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Re: Consumer Outcomes Call for Input

Thank you for providing the opportunity to respond to this Call for Input (CFI). We welcome this further engagement following the workshops held earlier this year. This provides a more comprehensive basis on which to share our thoughts ahead of any further consultation from Ofgem.

Within Annex 1 we have provided answers to the specific CFI questions.

We are committed to engaging collaboratively with Ofgem to help progress towards a regulatory framework that works for consumers, energy suppliers and industry parties, by offering innovation and consumer protection, together with commercial viability and a successful transition to net zero.

However, as currently proposed, the twenty-four Consumer Outcomes would add complexity to any regulatory framework. We believe that focusing on a small number of high-level principles would better help Ofgem achieve its desired outcomes.

We believe the 'hybrid approach' could be the most effective because it balances flexibility with necessary safeguards. However, Ofgem should explore complementary methods such as integrating outcomes into Standards of Conduct (SoC) and using reputational incentives through self-reporting. Any monitoring framework must avoid unnecessary duplication, reduce administrative burden, and provide clarity on expectations. Ultimately, the goal should be a proportionate, collaborative approach that protects consumers without imposing excessive costs on suppliers.

We believe a streamlined outcomes framework that replaces certain prescriptive rules where duplication exists, while maintaining essential prescriptive elements for high-risk areas is most likely to work for consumers, suppliers and industry. Clear guidance and intent statements for each outcome would remain critical to ensure consistent interpretation.

We also believe that, as currently drafted, there is a possibility that different outcomes to the Consumer Outcomes set out in this call for input could be applied to wider market participants (e.g., Third Party Intermediaries or load controllers). As a principle, outcomes should apply to all market participants which interact with consumers, because outcomes matter to any customer interaction across the industry.

Executive Summary

Ofgem should firstly consider what standard of Consumer Outcomes (Outcomes) it is looking to achieve. Not all customers want or require the same level of customer service, and this diversity should be reflected in the approach.

There needs to be consideration within the Outcomes process around how much responsibility lies with suppliers versus the wider industry and government e.g., external factors such as cost-of-living influence outcomes and should be acknowledged. We recommend that Ofgem conducts a full Regulatory Impact Assessment, applies its Evaluation Strategy and reviews current areas of guidance as part of this work. Where the review of Ofgem's regulatory framework has the potential to drive additional costs into suppliers' operating models, these costs will need to be considered within the constraints of a price-capped environment.

Market forces should be allowed to operate freely, enabling genuine consumer choice. Removing unnecessary obstacles will support switching and competition, as outlined in the Government's Growth Duty¹. Corporate organisations need flexibility to innovate and grow, making the sector investible without replacing old constraints with new ones. Unnecessary regulation should be removed and applied only where needed to protect consumers, particularly those in vulnerable situations and in debt. We urge Ofgem, along with the Government, to continue its pursuit of wider data sharing to enable suppliers to support consumers in vulnerable situations, whether these situations are ongoing, situational or temporary.

Furthermore, Ofgem's statement that 'RFIs won't go away' appears inconsistent with government objectives to reduce regulatory red tape, and this tension should be resolved. This message was more recently reinforced by Rachel Reeves, Chancellor of the Exchequer on 7 January 2026, where regulators were urged to 'go even further and act boldly' to remove barriers to business as a stagnant economy is the biggest risk to consumers and taxpayers. Ideally, RFIs should not remain a routine part of regulatory practice but only be initiated where Ofgem is conducting a time-limited project to assess performance against a particular outcome or requesting an individual licensee to demonstrate its performance.

A cultural shift is much needed, and indeed, long overdue within Ofgem to enable the successful move from prescriptive regulation to a Consumer Outcomes regulatory framework. For example, the FCA publishes reports for each participant without drawing comparisons or taking compliance action, allowing stakeholders to identify best practices independently. DESNZ and Ofgem should actively promote and support any changes publicly along with a wider education piece on net zero, which is essential to enable suppliers to engage customers effectively and communicate the overarching vision.

Some decisions necessary for sector improvement may cause short-term dissatisfaction, such as the introduction of industry-wide levers that limit customer choice in relation to smart meter adoption. These steps are critical for resilience and the journey to net zero. We would also like Ofgem to share more of its research and analysis that informed the proposed Consumer Outcomes. There are concerns about the applicability of some outcomes to the non-domestic market, which should be addressed. The framework must be specific and measurable, and compliance and enforcement should reflect diverse approaches which suppliers may take to achieve good outcomes.

Reporting requirements should not be onerous, and we welcome a review to ensure proportionality. The energy industry is evolving rapidly, and outcomes should allow space for technological development and innovation.

For the next steps of the process, we ask Ofgem to include:

- The introduction of regulatory changes with sufficient lead time.
- Reduce the number of consumers outcome headings to a much shorter list of between 5-10.
- Conduct regulatory and financial impact assessments for each proposed outcome, along with a commitment to evaluate and amend the revised regulatory framework changes.
- Remove layers of regulation / duplication of existing conditions and consider consolidating into streamlined, outcome-based requirements.
- Publish the Supply Licence Conditions (SLC) overlay and introduce a clear overarching principle for good customer outcomes.
- Define key terms and measurements (e.g., 'excessive pricing', 'compassionate support', 'inclusivity' in non-domestic, and 'sustainable' debt).
- Recognise where there are shared controls and dependencies (network costs, DESNZ interventions) and apportion responsibility accordingly.
- Embed broker accountability into the non-domestic scope.

¹ [final_growth_duty_statutory_guidance_2024.pdf](#)

- Strengthen resilience through regulatory capital protections and proportionate new-entrant requirements to minimise Supplier of Last Resort (SoLR).
- Provide practical pathways for digitally disengaged customers alongside innovation, with Hive-style proactive tools to improve debt sustainability and fair pricing.

