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Future Retail Markets
Ofgem

By email to: FutureConsumers@Ofgem.gov.uk

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Call for Input: Consumer Outcomes

The Utilities Intermediaries Association (UIA) is a trade association representing UK third-party intermediaries (TPIs) in the business utilities sector. In addition, we provide a Broker ADR scheme for our members and their clients.

Our responses to your consultation questions are detailed below, We have answered only those that we feel best equipped to answer. Our responses are not confidential. If you do have any questions, then please let me know.

Yours sincerely

A handwritten signature in blue ink that reads 'R. Gladwin'.

Rachael Gladwin

For and on Behalf of The Utilities Intermediaries Association



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?

It is important to recognise that consumer satisfaction will always be lower where financial vulnerability exists. Expectations around consumer outcomes therefore need to be realistic and proportionate, recognising that wider socio-economic factors are often outside suppliers' control.

Any changes should avoid adding unnecessary regulatory burden on suppliers, particularly where this does not directly improve outcomes for consumers.

Ofgem should also take a more proactive role in monitoring supplier behaviour and market performance, with less reliance on self-reported information from suppliers.

Clearer and more accessible signposting on Ofgem's website about available support, consumer rights, and routes to redress would help improve outcomes without increasing regulatory burden, aligning with Outcome 8 and the issues raised in Question 6.

Consumer outcomes need to be clearly defined and transparent, so all parties understand what good looks like and how it will be assessed.

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

Differences in satisfaction rates are closely linked to affordability and financial vulnerability, particularly for consumers with disabilities or caring responsibilities. Stakeholder feedback suggests lower satisfaction among people in rented accommodation, likely reflecting unclear responsibility for supply, higher levels of debt, and limited control over energy arrangements. In short, this divergence reflects factors already set out in this paper.

In the non-domestic sector, sole traders and microbusinesses can share similar characteristics to domestic consumers and are therefore affected by many of the same pressures. Non-domestic customers have fewer protections, may be exposed to unfair contract terms, and do not have an automatic right to supply, meaning suppliers can refuse to contract with them. In addition, risk premiums applied to certain sectors, such as hospitality, can lead to poorer outcomes and may be perceived as discriminatory.

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



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

Yes. Of the 24 outcomes, we would prioritise 10, as the remainder largely duplicate similar themes and could be consolidated. For Outcome 1, we suggest that where genuine debt is evidenced, interest should be waived to help domestic and non-domestic consumers move out of the debt cycle, aligning with Outcome 8.

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 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 18: Consumers are adequately protected from the costs of licensee failure.

Outcome 20: Consumers' supply is maintained in the event of supplier failure.

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.

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?

Yes



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?

These outcomes are not delivered consistently due to a lack of effective regulatory monitoring and weaknesses in the complaints and redress process. Complaints can take too long to resolve at supplier level and often progress slowly once escalated to dispute resolution. Remedies do not always reflect the consumer's loss or fully address the underlying issue or are not enforced.

Further barriers include communication challenges and limited consumer awareness of their rights or where to seek redress, inconsistent in-house training across suppliers, and insufficient prior identification of specific consumer types, compounded by limitations within supplier systems that hinder effective recognition of and response to differing consumer needs.

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

Outcomes relating to debt, fair prices, quality and standards, and protections for consumers in vulnerable situations are more important than others, as they have the most immediate and direct impact on consumers' wellbeing.

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?

Yes, many of these outcomes could apply more broadly to all customer-facing participants in the energy retail market, including Third-Party Intermediaries (covering procurement, consultancy, and load management), Heat Networks (natural monopolies serving domestic and potentially vulnerable consumers), and Load Controllers. Extending these outcomes would promote consistency, fairness, and protection for all consumers, regardless of who provides their 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.

We support including the Consumer Outcomes in the Standards of Conduct guidance, alongside creating a reputational incentive by publishing data on whether suppliers meet these outcomes (collated by Ofgem). This would highlight good and poor performance, attract media attention, and raise consumer awareness, while encouraging suppliers to improve without adding extra prescriptive rules. A model similar to OFSTED ratings for schools could be applied, allowing consumers to quickly see how suppliers perform across key areas such as call waiting times, complaint handling, pricing, billing accuracy, service reliability, support for vulnerable consumers, and switching experience.



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 approach to improving customer service in the non-domestic sector would be to extend Guaranteed Standards of Performance (GSOPs) to cover the small business sector, in line with the recent consumer redress extension in the energy sector. The financial values of these standards should be higher for businesses to reflect the greater operational and financial impact of service failures.

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

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.

12. 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?

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

Yes, some prescriptive rules should remain to ensure key protections. As we represent business energy brokers, our response focuses on areas impacting brokers and their clients and is not exhaustive. From our perspective, these include: SLC0A (Treating Customers Fairly), SLC7 and 7A (Contract Terms and Supply to Microbusiness Customers), SLC13 (Site Access), SLC14 and 14A (Customer Transfer), SLC20 (Enquiry Service, Advice, and Dispute Resolution), SLC21B and 21BA (Billing and Backbilling), and SLC39 (Smart Metering).

These areas are critical because they cover fundamental aspects of the customer experience where errors, delays, or lack of transparency can directly harm business customers, including unfair contract terms, restricted access to supply, difficulties in switching, inaccurate billing, and limited dispute resolution options.

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

The key factor is the level of harm to the customer - higher-risk areas may need prescriptive rules, while lower-risk areas can be guided by principles or outcomes.

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.



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 could be measured by producing a supplier league table, similar to the Which? reports, that is colour-coded and highlights key areas such as call waiting times, complaint handling, billing accuracy, and customer support. Targets should be set, and performance tracked for the number of issues raised, resolved successfully, and resolved within agreed timeframes.

Collating this data and publishing it in a clear league table would demonstrate that suppliers are being held accountable, provide transparency to consumers, and show tangible outcomes. This approach would also incentivise suppliers to improve, encourage competition, and stimulate better products and services, while simultaneously addressing the perception that Ofgem is not visible or effective.

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?

From our perspective, we welcome Ofgem's efforts to engage with the TPI community and the fact that dedicated points of contact have been provided for organisations such as ours.

Better signposting on Ofgem's website would be very helpful. All materials - consultations, blogs, press releases, guidance, etc. should clearly indicate whether they apply to domestic or non-domestic markets, so users can quickly identify relevance.

In addition to providing a list of all gas and electricity licensees, we would like to see a register for resellers, white labellers and their source suppliers, licence-lite suppliers, and their partner organisations. This would not only help stakeholders check market participants but also create transparency in an area that is currently very opaque. The same approach could be extended to incorporate new and emerging business models, demonstrating that Ofgem is in step with the market.

