



Utilita's response to the 'Consumer Outcomes' Call for Input

About Utilita

Utilita is the UK's leading smart prepayment specialist serving c.730,000 households and small businesses. Our digitally enabled services empower our customers to participate in the UK's Net-Zero journey while maximising their energy efficiency.

Smart pre-pay, or pay as you go (PAYG) energy, is part of the solution to ending fuel poverty. It gives customers control over their usage and spending, helping them avoid unexpected bills and reducing the risk of problem debt. It is also the cheapest regulated payment type, with Standard Credit costing almost £200 more per year. Contrary to misconceptions, the vast majority of customers choose smart PAYG because of its overwhelming benefits.

Utilita was founded to help households use less energy and make their energy spend go further. We are a trusted supplier offering innovative products and services to customers that were historically underserved. We are rated 'Excellent' on Trustpilot and consistently perform well in Ofgem's customer satisfaction survey.

Since the launch of our prepayment offer, we have never applied a standing charge when households use no or low amounts of energy. Our customers who don't use any energy – or use very little at all – don't pay anything. This is only fair and right, especially for prepay customers who would otherwise rack up costs while not using energy.

Utilita has also led the way in engaging low-income households on the path to Net Zero, guided by the mantra: The cheapest, greenest energy is the energy we don't use. Our app allows customers to monitor their energy 24/7 and gives households smart recommendations of simple, affordable ways to reduce energy usage. We're determined to help all types of households – no matter their income level – be part of and reap the benefits of the transition to net zero. We also have a high street presence so people can speak to us face to face. Our Energy Hubs are open to all for advice on affordability and energy efficiency, whether they're a Utilita customer or not.

Executive summary

1. We support a move to outcome-based regulation as this will support innovation and drive improved customer experience.
2. Outcomes should be implemented after a full review of existing licence conditions and guidance, many of which are outdated particularly in a smart, digital and prepayment market. Without removing outdated, duplicative or prescriptive rules, the Outcomes will create a second regulatory layer and be a barrier to innovation.
3. Moving prescription and detailed requirements out of the licence into guidance or other documents risks reintroducing prescription "through the back door". This will undermine innovation and will not deliver outcome-based results.
4. Consumer satisfaction differences are largely driven by affordability, not supplier performance. Financially vulnerable customers experience higher stress due to cost pressures. This systemic issue cannot be solved by supplier obligations alone.
5. For outcomes-based regulation to function effectively, prescriptive minimum standards should be set via GSOP

6. Outcomes must work for current market conditions while also being flexible enough to support innovation and the future development of the energy market.
7. Outcomes should apply to wider market participants specifically, TPIs and the DCC.
8. Outcome based regulation must be accompanied by collaborative engagement between suppliers and Ofgem.

This response sets out Utilita's view from our unique perspective as a smart prepayment specialist. We also endorse the response from Energy UK.

Responses to questions

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

Key Factors:

- Implementation of Outcomes needs to be included alongside a holistic review of license conditions and guidance to ensure there is no conflict
- Outcomes should not be prescriptive. We support GSOP as a means to ensure, a reasonable minimal level of service, with an Outcomes approach to enable innovation and competition to drive improved standards.

To move to an outcomes framework a review of the Supply Licence is required. Many of the license conditions are out dated and not fit for purpose, especially in a digitally enabled sector with smart meters at the core of the UK's Net Zero ambitions. The complexity of the Supply Licence and guidance is already preventing innovation and competition. It is essential that the proposed Outcomes do not exacerbate this.