Finally, we suggest that Ofgem adopts a granular, thematic approach rather than implementing all outcomes simultaneously.

I trust the responses we have shared will be helpful in shaping a collaborative way forward, with consumers at the forefront of development and thinking. If you would like to discuss any part of this response further, please don't hesitate to contact Amanda.Nolan@centrica.com in the first instance.

Yours sincerely

A handwritten signature in blue ink, appearing to read "N. Howard".

Nigel Howard
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Annex 1 Responses to Questions

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?

Updating the regulatory framework for retail energy suppliers requires a careful balance between consumer protection, commercial viability, and the achievement of net zero goals. A key consideration is moving towards true outcome-based regulation, which focuses on a small number of high-level principles. Currently the Outcomes include twenty-four lower-level descriptions which leans towards prescriptive rules and is unlikely to result in improvement to the overall framework. Having an approach of a few high-level principles would allow suppliers the flexibility to innovate and deliver good consumer outcomes without being constrained by conflicting or overly detailed requirements.

Consumers should retain the ability to choose what matters most to them - whether this is price, service, or product - whilst market forces are allowed to operate effectively.

Considerations for updating the regulatory framework

- Regulatory changes should be introduced with sufficient lead time and not subject to frequent review or reversal, as uncertainty can deter suppliers from committing resources. Such a shift in regulatory framework should include a full Regulatory Impact Assessment and be subject to Ofgem's Evaluation Strategy².
- Each change for each proposed heading should be supported by impact assessments and include a test-and-learn phase to evaluate practical implications before full implementation, including Ofgem's Evaluation Strategy.
- Avoid creating layers of regulation or duplicating existing licence conditions and consider consolidating its overarching principals into streamlined outcome-based requirements and reducing licence requirements or other codes or guidance.
- Ensure any enforcement plans and interpretations are communicated early to suppliers.
- Prompt approval of any changes in approach will help suppliers proceed confidently and efficiently.

The framework must also support innovation and growth by minimising onerous reporting obligations and ensuring oversight remains proportionate and streamlined.

Cost implications in a price-capped environment should be carefully assessed to avoid unintended financial strain on suppliers and incorporated into the price cap model. This should be based on a robust impact assessment and should also consider the impact on suppliers' financial resilience, as outlined in Ofgem's Impact Assessment Guidance.³

For the non-domestic market, Ofgem should recognise that the scope of regulation differs from the domestic market and that this was recently addressed through the non-domestic market review. Differences in regulatory scope are the result of structural differences between the domestic and non-domestic energy markets and changes to underlying regulations should not be in scope of the Consumer Outcomes programme. In practical terms, to set appropriate non-domestic outcomes, Ofgem will need to consider the challenge of defining uniform outcomes for the diverse non-domestic customer base alongside the impact of third-party intermediaries.

The updated framework should prioritise simplicity, stability, and flexibility, enabling suppliers to deliver positive consumer outcomes and contribute to net zero objectives while maintaining a viable and competitive market. Ofgem should remain mindful of the law of unintended consequences and the cumulative effect of multiple regulations, ensuring that the framework is clear, proportionate, and future proof. Ofgem should focus upstream on supplier resilience and capital adequacy.

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

² [Ofgem's Evaluation Strategy](#)

³ [Impact Assessment Guidance](#)

The divergence of satisfaction rates across different customer cohorts is a complex area and satisfaction is not solely a reflection of supplier performance but is deeply intertwined with wider energy market developments, financial circumstances, demographic factors, and market complexities. While suppliers can improve customer service experiences, broader economic conditions and structural factors will continue to drive differences in satisfaction across cohorts. This suggests that regulators like Ofgem may need to consider these external influences when assessing supplier performance.

For domestic customers, financial hardship plays a significant role in shaping overall customer opinion. Debt, and broader financial worries, which extend beyond the control of energy suppliers, heavily influence how consumers perceive and interact with their providers. Customers on low incomes are often more sensitive to issues like standing charges and may be more likely to complain, which naturally impacts satisfaction scores. Conversely, consumers who are able to pay bills more comfortably, are unlikely to experience the stress and additional cost of debt recovery.

Ofgem's recent Customer Satisfaction (CSAT) data⁴ reinforces this, showing that renters, digitally excluded individuals, those with household incomes below £21k, people living in flats, and those with disabilities report higher dissatisfaction. These groups are more likely to be financially vulnerable, and key driver analysis confirms that financial vulnerability is the strongest predictor of overall satisfaction when other factors are controlled.

Regional and demographic differences also contribute to this divergence. For example, areas like London have a higher proportion of renters, which creates a different customer experience compared to regions with more homeowners. Payment methods further influence satisfaction, e.g., customers using prepayment meters often face a more complex journey than those paying by direct debit, which can lead to frustration. A supplier with a higher PPM customer base could therefore be unduly impacted when compared to a supplier with a higher DD customer base.

In the non-domestic market, the picture is equally complex. Satisfaction rates vary widely due to the broad range of customer sizes and types, making benchmarking difficult. Pricing is a key driver of satisfaction here, and because it is often influenced by external factors, suppliers have limited control. The involvement of third-party intermediaries (TPIs) adds another dimension - while customers may be satisfied with the supplier's service, dissatisfaction from TPIs can skew overall results. Furthermore, non-domestic customers tend to be more engaged which can lead to higher reported dissatisfaction even when service levels are objectively strong.

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?

