would be required to monitor compliance, engage in data collection, and oversee enforcement.

Key considerations include ensuring that monitoring focuses on what can be controlled and measured, with outcomes linked to these areas. When determining what is controllable and measurable, it is important to account for underlying market conditions and resource constraints faced by suppliers. This will help ensure that expectations remain realistic and proportionate.

Q.9a 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?

In the non-domestic energy sector, we believe the focus should not primarily be on traditional customer service as seen across interactions with domestic consumers given interactions are often distributed across various TPLs. Instead, initial intervention should target improving data standardisation and accessibility in key areas such as billing. Consistent data-sharing practices could enhance transparency and trust for non-domestic energy consumers. We believe a secondary action could be assessing mechanisms to reduce energy bills for all non-domestic consumers.

Q.10 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?

A voluntary approach could face significant challenges, particularly where suppliers operate under difficult market conditions that require resource reallocation to maintain business viability. These constraints may limit their ability to consistently meet all outlined outcomes, creating potential negative impacts for suppliers.

To address this, we suggest introducing a code of practice as a foundational framework. This code would set out basic or minimum expectations applicable to all suppliers, ensuring a consistent baseline of consumer protection and service. The code could then allow for progressive enhancement over time, enabling flexibility to accommodate supplier-specific challenges while maintaining accountability.

Such an approach would provide clarity, reduce subjectivity, and foster industry-wide alignment without imposing the full burden of formal regulatory change. It would also create a mechanism for transparency and public commitment, helping to build trust and confidence among consumers and stakeholders.

Q.11 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.

We are in favour of moving toward a more outcomes-based regulatory framework, as it offers the potential to provide regulatory flexibility, encourage innovation, and better align regulation with consumer needs. By focusing on the results rather than prescriptive rules, suppliers can explore innovative solutions and tailor approaches to deliver meaningful benefits for consumers.

However, there are challenges that must be addressed for this approach to succeed. Among these is the cost and complexity of measurement and monitoring. For some outcomes, the expense of developing robust monitoring mechanisms may outweigh the benefits, creating a risk that high compliance costs could stifle innovation and growth rather than promote it.

To mitigate these risks, an outcomes-based framework should be complemented by practical enablers, such as:

1. Improved data-sharing frameworks to support transparency and informed decision-making.
2. Standardized reporting mechanisms to ensure consistency and comparability across suppliers.
3. Proportionate compliance measures that avoid imposing excessive costs on market participants.

These steps would help ensure the framework remains practicable, cost-effective, and conducive to innovation. For example, enabling smart metering and centralized data platforms could unlock dynamic pricing models and energy efficiency solutions, driving both consumer benefit and market growth.

Q.12 Are there specific licence conditions where less prescription could benefit the retail market without compromising consumer protection?

Capgemini will not offer a response at this time given we feel the question does not directly relate to our capacity as an interested party.

Q.12a) For suppliers: are there any areas where you find guidance helpful or unhelpful?

Capgemini will not offer a response at this time given we feel the question does not directly relate to our capacity as an interested party.

Q.13 Are there areas where prescriptive rules should remain in place? If so, why?

Whilst we believe that a balanced regulatory framework should incorporate a mix of outcomes based, principles based, and prescriptive based measures, there remain three areas where we view prescriptive rules as appropriate particularly where consumer protection is concerned and where ambiguity could lead to harm or weakened standards. We have listed three of these key areas below.

1. Consumer protection

2. Security of supply
3. Guaranteed standards of service

We believe clear and enforceable requirements provide certainty for both consumers and market participants by ensuring that minimum protections are upheld consistently across the sector. Prescriptive rules with clear guidance in the three outlined areas stating how market participants are expected to achieve the outcomes could reduce the risk of non-compliance due to misinterpretation of market obligations. Whilst we have outlined our reasoning to support prescriptive rules in a specific set of outcomes, please refer to our response in question 14 which outlines our view on a framework for a balanced and monitorable set of outcomes.

Q.14 What factors should we consider to determine whether specific rules are best delivered through prescription, principles or outcomes?