We have included some examples where we consider the licence conditions to be outdated or overly prescriptive and would welcome the opportunity to discuss these further:

- SLC 7A - For rules on supplying Microbusiness customers, notably notification of terms, statement of renewal letters, extending and termination of contract terms and information on bills
- SLC 11B – Rules around Retail Energy Code
- SLC 12 – Matters relating to prepayment meters – many rules are now outdated with the new smart technologies
- SLC 12A – Theft rules may be better embedded in the industry codes
- SLC 14 and 14A – Customer transfers overlaps with the GSOP rules and would benefit with being made simpler or outcomes based. This may overlap with Outcome 12.
- SLC 22A has been used as a blocker to an innovative product offering that was put forward by Utilita to Ofgem's Sandbox in recent years.
- SLC 22C, 22D and 23 are incredibly prescriptive and should be reviewed prior to the introduction of outcomes. Specifically, SLC 23.6 requires urgent review by Ofgem as this cannot exist in the current Price Cap environment where changes are beyond a suppliers' control.
- SLC 27 has become very prescriptive and requires a move to outcomes.

- SLC 28 will cause conflict with SLC 27 if not reviewed together and moved into outcomes.
- SLC 31F, 31G, 31H, and 31I could all move into outcomes.

Adding outcomes as a separate layer outside of the supply licence would add unnecessary complexity and ambiguity regarding which rules take precedence in the event of conflict. It would also weaken the benefits of moving to an outcomes-based framework.

We would caution against introducing prescription through guidance or strict metrics. Outcomes should be assessed with a case law type system where it should be viewed by a “reasonable person” as whether an outcome was good or bad, with detriment being quantifiable and real. Compliance monitoring should consider whether a negative outcome was avoidable through good governance and how quickly issues were identified and remedied. Suppliers should be encouraged and recognised for effective remediation.

An Outcomes based framework will strengthen consumer protection by focusing on whether customers actually receive good outcomes rather than whether a supplier has met prescriptive procedural requirements. By setting clear expectations of what good service looks like, Outcomes ensure consumers are protected in a more meaningful and practical way than box ticking rules allow. The framework will allow Ofgem to assess whether harm was avoidable, whether suppliers responded promptly and effectively and whether the customer received a fair and reasonable resolution.

The framework needs to ensure economic growth and Net Zero are considered alongside consumer interests, ensuring that rules do not unintentionally stifle investment or innovation. For instance, allowing flexibility for new products or business models that can help with decarbonisation will be critical for achieving these duties. Importantly, suppliers should be able to facilitate innovation and trial new approaches without the need for direct Ofgem involvement, such as through a sandbox, which can be slow and cumbersome. Instead, there should be confidence for suppliers to innovate within the boundaries of existing consumer protections, with a mechanism to hold companies to account for any poor consumer outcomes. For example, encouraging trials of innovative tariffs or services under controlled conditions could advance Net Zero solutions without compromising consumer protection, if done with proper oversight.

The framework update should aim for a combination of clarity, simplicity, and flexibility, ensuring consumer protection is delivered in a way that allows suppliers to innovate. It should consciously embed the growth and Net Zero considerations by removing any outdated rules that hinder green innovation (e.g. SLC 22A) while core consumer outcomes are reinforced. By considering these factors, Ofgem can modernise the regulatory approach to be fit for the future energy market; dynamic, innovative and always serving consumers well.

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

Satisfaction rates differ largely because financially vulnerable consumers face affordability pressures that heighten stress and reduce tolerance for service issues, even when suppliers perform adequately. This divergence reflects broader socioeconomic challenges that suppliers alone cannot resolve. We observe this with the majority of customer contact primarily relating to affordability issues.



Financially vulnerable customers are also likely to require immediate attention; we are acutely aware of this need as the Smart Prepayment specialist and often campaign for improvements within the smart meter communication network. The reliance on and the performance of this technology varies by customer cohorts which will create varying perceptions of customer satisfaction.

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?

Yes. The proposed Outcomes are a good starting point and they cover the most central themes.

We provide further detail on our thoughts on the specific Outcomes in our response to Question 5.

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

We provide detail on our thoughts on the specific Outcomes in our response to Question 5.

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?