Overall, the Outcomes are directionally sensible and broadly reflect what consumers expect from energy suppliers - particularly around fair pricing, quality & standards, and debt. These three areas are the most immediate and tangible for consumers and therefore resonate most strongly. By contrast, outcomes such as resilience and low-cost transition are vital for market stability and net-zero delivery, yet they sit further from the day-to-day customer experience and are not always at the forefront for consumers. This mix suggests the outcomes do cover important expectations, but their perceived relevance differs depending on whether you view them through the lens of immediate consumer needs or the market.

A significant practical concern is the absence of transparency about how the outcomes overlay existing SLCs and whether there are any areas of the outcomes that widen the scope of the current licence. Ofgem has indicated it has done this overlay but not shared it. We ask that Ofgem provides the detail of this overlay to suppliers so that it is clear what changes are being proposed against the different regulations. Where Ofgem is proposing an expansion (or contraction) in the scope of regulation a transparent and meaningful consultation is required.

It is also important to acknowledge that not all drafted outcomes are within suppliers' control. For example, under the heading of 'fair prices', both wholesale market costs and non-commodity costs (e.g., distribution / network charges) feed into bills, and price caps constrain retail decisions.

⁴ [Energy Consumer Satisfaction Survey: July to August 2025 summary | Ofgem](#)

It is important that Ofgem avoids increasing the scope of pricing regulation through its revised regulatory framework and avoids introducing new undefined and duplicative terms, which is counterproductive. Indeed, we are supportive of further evolution of the price cap such that it better encourages investment and innovation.

In the non-domestic market pricing is negotiated, largely unregulated (except for deemed contracts), and the meaning of 'excessive' is materially different from domestic (where it is not particularly meaningful either). Channel-based pricing, cost-to-serve variation, and customer segment differences make 'fairness' multi-dimensional and not reducible to margin alone. 'Value' is more than price - product design, service quality, and risk management also matter. Clarifying what 'excessive pricing' means (domestic vs. non-domestic), how it would be measured, and how outcomes interact with DESNZ smart contingent contracts would reduce ambiguity and support consistent application.

We have set out below points for consideration on the different Outcomes.

Debt

- What does 'sustainability to pay' look like for non-domestic customers where cash-flow variability and bespoke agreements are common?
- What is a 'sustainable debt repayment' and how should suppliers balance commercial recovery with reasonable customer expectations - especially when customers resist payment plans that allow cost recoupment?

Fair Prices

- We suggest that Ofgem removes references to excessive pricing, as this duplicates the existing price cap regulation. And for non-domestic, Ofgem should provide separate Outcomes which reflect the scope of price regulation which exists already.
- For non-domestic, the terms 'fairness' and 'excessive' doesn't have the same meaning in a negotiated market and Ofgem will need to factor this into the Outcome. There is currently no pricing regulation in non-domestic (with the exception of deemed) so the Fair Prices outcomes appear incremental.
- Domestic and non-domestic non-commodity costs are not within the supplier's control. Distributor network costs also need to be considered; not all are within suppliers' control.

Quality & Standards

- 'Transparency and choice' remain desirable, but practical measurement should account for the reality that not all products can be suitable for everyone. Clarifying 'at a time that meets consumers' needs' and defining 'compassionate support' would be helpful.
- Outcome 12's⁵ consistency with DESNZ's smart contingent contract approach should also be reviewed to avoid policy friction.

Low-cost transition

- Outcomes 14⁶ and 15⁷ could infer that responsibility sits wider than that of suppliers. As referenced earlier in this response, the relevant parties servicing customers should be held accountable for consumer outcomes within their own remit, without shifting responsibility completely onto suppliers.
- Consumers often see the supplier as the start and end point, overlooking the role and cost of distribution and central systems (e.g., Data Communications Company (DCC)). Achieving a low-cost transition requires government and regulator participation in wider strategy and communication - a coherent vision of net zero and consistent public messaging - and then suppliers can amplify and deliver it through products, technology, and tailored comms.

⁵ Quality and Standards – Customers should not be unnecessarily prevented from being able to switch energy supplier despite product or technology purchased or inherited.

⁶ Consumers understand how they are contributing to and benefitting from net zero products or services obtained via their supplier.

⁷ Consumers who choose to engage can and are supported by suppliers who remove barriers within their control.

- More technology can mean more complexity, and responsibilities (i.e., within / out of supplier control) need to be clearly defined.
- Practical questions, for example, how to mitigate 'unexpected risk,' who is accountable for which tech components, and how to support customers who are not digitally engaged or educated, should be addressed explicitly.
- For digitally disengaged customers, suppliers will need to maintain non-digital channels, provide plain-language resources, and offer assisted journeys (e.g., telephone support, community outreach, and simple opt-in notifications) alongside digital tools.
- Ofgem's proposals that non-domestic suppliers should 'ensure that the customers are informed of the limits of suppliers' control' duplicates requirements that should be placed directly on third party intermediaries as a result of forthcoming direct regulation of this sector. Placing requirements on suppliers in relation to TPI conduct should be avoided as it creates overlapping and duplicative regulation.

Resilience

- The onus should not sit solely with suppliers. There are clear Ofgem and government responsibilities, including the implementation and enforcement of the financial resilience framework and supplier of last resort processes that prevent disorderly exits.
- We strongly support outcome 19 which sets out that consumers should be confident that they are dealing with financially resilient suppliers. However, we recognise that this is an area where the current licence and associated guidance fall short because it does not require suppliers, or Ofgem, to provide customers with information on a suppliers' financial resilience.
- Outcomes 21⁸ and 22⁹, in our view, are clearly not for suppliers and should therefore be removed, which will support the streamlining of the Outcomes overall.
- To build market resilience and support the net-zero journey, suppliers may need to make commercially prudent decisions that customers do not immediately welcome, such as limiting customer choice in relation to smart meter adoption, to unlock flexibility and accurate billing. However, ensuring suppliers have adequate capital and financial resilience so they do not fail, and trigger SoLR events is squarely within the regulator's remit.
- Many resilience outcomes read more like regulatory outcomes requiring industry-wide management and consistent enforcement, which historically has been uneven, contributing to supplier failures.
- We agree with some of the resilience objectives, but Ofgem must implement and enforce a robust financial resilience framework to achieve these outcomes. Although there is duplication with existing licence conditions, we believe this prescription should remain. Preventing repeated cycles of market exits and SoLR must be a shared responsibility.

