



TotalEnergies

TotalEnergies Gas & Power Ltd

Future Consumers Team
Ofgem
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Email: FutureConsumers@ofgem.gov.uk

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Dear Future Consumer 's Team,

Energy consumer outcomes

TotalEnergies Gas & Power is one of the leading energy suppliers to industrial, commercial, and business customers within the UK – TotalEnergies Gas & Power has been an established energy supplier since 1987.

Thank you for the opportunity to respond to this call for input. TotalEnergies supports Ofgem's Customer Outcomes initiative, provided it replaces existing licence conditions rather than adding new layers of regulation. It must also not have extensive guidance, greatly increase the REC's role or large reporting requirements as these will stifle any benefits. Guidance must clearly differentiate between domestic and non-domestic markets to avoid unnecessary cost or restriction to competition. While immediate changes may be limited, Customer Outcomes can gradually drive innovation as teams adapt to evolving customer needs and regulation. A move to Customer Outcomes would also require a culture change at Ofgem to align with them and reset DESNZ expectations.

Should you wish to any part of our response please contact andrew-e.jones@totalenergies.com.

Yours sincerely,

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

TotalEnergies welcomes the Customer Outcomes initiative and supports Ofgem's efforts to explore its introduction. We believe two key considerations are essential for its success against the objectives for growth, net zero and the customer interest:

Regulatory Burden

Customer Outcomes can be a positive advancement if they replace existing licence conditions. However, it is crucial that Ofgem avoids introducing extensive guidance documents or expanding the REC's role, as this could create a regulatory burden equal to or greater than the current framework. Simply layering new reputational incentives or guidance on top of existing obligations would increase costs for customers and hinder market innovation.

Clear Expectations for Market Segments

We are concerned that certain domestic regulatory expectations—particularly regarding debt and price—could be inappropriately applied to the non-domestic market, despite the significant differences between these segments. Guidance must clearly distinguish these differences. For outcomes that overlap with the DNO role, such as resolving supply disruptions, it is vital to define precisely where supplier obligations end. We welcome Ofgem's recent clarification that vulnerability-related outcomes are domestic only, as extending these to the non-domestic sector would add unnecessary cost and complexity, potentially leading to market exits or reduced contract offerings.

We ask that guidance explicitly states the differing expectations for domestic and non-domestic markets to prevent future misinterpretation.

A move to Customer Outcomes would also require a culture change at Ofgem to align with them and reset DESNZ expectations.

Our internal discussions suggest that Customer Outcomes could drive positive innovation for all parties, especially customers. While immediate changes may be limited, benefits are likely to emerge over time as operational teams review their practices against customer needs and the new outcomes. Given limited skilled and IT resources, these improvements will be gradual.

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

Customer satisfaction is highest amongst the largest non-domestic customers. We ascribe this to the lower level of regulation in this sector and the fact that this sector of the market has the highest level of competition.

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

Apart from metering we would agree. The metering obligations within the licence are extensive and could be dealt with more concisely with less customer regulatory burden whilst still bringing benefits to growth, net zero and the customer interest.

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

Any reduction that would lead to less regulatory burden customers have to pay for is welcome. We are not worried about the size of the current list Ofgem have produced, the risks we see are the size of the guidance documents, reporting requirements or increasing the size of the REC as part of the introduction.

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

As stated in the answer to question 1, we are concerned about how the introductions for the outcomes related to debt and price in the non-domestic market are introduced, and clear domestic / non-domestic expectations need to be set.

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

Different customers have different needs and drivers. This is particularly true in the non-domestic market. It would be virtually impossible to expect outcomes to be consistent given the differences.

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

It depends on what is important in the market at any point. For example if any of these scenarios were to happen; there are large volumes of market exits, system constraints leading to power cuts, spike in energy prices, a growth in demand side response these could mean certain outcomes becoming more important to others for periods of time.

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

We are only a licence supplier, and so not best placed to answer this question.

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

To meet the governments objectives of economic growth and reducing regulatory burden the only viable solution looks to be Customer Outcomes replacing existing licence conditions. Allowing the existing framework to continue and introduce Customer Outcomes in some other way will also reduce innovation opportunities across the market as well as confusion on which has priority if there were to be a conflict.

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

This is the worst possible outcome. It would feasibly double the regulatory burden in the market and cut any innovation opportunities that Customer Outcomes could produce to help customers and economic growth.

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

Initially suppliers could maintain there existing regulatory compliance approach. The opportunity for possible impacts comes when suppliers review their ways of working in any particular area. So innovation and growth may happen over time and not immediately.

One interesting internal conversation was the Licence Condition ownership approach would have to change. Today each sub-sentence of an SLC could have a separate internal owner, in Customer Outcome's this is less likely to be the case allowing more positive approaches to changing ways of working.

Q12. Are there specific licence conditions where less prescription could benefit the retail market without compromising consumer protection? a) For suppliers: are there any areas where you find guidance helpful or unhelpful?

Given we expect SLC0A will remain in place and we are a non-domestic supplier we do not see any areas where less prescription compromises consumer protection.

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

Where there is a safety and/or technical need to be precise then prescription is needed. For example, off supply or the definition of a SMETS2 meter.

There is currently a significant issue with guidance, open letters, best practice and similar documents supporting the prescriptive rules as there is no list of which ones are relevant or where to find many of them given the links to them on the internet can still work years later, meaning it can be uncertain if you find the current version. A clean slate will mean a simpler regulatory environment can be implemented, in a better structure.

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

Where there is a safety and/or technical need to be precise then prescription is needed. For example, off supply or the definition of a SMETS2 meter.

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

There is already extensive market monitoring of the non-domestic market following the non-domestic market review. We would expect all the information needed would be within that.

Q16. How do we best measure our success as to whether we have: a) Improved consumer outcomes and achieved our ambitions for customer service and b) Reduced regulatory burden and encouraged growth and innovation

The best way to measure success is not new ridiculous reporting requirements on suppliers which take resources, time and money, it will also impact regulatory burden, reduce growth and innovation opportunities.

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

Nothing in relation to this consultation.