We have provided a detailed review of the Outcomes; however, we have a more generalised view of the accompanying explanations in Appendix 3. The explanations should be customer outcome focussed. Any reference to what a supplier should do, or what Ofgem expect a supplier to do is therefore not an Outcome. Explanations should be reviewed with this in mind.

We have outlined our detailed thoughts on the Outcomes and their explanations below.

Outcome 1 should be expanded to cover the general policy intent of the existing rules and SLCs 27 and 28 should be stripped back to avoid duplication

The last part of **Outcome 8** “Customers who are struggling to pay their bills should receive compassionate support and flexibility in payment methods and frequencies, especially consumers in vulnerable situations” is duplicated in part by **Outcome 1** and should be joined together under the debt banner in one or two Outcomes. Consistent language and descriptions should be used to simplify the regulations further (i.e. customers in, or at risk of debt or arrears, can be construed the same as customers who are struggling to pay their bills).

We provide an example of what this can look like below:

Outcome 1a – 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 1b – Customers in, or at risk of debt or arrears, should receive compassionate support and flexibility in payment methods and frequencies.

The explanatory text in **Outcome 1** states that “every customer’s situation is different”. This does not provide for a directive that suppliers could follow. To be effective, every sentence should include an outcome. For example, this could be rewritten to state “*tailored support is offered, during interactions, to account for a customer’s specific situation*”. The addition of “during interactions” appreciates that tailored messaging cannot be unique to every customer where automation is present on proactive contact with customers, but where ongoing interaction is made between the supplier, and the customer suppliers must ensure that tailored messaging is possible. This is a more realistic, and therefore more valuable, Outcome.

The description of “struggling to pay their bills” in the latter part of **Outcome 8** may refer only to billed customers which may be the policy intent but can be misunderstood to mean prepayment customers who are struggling to top up their meter. The meaning should be clear as to whether it applies to just billed customers or all paying customers.

If the Outcomes are the same for domestic and non-domestic then there is no need to specify within the explanations i.e. Outcome 1 states in the middle of the explanation that this is for domestic and non-domestic customers but its position within the wording makes it uncertain as to whether it only applies to the first half of the explanation or all of it.

Outcomes 2 and 3 should be removed or substantially reframed. They duplicate the role of price cap legislation and replicating it within the Outcomes adds confusion as to whether Ofgem intends to regulate market conduct or continue setting maximum retail prices. If Ofgem want an outcome-based framework, prescriptive price control language should be avoided, focusing on fairness and transparency instead, so the Outcomes can operate before and after any reform of price cap regulation.

A single “excessive price” reference point in **Outcome 2** is counter intuitive to apply to a market moving towards differentiated, service led offerings, for example, bundled flexibility, solar, batteries, heat pumps. Some customers will choose premium or value-added services and regulation should enable that choice rather than default to a single notion of “excessive”

The regulator should not be responsible for defining what is considered an “excessive price”. In order to get to Net Zero, new products will be critical, implying an “excessive price” will in effect rebrand the price cap. Ofgem should encourage suppliers, like Utilita, to specialise, innovate and offer varied products and services, not to incentivise suppliers to conform to an average notional supplier, This will drive real efficiency, competition and better consumer outcomes, based on fair and transparent pricing.

Outcome 3, framing outcomes around supplier efficiency and price levels is misleading for consumers. Ofgem cannot objectively define what constitutes an “efficient” supplier in a competitive retail market. Supplier operating costs are only a small proportion of the total bill. Most costs (wholesale, networks, policy) are outside of supplier’s control.

We recommend removing **Outcomes 2 and 3** in their current form and replacing them with a single Outcome, focused on fairness and transparency, which is compatible with a reformed price cap world and supports innovation.

An example could be:

"All customers will have access to a fair and transparent tariff, while suppliers retain the freedom to innovate, specialise and offer differentiated or premium services"

Outcome 5 can be distortive if applied literally. Customers should be able to choose from a range of suppliers and contracts, but the intent cannot be that suppliers should be obliged to run a range of contracts that may be expensive to deliver. For example, Utilita offer one variable tariff because we believe in open, simple pricing. This should be factored into the outcomes to allow for effective competition.