Vulnerable Customers

The proposed Consumer Outcomes broadly reflect the most important expectations consumers have of energy suppliers, particularly in relation to vulnerability. They capture key principles such as fair treatment, clear communication, and proactive support, which are essential for ensuring that vulnerable customers receive appropriate protections.

However, we believe there are areas where further refinement could strengthen the framework:

- Some outcomes are high-level and may benefit from clearer definitions or practical examples to ensure consistent interpretation and application across suppliers.
- To drive accountability, outcomes should be supported by measurable indicators. Without clear metrics, it may be challenging to assess whether expectations are being met.
- Vulnerability is often temporary or situational. Outcomes should explicitly encourage flexibility and responsiveness to changing customer circumstances. Ofgem and the Government should continue to pursue avenues to enable more data sharing, which will help suppliers to deliver the right support to those who need it.

⁸ Consumers benefit from fair prices, improved quality of services, and lower cost delivery of net zero as the sector attracts sufficient investment.

⁹ Consumers benefit from licensees which are adequately resourced, demonstrating the right balance between resilience and innovation.

- While the principles are strong, consideration should be given to the operational impact on suppliers, particularly smaller providers, to avoid unintended consequences that could limit support.
- Outcomes should also address how customers are informed about their rights and available support, as awareness remains a common gap.
- Ofgem, along with the Government, should continue to identify appropriate sources of data sharing, which will enable suppliers to further support, and direct the appropriate support, to those consumers who need it most.

Overall, the outcomes provide a solid foundation to develop a clear, simple and low-burden regulatory framework that continues to protect consumers, while empowering suppliers to compete and innovate with new products and services to deliver great outcomes for consumers now and in the future. But success will depend on how they are operationalised, monitored, and adapted over time to deliver meaningful improvements for those who need them most.

- We agree that the proposed vulnerability outcome should not be applied to non-domestic customers, as Ofgem notes in Appendix 3. Vulnerable Situation as a defined term does not exist in the context of the non-domestic supply market and this difference in regulatory scope should be maintained.
- The proposed Outcomes do not mention the role of non-domestic brokers (involved in 70–80% of non-domestic sales). This is a critical gap. Broker conduct directly shapes customer outcomes in pricing, product selection, and transparency. The framework should explicitly account for broker responsibilities and oversight mechanisms to ensure that suppliers remain accountable for delivering outcomes that are within their control.

In summary, the outcomes are a strong step toward a fairer, customer-focused energy market, but they need refinement. We recommend Ofgem:

- Publishes the SLC overlay and introduces a clear overarching principle for good customer outcomes.
- Defines key terms and measurements (e.g., 'excessive pricing', 'compassionate support', 'inclusivity' in non-domestic and 'sustainable debt').
- Recognises shared control and dependencies (network costs, DCC, DESNZ interventions) and clarifies what sits with suppliers vs. regulator / government.
- Embeds broker accountability in the non-domestic scope.
- Strengthens resilience through regulatory capital protections and proportionate new-entrant requirements to minimise SoLR.
- Provides practical pathways for digitally disengaged customers alongside innovation, with Hive-style proactive tools to improve debt sustainability and fair pricing.

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

Yes, we think the Outcomes could be consolidated, as twenty-four Outcomes adds unnecessary complexity. We would suggest splitting into three areas:

1. Ofgem/Market goals.
2. Supplier influence.
3. Combination of the above - influenced by wider market and outside pressures.

Currently as proposed, we believe the Outcomes are still venturing into aspects of process rather than true outcomes and there are a number of conflicts amongst the Outcomes e.g., some consumer protections are likely to lead to an increased cost to serve (going against the outcome to keep costs low) and places more risk on keeping the market sustainable. Where policy changes are likely to drive additional costs into suppliers' operating models, this needs to be assessed within the constraints of a price-capped environment, along with a full regulatory impact assessment.

There is also a challenge that the Outcomes themselves should not change a lot, rather it is more around how they are implemented. Change is needed across the market for outcomes to work for suppliers, other industry participants and Ofgem (including Ofgem's approach to enforcement and compliance).

We have set out in Annex 2 below our suggested ways to consolidate the Outcomes.

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

Yes, we broadly agree with the explanations provided for the Consumer Outcomes. The detailed descriptions in the appendices are helpful in clarifying the intent behind each outcome.

However, it is important to ensure that any condensed or high-level versions of these outcomes do not dilute or remove the key intentions set out in the guidance. For example, Outcome 2 '*Consumers are not charged excessive prices for their energy, irrespective of their engagement*', does not make clear that customer engagement in switching is included, until the full detail in the appendix. This demonstrates that while summaries can be useful, the Outcomes risk omitting critical elements that define the scope and purpose of the outcome.

Similarly, Outcome 13 presents a challenge. The high-level objective, '*Consumers understand how to engage with and can make informed choices about the products and services offered by suppliers that support the net zero transition*', reads more like a customer aspiration rather than a clear articulation of the requirements or obligations placed on suppliers. This could lead to misinterpretation of responsibilities if stakeholders rely solely on the condensed version.

Overall, if understanding the requirements for a specific area necessitates reading multiple outcomes in detail, this raises the question of whether the framework is truly outcomes-based. An outcomes-based approach should allow stakeholders to grasp the intent and expectations without needing to cross-reference numerous detailed explanations.