A proportionate combination of principles, outcomes, and prescription based regulation would ensure clarity where there is a clear right and wrong while allowing flexibility where tailored approaches are needed to accommodate market participants distinct operations. Grouping rules into three defined categories as outlined below we believe offers a more feasible and practical framework for delivery (*please see question 13 to outline where a caveat exists*).

When considering the delivery and monitoring of the rules we propose the following.

1. **Principles** would outline why the obligation exists. We believe the rules or outcomes of this nature would set an overarching intent and provide direction without outlining specific actions.
2. **Prescriptive** would detail how the action should be achieved. Rules of this nature we believe as previously mentioned should exist for consumer protection, security of supply, and guaranteed standards of service.
3. The **outcomes** would create a measurable end goal for market participants to work towards. The flexibility that outcome or principle based rules offer would be preferable for innovative activities, allowing for unique actions to achieve an end goal. Communication activities could be best suited for outcome based monitoring given the means in which energy suppliers contact consumer cohorts will differ across the market.

We believe grouping the outcomes and rules would increase the likelihood of achieving the intended objectives.

Q.15 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.

While the two options presented (*Supplier reporting or Ofgem reporting*) offer potential pathways, we believe an alternative approach would be more effective.

We recommend introducing a centralised body to act as an intermediary between suppliers and Ofgem. This body would create a streamlined data flow structure, ensuring consistency and transparency in reporting. It would have access to the same data permissions as both suppliers and Ofgem, enabling it to engage in monitoring and verification activities based on the data received. In so far as possible, monitoring data would be sourced from central systems to minimise reporting burden on market participants.

To ensure credibility and accuracy, this centralised body should operate under a clear mechanism for data verification, which includes:

1. Accessing data in an accurate and standardized format
2. Providing an unbiased view of supplier performance
3. Engaging in accurate and transparent reporting to stakeholders

This approach addresses concerns around placing the sole reporting obligation on suppliers, which could lead to increased costs and operational burdens. By introducing shared responsibility, suppliers would still be required to provide high-quality data, but the centralised body would ensure consistency, reduce duplication, and enhance confidence in the monitoring process.

In summary, a centralised monitoring framework supported by robust data verification processes would deliver a more effective, fair, and transparent approach than relying solely on supplier or Ofgem reporting.

Q.16 How do we best measure our success as to whether we have:

Q.16a) Improved consumer outcomes and achieved our ambitions for customer service and

The employment of an ombudsman, or central market body to oversee the monitoring of performance against measurable consumer outcomes and ensure accountability across the market participants we believe is the optimal action to measure success. However, the central market body would be pivotal in ensuring the monitoring activities do not create operational or financial risk for market participants (*please refer to our response in question 15*).

Key areas a central market body/ombudsman could measure include:

1. **Consumer complaints against market participants:**
 - Volume of complaints received
 - Type of complaint received (*e.g. billing, supply, communication*)
 - Time and type of resolution action taken to address the complaint
2. **Consumer debt (*where appropriate*):** Possible measurement to assess affordability, financial support in place for consumers, and the systems in place to support the financially vulnerable.
 - Levels of consumer debt
 - Trends in arrears or repayment plans
 - Effectiveness of supplier interventions to prevent or mitigate debt

An unbiased central body to oversee and analyse performance metrics would ensure the outcomes have been successful in improving customer service without detriment to the wider energy market.

Q.16b) Reduced regulatory burden and encouraged growth and innovation

We believe the scope of outcomes, and the ensuing expectations could create subjectivity and ambiguity when assessing innovation and growth. Market participants operate under different financial circumstances and serve consumers with differing needs, therefore applying uniform metrics such as solely prescriptive rules could place undue pressure on energy suppliers. This reinforces our view that an impartial central market body should assess market participants, in particular suppliers innovation and growth.

Unlike customer service where clear metrics can be obtained, innovation and growth are subjective and unique to each market participant. It is feasible for a central body to apply a flexible assessment approach similar to the concept of distribution network operators (DNOs) innovation funds. The central body could monitor how market participants use the funds to support innovation and growth activities rather than imposing fixed targets which do not consider unique operations and would increase the risk of regulatory burden.

Q.17 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?

Capgemini will not offer a response at this time given we feel the question does not directly relate to our capacity as an interested party.