The mention of customer vulnerability within the Outcomes is inconsistent and the language to describe vulnerability is inconsistent between the Outcomes leading to potential confusion. In **Outcome 6** there is mention of customers who rely on energy for essential health and safety reasons, **Outcomes 8 and 9** mentions customers in vulnerable situations and **Outcomes 23 and 24** are specific to customers in vulnerable situations. Ofgem may consider whether there should be more consistency around the expectations on suppliers for this cohort of customers.

Outcome 7 is duplicated by the Complaints Handling Regulations and therefore should sit outside of the licence altogether.

The guidance in **Outcome 10** is a mixture of outcomes and expectations and should be revised to ensure that it is solely outcomes focussed. It could also benefit from being more generalised and from removing the statement *"whether it's about managing energy use, understanding bills, or accessing support"* as this is a prescription. Leaving it open will ensure everything is inclusive to the provision of timely, relevant advice. The descriptive *"in non-domestic market, the level of information... vary greatly"* is not required and the expectation in the last sentence should be removed. The Outcome to simply make relevant information available to all customers in a timely way for customers to make informed decisions should suffice given it encompasses all situations and scenarios. Further prescription or explanation is not needed in explanation.

Outcome 11 and 10 can be combined as they are very similar in intent. Alternatively, it can be broken into two parts. Part A being timely advice at key points during the customer journey and Part B being specific to the options available to customers when there is a natural end to a customer journey requiring an active choice by consumers.

The **Outcome 12** explanation is also similar in terms of expectation setting and will become outdated quickly. The wording is negatively set with an expectation that there are barriers that cannot be overcome (which may be true, but Outcomes should be positive). The Outcome should be that suppliers must do everything within their remit to enable customers to switch energy suppliers. It would be for Ofgem to then set out in any compliance or enforcement guidelines an allowance for suppliers to put forward any explanation of barriers that cannot be overcome and justify why Consumer Outcomes may not be reached in certain circumstances.

Outcome 13 also contains discrepancies between Customer Outcomes, unnecessary explanatory text and expectations that should be revised to offer clearer meaning on what outcomes should be achieved.

Outcome 17 is similar to **Outcome 6** in the expectation of “reliable services” and could be combined. It is arguable as to whether indeed, a separate set of outcomes should be written exclusively for customers who engage with products supporting net zero, or whether it should be applied to all customers many of the outcomes within the “Low-Cost Transition” section can be seen to be duplicated with the more general themes of earlier outcomes. They will also date quickly once the transition is well underway.

Outcome 19 We agree with the principle, but price control and regulatory frameworks play a significant role in our financial resilience. Ofgem needs to address this to ensure suppliers can have reasonable control over this outcome.

Outcomes 21 and 22 are arguably not customer focussed and should be within Ofgem’s gift to manage with suppliers outside of the licence.

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?

In recent years there has been significant licence change and many mandatory supplier-led support initiatives that have been successfully delivered quickly one after the other. This, combined with the strict financial price controls has made it incredibly challenging to deliver meaningful enhancements. In addition, Ofgem’s rigorous Market Compliance Review process in 2022 and 2023 and subsequent compliance activity in 2024 and 2025 has been an intense period of change overall for suppliers. The emphasis on prescription has driven the focus away from consumer outcomes and a shift away from activities that allow for genuine innovation in consumer service.

It is important to state that not all consumer groups require the same level of service to achieve good outcomes. Prepayment customers who pay for their energy upfront and who top up their meter more frequently in the winter periods require a different level of service than Direct Debit customers who pay for their energy in equal instalments over a 12-month period. Prepayment customers need quick response and immediate help when they need have an issue that needs resolving whereas a Direct Debit customer having an issue with a bill can reasonably wait for a response.