6. 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 entirely agree that these outcomes are not materialising consistently for all consumer groups, despite being aligned with existing rules.

We set out in question two how the lived experiences and circumstances of consumers vary significantly. Ofgem's evidence suggests that consumers who are more widely affected by life's challenges, such as financial hardship, health issues, or social isolation, tend to view their relationship with energy very differently. For these groups, energy is not just a commodity, but a critical service intertwined with their overall well-being.

Differences in supplier practices and consumer engagement will also impact consistency of outcomes, as suppliers adopt different approaches to customer service and vulnerability, and consumers themselves vary in their willingness or ability to engage. Some cohorts may inherently feel dissatisfied when something goes wrong, regardless of whether the supplier acted reasonably. This creates a perception gap that compliance alone cannot bridge. Furthermore, energy markets are complex, and external factors such as wholesale price volatility, policy changes, and economic conditions influence fairness and resilience. These are beyond a supplier's direct control, meaning that a holistic strategy, rather than isolated interventions, is needed to shift customer perceptions and improve outcomes.

Ofgem has a part to play in helping support suppliers by sharing best practice guidance and fostering collaboration across the sector.

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

Yes, some outcomes are more important for consumers than others.

The most critical outcomes are those that have a direct and immediate impact on the customer experience. Consumer vulnerability should be prioritised and embedded across all outcomes. Vulnerable customers often need prescriptive safeguards because relying solely on market forces can leave them exposed. This makes protections for these groups a top-tier outcome.

Debt management is another critical area, especially following the cost of living and energy crises. Effective signposting and tailored debt plans are essential to help customers navigate financial difficulties.

For non-domestic customers, resilience and debt management are key priorities, alongside flexibility and innovation in product offerings to support business continuity and adaptability.

Equally important outcomes are providing a range of tariff options that suit customers' needs and the provision of accurate billing at a fair price, and offering accessible support, especially for those in debt or requiring extra assistance. Good customer service underpins all of these and is highly valued because it directly affects how customers interact with their supplier.

Other outcomes, such as resilience and innovation, are important but tend to be less visible to consumers day-to-day. Resilience can only become a concern when a supplier fails and costs are passed on, while innovation is more medium-term, aimed at improving value and service over time. Similarly, structural or industry-level outcomes, like energy transition initiatives matter, but they are indirect and should be managed holistically by regulators rather than forming the core of consumer-facing priorities.

In short, outcomes that impact customers directly ensuring reliable service, fair pricing, accurate billing, strong support, and effective debt management are the most important. Others, while necessary, play a supporting role and should not overshadow these essentials.

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, we think there is an opportunity for different outcomes than the Consumer Outcomes set out in this call for input to be applied to wider market participants.

As a principle, outcomes should apply to all market participants which interact with consumers, because outcomes matter to any customer interaction across the industry.

Wider market participants could include DCC, heat network operators, TPIs, load controller license holders, DNOs, network companies, meter operators, Xoserve, and gas distribution networks. These parties have varying degrees of consumer interaction, so the Outcomes would need to be tailored accordingly and reflected in their Business Plans (e.g. DCC and networks). For example, they could be shaped to work for entities like DCC, load controllers, and heat network operators. However, for others, such as the Retail Energy Code Company, it is difficult to see how they could be measured against the Outcomes in a meaningful way.

When considering if the Outcomes should be applied to the wider market there are some key considerations and concerns to highlight:

- Benchmarking and reputational risk: Applying Outcomes broadly could lead to benchmarks and league tables that undermine differentiation between participants.
- Interpretation challenges: Different participants may interpret Outcomes differently, leading to confusion and inconsistency.
- Governance and appeals: As we fed back in our recent response to the DESNZ review Strengthening Energy Ombudsman's Powers, an appeals process would be essential to manage disputes over interpretation of Outcomes.

Applying Outcomes to wider market participants aligns with the principle of accountability for consumer experience across the energy sector. However, implementation must be carefully managed to ensure clarity, fairness, and proportionality, with tailored approaches for different roles and robust governance to prevent misinterpretation.

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.

We would prefer a hybrid approach that combines outcomes with a reduced set of prescriptive rules (where there shouldn't be any flexibility in how suppliers deliver e.g., price cap). This approach appears to be the most balanced and pragmatic option and provides the necessary safeguards while allowing flexibility where appropriate.

A streamlined outcomes framework that replaces certain prescriptive rules where duplication exists, while maintaining essential prescriptive elements for high-risk areas is most likely to work for consumers, suppliers and industry. Clear guidance and intent statements for each outcome would remain critical to ensure consistent interpretation.

A fully outcomes-based framework could lead to varying degrees of interpretation by suppliers, resulting in inconsistency for consumers, so Ofgem would not achieve its policy intention.

Prescriptive elements, such as the price cap, support customer trust and confidence that prices remain fair in relation to underlying costs for customers on default tariffs. Additional outcomes-based requirements under the heading of 'fair prices' risk duplicating this framework, creating unnecessary complexity for customers and suppliers.

Layering outcomes on top of existing prescriptive rules would make the framework overly complex and burdensome. Instead, there is strong support for removing redundant regulation or replacing prescription with outcomes where duplication exists, rather than adding layers. This approach would help streamline requirements without compromising consumer protection. It is important to highlight the need for Outcomes to be flexible and adaptable to any future changes (e.g., AI, market evolution).

Timing is also critical. Current customer service improvements should be given time to bed in before introducing further regulatory changes. A sudden shift could undermine progress already made and create confusion for suppliers and customers alike. Additionally, stakeholders have emphasised the need for Ofgem to clearly articulate the intent behind each outcome to avoid broad interpretations that could later be challenged.

Any approach must ensure that oversight of consumer outcomes is fair and consistent across all suppliers. Reporting obligations should not duplicate existing requirements or evolve into a code of practice, as few customers would engage with such reports. The framework should reflect the intended outcome of the change rather than becoming an administrative exercise.

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?

A proportionate level of action to drive up customer service in the non-domestic sector should focus on embedding a culture change within Ofgem, moving towards an outcomes-focused approach rather than purely data interrogation. This means assessing how customer service manifests in real-world experiences rather than analysing metrics.

Ofgem's recent implementation of the Non-Domestic Market Monitoring (NDMM) RFI and its work to publish information needs to be considered. Any proposal to expand publication to include consumer outcomes should be integrated into this NDMM process and comply with Ofgem's data governance framework to ensure consistency and transparency.

When measuring outcomes through consumer satisfaction, Ofgem should adopt sector-specific benchmarks that reflect the differences between business and domestic customers. Business customers often interact with both TPIs and suppliers, so outcomes are influenced by both parties. This makes it essential to consider the link between consumer outcomes and forthcoming TPI regulation, as broker-related issues can significantly impact business customer experiences.

While the principle of focusing on outcomes applies to both sectors, the complexity of non-domestic relationships (e.g., TPIs, contractual arrangements) means interventions here should be more targeted and collaborative with industry stakeholders.

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?

No, we do not think that a voluntary approach could be effective. A voluntary commitment would create inconsistency across the market, as suppliers not signed up would be operating under different regulation, thereby creating more of a risk for consumers not receiving the same outcomes, regardless of which supplier they are with. We've seen this fail in practice with the TPI Code of Practice (COP), which demonstrates that voluntary commitments do not guarantee widespread adoption or meaningful change.

Consumers are unlikely to understand what a COP is, so it wouldn't deliver the transparency or confidence intended. For suppliers, introducing a voluntary layer without a clear structure would add complexity, especially when they are already navigating Consumer Outcomes measures of success.

Also, if Ofgem's current satisfaction surveys aren't supplier-specific, it's unclear how effectiveness could be measured industry-wide without full participation. This reinforces the need for direct regulation to ensure consistency, accountability, and measurable outcomes.

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.

A more outcomes-based regulatory framework could benefit the supply market by reducing unnecessary complexity and allowing suppliers greater flexibility. Instead of layering outcomes on top of existing prescriptive rules, which would only increase the regulatory burden, the focus should shift to removing constraints from the licences and codes and enabling market forces to operate.

If implemented correctly, this model could unlock innovation and growth. By assessing consumer outcomes rather than rigid KPIs, suppliers would have the freedom to innovate in how they meet consumer needs.

An outcomes-based regulatory framework, will mean that Ofgem also has to adapt its approach to regulation, looking at supplier outputs against the Outcomes, and not assessing compliance against a strict set of processes.

There are risks if the framework is poorly designed. If Ofgem continues to issue complex guidance or revert to prescriptive measures alongside this initiative, there will be no meaningful change. Regulatory certainty and long-term commitment are essential to attract investment and foster innovation.

Success depends on bold objectives that replace existing prescriptive obligations rather than add to them. Removing unnecessary constraints - such as over-regulated billing - would benefit consumers and allow market forces to thrive. However, Ofgem must resist the temptation to set KPIs as targets, as this could stifle creativity and lead to compliance-driven behaviour rather than genuine improvements.

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

Please see Appendix 1_Consumer Outcomes CFI_Questions 12 and 13 which lists combined answers for questions 12 and 13. Against each individual SLC we have provided an initial view on whether they must remain prescriptive or there is potential for less prescription depending on whether the SLC is met by the Outcomes.

Should Ofgem propose to amend existing licence conditions as part of its consumer outcomes programme it should consult stakeholders on proposed changes including a full Regulatory Impact Assessment. Given the vast scope of this exercise, we would encourage Ofgem to set out a thematic review process which will allow stakeholders to engage in the detail of any proposals whilst considering the wider context of the consumer outcomes work.

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

Overall, there is lack of guidance for suppliers, so any additional guidance from Ofgem would be helpful. This, along with historic guidance, should be provided in an easily accessible format, in sequential order of publications and themes.

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

Please see question 12.

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

When deciding whether rules should be prescriptive, principles-based, or outcomes-focused, the first factor is the need for standardisation and clarity. If the rule involves clear criteria and deliverables that must be provided directly to customers, e.g. GSOP, bill calculations, or redress, prescription is essential to ensure consistency and fairness.

Interpretation risk is another consideration. Where existing rules already allow varied interpretations, moving to outcomes could increase ambiguity and compliance risk. In such cases, prescription helps maintain certainty and enforceability.

Conversely, flexibility matters when the method does not affect key outcomes. For example, explaining a bill or offering support can follow different approaches if the desired outcome is achieved. Here, principles or outcomes work better to encourage innovation and customer-centric solutions.

Rules tied to financial stability or consumer detriment, e.g. vulnerability and debt, should remain prescriptive. These areas carry high risk and regulatory recourse, making proactive monitoring and strict compliance critical.

Where rules risk becoming outdated or require comparability across suppliers, prescription is preferable. However, Ofgem should aim to reduce unnecessary prescription and streamline regulation, using high-level metrics that it could set for itself to measure progress.

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.

The hybrid approach could be the most effective because it balances flexibility with necessary safeguards. However, Ofgem should explore complementary methods such as integrating outcomes into Standards of Conduct (SoC) and using reputational incentives through self-reporting. Any monitoring framework must avoid unnecessary duplication, reduce administrative burden, and provide clarity on expectations. Ultimately, the goal should be a proportionate, collaborative approach that protects consumers without imposing excessive costs on suppliers.