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

Ofgem found that fair pricing was a top priority for participants and strong resistance to passing on the cost of investment in Net Zero onto consumers. Therefore, current market focus is on pricing . The results of the consumer outcomes research shows that high energy bills, perceived lack of support around the price cap increase, winter fuel payments etc drive distrust with energy suppliers.

Customer service should be a top priority outcome with a strong focus on protecting vulnerable customers and for suppliers to act transparently and fairly. Prepayment customers should feel listened to and respected for their choice to retain a prepayment meter as it is an effective budgeting tool and relied on by many as a safe alternative to bills. They should be given customer support that is designed and tailored to maintain that lifestyle choice.

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 believe these outcomes should be applied to industry code managers and administrators, flexibility providers, aggregators, home management services and third-party intermediaries, including price comparison sites, as they are significantly involved in the selling element and start of the customer journey. As such, they should be accountable for their involvement.

Most importantly the DCC needs to be included in these outcomes, aligning incentives to provide good customer service.

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?

Our preferred approach is to transition to an outcomes-based framework through a phased, collaborative process. We do not believe retaining the current highly prescriptive framework is desirable. It has clearly shown its limitations (inflexibility, burden, and failure to prevent poor outcomes). At the same time, we recognise the need for careful implementation of an outcome-based regime.

For the non-domestic sector, especially microbusinesses, which often resemble domestic consumers in terms of capabilities and resources, we believe many of the same customer service outcomes should apply, but with some targeted interventions. In other words, the overall approach (setting clear outcomes for service quality, fairness, etc.) is equally valid for non-domestic, but the means of achieving them might differ to account for differences in how these customers engage.

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

No - A public commitment to deliver the Consumer Outcomes cannot work without formal regulatory change that repeals old legislation and rules. This risks a double jeopardy effect. This proposal can only work where Ofgem also make a public commitment to not enforce the licence and legislation where the Outcomes have replaced or duplicated them. It must also ensure that all suppliers make this commitment. Our response below assumes this scenario.

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.

Yes, a more outcomes-based framework will benefit the supply market. By moving away from micromanaging rules towards focusing on results, suppliers would have more freedom to innovate in how they meet customers' needs, potentially leading to new services, cost efficiencies, and overall growth in value for both consumers and companies.

Under the current prescriptive regime, all suppliers are nudged to operate very similarly. This reduces differentiation. For example, detailed rules often specify exactly how to word a bill or how to structure a tariff, leaving little room for a supplier to try a novel approach that might be more effective or user-friendly. In an outcomes-based world, the principle might simply be “customers should easily understand their bill,” and it’s up to the supplier to design the format. One might stick to the old template; another might create an interactive digital bill. If the outcome is met (perhaps measured by customer surveys or complaint rates about bills), then both are acceptable. This flexibility encourages suppliers to experiment with different solutions, which is essentially innovation.

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?

Yes, there are areas in the supply licence where rules could benefit from less prescription without hurting consumers and potentially improving outcomes. By removing these ridged requirements, suppliers could find more efficient or consumer-friendly ways to meet the intent. We have detailed some examples below:

Billing and information format (SLC 31H): Currently, the licence and Standards of Conduct include very detailed requirements for bills, annual statements, contract renewal notices, etc. For instance, the exact wording of certain messages, the positioning of information, and the frequency/timing of communications are tightly specified. While these were designed to ensure consumers get necessary information, they have made energy bills and letters quite complex and sometimes confusing. Easing the prescription here could let suppliers simplify communications. An outcome such as “customers receive clear, useful information about their tariff and consumption,” would allow suppliers to innovate perhaps by providing info via apps or interactive web dashboards for those who prefer that. As long as key facts (price, usage, etc.) are conveyed, protection wouldn’t be compromised. Consumers would be presented with information in a more digestible way (for example, a short summary bill vs. the current multi-page template).