The hybrid approach offers flexibility and focuses on achieving meaningful outcomes for consumers, while ensuring that critical risks are managed through clear, enforceable standards. Evidence from regulatory practice suggests that purely prescriptive approaches can stifle innovation and lead to box-ticking, whereas outcomes-based regulation encourages suppliers to think about the consumer experience holistically. However, without some prescriptive elements, there is a risk of ambiguity and inconsistent interpretation, which could undermine consumer protection.

Alternative approaches could include:

- Incorporating Consumer Outcomes into SoC. This would be a relatively straightforward way for Ofgem to embed expectations without creating an entirely new reporting framework. However, Ofgem should be mindful that both domestic and non-domestic SoC have a clearly defined scope and would therefore not be suitable for all outcomes.
- Leveraging reputational incentives, such as encouraging suppliers to self-report on how they meet Consumer Outcomes. This could foster transparency and accountability without imposing overly burdensome obligations. However, any reputational mechanism should avoid duplicating existing comparison tools like Trustpilot or Citizens Advice rankings.

Concerns about reporting obligations must be addressed including concerns about the potential duplication of existing reporting and the likelihood that consumers will not engage with lengthy outcome reports. Producing an evidence-based annual report could become onerous, particularly given mixed messages from FCA-regulated sectors and the time-consuming nature of current market reports. Ofgem should consider using data already collected through existing mechanisms to minimise additional burdens.

Furthermore, Ofgem's statement that 'RFIs won't go away' appears inconsistent with government objectives to reduce regulatory red tape, and this tension should be resolved. This message was more recently

reinforced by Rachel Reeves, Chancellor of the Exchequer on 7 January 2026, where regulators were urged to 'go even further and act boldly' to remove barriers to business as a stagnant economy is the biggest risk to consumers and taxpayers. Ideally, RFIs should not remain a routine part of regulatory practice but only be initiated where Ofgem is conducting a time-limited project to assess performance against a particular outcome or requesting an individual licensee to demonstrate its performance. Ofgem's objective here should align to the Government's Growth Duty, aiming to reduce regulation, and any additional costs which are driven into suppliers' operating models as a result, should also be assessed within the constraints of a price-capped environment.

Lessons learned and clarity are critical. The Consumer Outcomes are currently too subjective and difficult to measure. Ofgem should provide clear expectations and share examples of good practice, similar to its Market Monitoring Report, to help suppliers understand what compliance looks like. This collaborative approach would shift the onus away from suppliers alone and build trust in the market, as compliance alone does not necessarily drive consumer confidence.

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

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

Improvements in customer experience and satisfaction could be measured by reviewing customer journeys and products to identify improvements. Using Net Promoter Score (NPS) and other customer insight MI, either directly or through suppliers, will help understand satisfaction levels. Repeating industry-wide surveys when needed will confirm whether customer service has improved.

Tracking growth and innovation is key. This includes monitoring supplier offerings, switching rates, competition in the market, and overall service levels. Higher satisfaction and increased choice could indicate progress. More customers adopting net zero products demonstrates success in supporting environmental goals and consumer transition to sustainable options.

A reduction in complaints, fewer complex issues, and shorter resolution times could also be indicators of better consumer outcomes. These trends show that customers are experiencing fewer problems and quicker resolutions. A decrease in GSOP payments could signal fewer service failures and improved reliability.

b) Reduced regulatory burden and encouraged growth and innovation.

Success could be measured by tracking both quantitative and qualitative indicators from supplier engagement and compliance trends. Fewer clarification requests from suppliers suggest clearer guidance and reduced complexity.

Positive feedback during direct discussions and a shift in conversations from compliance troubleshooting to innovation-focused dialogue demonstrates that suppliers feel less burdened and more empowered to grow. Together, these measures provide a balanced view of whether regulatory burden has been reduced and encourage innovation.

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?

We appreciate the opportunities to engage with Ofgem through its workshops, which have enabled useful discussion. However, combining these workshops with consumer groups and charities (CGCs) would strengthen collaboration by ensuring both parties understand each other's priorities and concerns, and work together to overcome challenges.

While workshops allowed dialogue, there was limited scope to influence or challenge the wording of proposed Outcomes. Once revisions were issued, Ofgem moved quickly to the Monitoring concept without further discussion and subsequently published the revised Outcomes in its CFI. Greater transparency and iterative engagement would improve this process.

We would also welcome Ofgem sharing more of its research and analysis underpinning the proposed Consumer Outcomes. Clearer communication on how suppliers perform well, alongside concerns about how

Standard Licence Conditions (SLCs) are interpreted individually or collectively, would help foster a more balanced narrative.

Accessing relevant documents remains difficult, with obsolete guidance still live and conflicting with newer advice. A streamlined, up-to-date repository would resolve this. Additionally, a more supportive, joined-up approach, rather than a regulator-versus-supplier dynamic would help achieve shared outcomes. Site visits have shown Ofgem's appreciation of operational complexities, and this understanding should inform policy development.

Finally, clarity on the net zero transition and how it flows through to retail policy is essential. A consistent, joined-up vision from DESNZ and Ofgem for 2030 would enable suppliers to deliver effectively for customers.

Annex 2 – Question 4

| Glossary of Terms | |
|-------------------|--|
| 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. |
| Outcome 2 | Consumers are not charged excessive prices for their energy, irrespective of their engagement. |
| Outcome 3 | Consumers pay prices which reflect the costs of an efficient well-run supplier business. |
| Outcome 4 | All customers can benefit from shopping around for the best deal if appropriate for them. |
| Outcome 5 | Customers can choose from a range of suppliers and contracts and are supported, by suppliers or third parties, to identify the best deal for them. |
| 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 dependent. |
| 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. |
| 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. |
| Outcome 9 | All products and services offered by suppliers should be fit for purpose, and where possible, inclusively designed. |
| Outcome 10 | Consumers receive appropriate and timely advice and information from their supplier that is relevant to them. |
| Outcome 11 | Consumers are aware of energy options available to and suitable for them at an appropriate time and are able to make informed choices that best meet their needs. |
| Outcome 12 | Customers should not be unnecessarily prevented from being able to switch supplier despite product or technology purchased or inherited. |
| Outcome 13 | Consumers understand how to engage with and can make informed choices about the products and services offered by suppliers that support the net zero transition. |
| Outcome 14 | Consumers understand how they are contributing to and benefitting from net zero products or services obtained via their supplier. |
| Outcome 15 | Consumers who choose to engage can and are supported by suppliers who remove barriers within their control. |
| Outcome 16 | Customers that engage with innovative products and services are protected from unexpected risk. |

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|------------|--|
| Outcome 17 | Consumers have confidence that despite how their energy is supplied and regardless of what parties are involved in supplying their energy, the service and technology will work effectively and efficiently. |
| Outcome 18 | Consumers are adequately protected from the costs of licensee failure. |
| Outcome 19 | Consumers can be confident that they are dealing with licensees that are financially resilient to external shocks. |
| Outcome 20 | Consumers' supply is maintained in the event of supplier failure. |
| Outcome 21 | Consumers benefit from fair prices, improved quality of services, and lower cost delivery of net zero as licensees attract sufficient investment. |
| Outcome 22 | Consumers benefit from licensees which are adequately resourced, demonstrating the right balance between resilience and innovation. |
| Outcome 23 | Consumers in vulnerable situations should have their needs identified, be able to easily notify and update their circumstances, and have good understanding of and access to support services designed to suit their circumstances and meet their needs. |
| Outcome 24 | Consumers in vulnerable situations should be provided with tailored communications that are easy to understand. They should be able to engage with their energy supplier with ease and not face exclusion based on their circumstances. |

Below we have noted our suggestions on which Outcomes could be consolidated, together with some additional points for Ofgem to consider.

- Either removing the Debt Outcome and combining it with 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 in, or at risk of debt or arrears, or are struggling to pay their bills should receive proactive, tailored, and consistent customer service that meets their needs, receive compassionate support and flexibility in payment methods and frequencies, and helps them sustainably pay towards their debt or arrears, especially consumers in vulnerable situations'

Or Removing part of Outcome 8 and moving it to Debt:

'Customers, especially those in vulnerable situations, in, or at risk of debt or arrears receive proactive, tailored, and consistent customer service. Those struggling to pay their bills receive compassionate support and flexibility in payment methods and frequencies that meet their needs and helps them sustainably pay towards their debt or arrears'

- Outcome 10 and 7 could be combined, removing 10 from Transparent and Enables Choice:

'Consumers receive appropriate and timely advice and information from their supplier that is relevant to them. 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'

10 and 7 could also include Outcome 11:

'Consumers are aware of energy options available to and suitable for them at an appropriate time and are able to make informed choices that best meet their needs. Consumers receive appropriate and timely advice and information from their supplier that is relevant to them. 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'

CIVS could also be incorporated into the above:

'Consumers receive appropriate and timely advice and information from their supplier that is relevant to them and is tailored to the needs of consumers in vulnerable situations. Consumers in vulnerable situations should have their needs identified, be able to easily notify and update their circumstances, and have good understanding of and access to support services designed to suit their circumstances and meet their needs. When consumers raise concerns, issues or complaints, be able to engage with their energy supplier with ease (and not face exclusion based on their circumstances) and suppliers investigate and address them fairly, effectively and promptly, via a channel and at a time that meets consumers' needs.'

This could also be further expanded to include Outcome 11:

'Consumers are aware of energy options available to and suitable for them at an appropriate time and are able to make informed choices that best meet their needs. Consumers receive appropriate and timely advice and information from their supplier that is relevant to them and is tailored to the needs of consumers in vulnerable situations. Consumers in vulnerable situations should have their needs identified, be able to easily notify and update their circumstances, and have good understanding of and access to support services designed to suit their circumstances and meet their needs. When consumers raise concerns, issues or complaints, be able to engage with their energy supplier with ease (and not face exclusion based on their circumstances) and suppliers investigate and address them fairly, effectively and promptly, via a channel and at a time that meets consumers' needs.'

Or an alternative is to simply combine the CIVS outcomes into one:

'Consumers in vulnerable situations should have their needs identified, be able to easily notify and update their circumstances, be provided with tailored communications that are easy to understand. They should be able to engage with their energy supplier with ease and not face exclusion based on their circumstances and have good understanding of and access to support services designed to suit their circumstances and meet their needs.'

- Another option is to combine outcomes 9,11,13 & 17

'Consumers understand how to engage with and are aware of energy options, products and services offered by suppliers, available to and suitable for them, including those that support the net zero transition, at an appropriate time and are able to make informed choices that best meet their needs. All products and services offered by suppliers should be fit for purpose, and where possible, inclusively designed. Consumers have confidence that despite how their energy is supplied and regardless of what parties are involved in supplying their energy, the service and technology will work effectively and efficiently'

- Outcomes 12,15 & 16 could combine into Low-cost transition:

'Consumers who choose to engage can and are supported by suppliers who remove barriers within their control and those who engage with innovative products and services are protected from unexpected risk. Customers should not be unnecessarily prevented from being able to switch supplier despite product or technology purchased or inherited.'

- Outcomes 18 & 20 could combine for Resilience:

'Consumers are adequately protected from the costs of licensee failure and their supply is maintained in the event of supplier failure.'