Payment methods and debt (SLC 27): This condition currently mandates offering a range of payment methods and very specific rules around how cash/security deposits and payment schedules are handled. For example, it requires allowing payment at a Post Office or similar and sets strict rules on frequency for standard credit payments. Today, many customers are comfortable with digital payments, and new forms (like mobile app payments) exist. If suppliers had flexibility, they might streamline to methods that most customers use, potentially lowering costs (which helps pricing). As long as an outcome ensured “customers have accessible payment options that suit their needs,” suppliers could, for instance, encourage more efficient methods and only use legacy methods for those who truly need them.

SLC 27 prevents suppliers from developing Unique Selling Points in particular markets. Utilita is specialist smart prepayment supplier and want to focus on delivering an exceptional prepayment experience but are forced to offer credit payment which is not our core focus and is well served by other suppliers.

Similarly, on debt, rather than a tangle of rules about what letters to send when, Outcomes 1 and 23 would ensure that customers in debt are treated fairly and helped to manage repayment. This could open the door to more personalised approaches (like phone contact or arranging repayments via apps) instead of the one-size-fits-all schedule of warning letters mandated today. It would maintain consumer protection, likely improve it by focusing on actual engagement rather than ticking off letters.

Helpful guidance clarifies intent, offers interpretation, and shares best practices. Unhelpful guidance micromanages or introduces new requirements by the back door. We encourage Ofgem to use guidance to illuminate grey areas, especially during the transition to outcomes (where everyone might need examples of what “good” looks like). But we also caution that guidance should not be so proscriptive that it nullifies the flexibility that outcomes-based regulation is supposed to bring.

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

Yes, there will remain certain areas where detailed, prescriptive rules are necessary and appropriate to ensure critical consumer protections. We believe this is where GSOP fits into the regulatory framework for setting minimum levels of service. Prescriptive rules are most justified where uniformity of outcome is essential across all suppliers and where there’s minimal room or need for innovation in how to comply.

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

Ofgem should consider factors such as the severity of potential harm, measurability, the need for uniformity versus innovation, consumer engagement, alignment with industry codes and current enforcement guidelines.

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

We think the most effective approach would be a combination of quantitative and qualitative monitoring to track performance. A small set of KPIs per Outcome would provide measurable benchmarks and should look to utilise existing monitoring metrics such as Net Promoter Scores. Introducing customer satisfaction surveys by supplier, similar to the approach taken by Ofcom, would highlight if a supplier is leading or lagging in a particular outcome. As detailed in 4.42 existing volume-based complaints reporting could be adapted to include outcome-based metrics around the quality of the service received.

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

Success should be measured through a mix of quantitative and qualitative monitoring, using a small set of KPIs for each Outcome. These should draw on existing metrics such as Net Promoter Scores and be supported by customer satisfaction surveys.

KPIs should capture measurable outputs, high-quality data and indicators of behaviours that should be discouraged. Strong data would allow Ofgem to identify patterns across customer groups, highlight underperformance and target interventions effectively.

Success should also be assessed by whether the framework builds regulatory confidence, reduces unnecessary burdens and enables innovation and growth. Regular, evidence-based review of these measures would help ensure the approach remains proportionate, actionable and aligned with improved consumer outcomes and service quality.



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

We would welcome Ofgem arranging workshops and individual meetings where we can share our views pre-implementation. These should then continue once we move to Outcomes-based regulation so we can benefit from ongoing steers regarding our approach, fostering a collaborative relationship which will be critical to make this a success.

We would urge Ofgem to conduct and share the mapping exercise performed against the supply licence to generate the proposed outcomes as mentioned in the supplier workshops.

Recognising good practice alongside addressing problems would enhance collaborative engagement. Highlighting examples of innovation or strong performance, rather than only focusing on concerns or compliance, shows that positive efforts are valued. Maintaining a constructive approach will help Ofgem and suppliers work together effectively to deliver better outcomes for consumers.

For further information or to discuss this response in further detail, please contact Utilita Head of Regulation Faye Widdowson on fayewiddowson@utilita.co.uk.