



Reviewing the Supplier Guaranteed Standards of Performance (GSOP) - Call for input

Deadline: 22nd January 2026

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The Centre for Sustainable Energy (CSE) is a charity supporting people and organisations across the UK to tackle the climate emergency and end the suffering caused by cold homes. We do this by sharing our knowledge, practical experience and policy recommendations.

For over 40 years, we have supported people to take effective action on energy in their homes. Our research and analysis focus on making the energy system greener, smarter, and fairer. Through our advice line, home visits and one to one support, we support around 15,000 people a year to reduce their bills and make their homes more energy efficient.

We deliver fuel poverty services for two of the electricity network operators and six local authorities. Through these services we support thousands of people on low incomes who often have multiple vulnerabilities. Our response draws directly on our considerable experience of supporting vulnerable consumers in managing their energy bills and in resolving problems they have with their energy suppliers.

We support and have contributed to the response being submitted separately by the End Fuel Poverty Coalition.

Q1. Do you have any views on how the GSOP should be used to deliver good consumer outcomes as part of our wider regulatory toolbox?

If Ofgem is considering adopting less prescriptive outcome-based rules for energy suppliers (with less certainty) we would welcome the creation of wider guaranteed standards of performance which would capture the key components of minimum acceptable service.

From our perspective as an advice organisation, we see systematic and recurring problems with inaccurate and infrequent billing, long-running errors, inconsistent treatment when consumers fall into debt, poor recognition of vulnerability, barriers to third-party advocacy, and serious difficulties contacting suppliers or resolving complaints.

We see real potential in reforming and expanding the Guaranteed Standards of Performance as part of Ofgem's regulatory toolkit. GSOPs provide a credible way to embed the fundamentals of acceptable service across the market: accurate and timely billing, prompt correction of errors, regular meter reads for vulnerable customers, timely delivery of Ombudsman remedies, proper recording of nominated advocates, and compliance with protections on back-billing and involuntary prepayment meter installation.

Stronger GSOPs, backed by automatic financial payments each time a failure is recorded, could systematise these basics and create clear operational incentives for improvement. An automatic payment every time a breach occurs, appropriately maintained over time and capable of repeating where failures persist, would send a much stronger signal to suppliers than the current framework.

Q2. Do you have any comments on our proposed objectives for the GSOP mechanism?

We welcome and support the proposed objectives set out. We would suggest that GSOP reporting should be made available to the public to strengthen the reputational incentive for service improvement.

Q3. Do you have any comments on our proposed criteria for the design of any new Guaranteed Standards, or how we intend to use the criteria?

We support the proposed criteria, which provide a good basis for determining what can be regulated through GSOP. GSOPs should be set to allow binary yes / no answers, enabling automated reporting and penalty issuance, with little direct human involvement.

Q4. How effective is the current GSOP framework and individual standards in delivering good consumer outcomes? Please provide evidence where possible.

Through our advice line, home visits and one to one support, we support around 15,000 people a year to reduce their bills and advocate on behalf of vulnerable consumers with their electricity suppliers.

From our experience of representing vulnerable customers struggling with poor customer service, the existing Guaranteed Standards of Performance are limited in scope and do not cover the issues that give rise to the majority of issues customers come to us for. They are also not well known about by consumers.

Whilst we welcomed the GSOP recently consulted on in respect of Smart Meters, and think that approach will be effective, we do not think the pre-existing GSOPs are particularly effective in driving up standards. The lack of any downward trend in GSOP breaches suggests that the way the penalty is set is having only a limited effect on service provision.

Scope

Q5. Do you have any views on what would determine if a GSOP or a licence condition is the best tool to improve supplier performance?

We share the view set out in the consultation that performance standards which can be objectively measured, automated and have only yes / no answers, are best suited to being developed as GSOPs.

Once GSOPs are formulated, their enforcement will be automatic and require no additional input from Ofgem. Our view is that core minimum expectations of service, for example resolving complaints, frequent billing, promptly investigating and correcting inaccurate billing would be well suited to being formulated as GSOPs.

Whilst individual occasions of poor service in any one area would be unlikely to trigger enforcement action by Ofgem through license conditions, such service failures can give rise to significant hardship or distress for customers, and there should be means of redress.

Q6. Are there any supplier service areas where it would be appropriate for us to explore new GSOPs, or move an existing licence condition into the GSOP framework?

We would welcome defined GSOPs for the following areas:

- Timely and regular billing – at a minimum, consumers should be billed quarterly
- Accurate billing – inaccuracies in billing should be remedied promptly, within 8 weeks, and inaccuracies should not be allowed to persist for more than one billing cycle
- Regular quarterly meter reading for vulnerable customers on PSR who have indicated they need this support.
- Closing unresolved complaints without consent.
- Timely resolution of upheld complaints and implementation of ombudsman remedies – within 1 month.
- Incorrect or absent recording of nominated consumer advocate
- Back-billing beyond 12 months

- PPA installation – that suppliers comply with involuntary installation rules
- Availability of translation services
- Supplier contacted household to offer support within one week of self-disconnection.
- Attempted disconnection in winter of protected households against Electricity Supply Standard Licence Conditions

Q7. Should any of the current GSOPs be removed, or replaced with a licence condition to better achieve its policy aim?

No. The existing GSOPs still appear relevant and set out requirements with more precision than the license conditions.

Q8. Should we consider expanding the GSOP mechanism to cover non-domestic customers, or a sub-section of non-domestic customers? If so, which existing or potential future standards would be most appropriate?

Q9. Do you have any views on what the underlying rationale for the payment level and mechanism should be to best achieve the GSOP objectives?

The statistics included within the call for evidence suggest that the GSOP penalties are having only a modest impact in terms of guaranteeing minimum service standards and therefore we welcome reform to make them more effective.

We agree with the underlying rationale for the payment and agree that the payment should not be designed to offer compensation reflecting the financial loss or hardship suffered as a result of individual breaches. It could however be varied according to the degree of harm likely to arise from different categories of service failure.

Q10. Do you have any views on specific changes to the payment mechanism we should consider, including the examples included in this paper?

From the options suggested we would support the following:

Variable penalty based on potential harm

Some breaches, for example failure to regularly bill customers or sustained mis-billing which is not rectified can give rise to significant levels of distress and hardship for

customers, having a detrimental effect on their overall quality of life. In a recent case, a client was paying too little because of a billing error and it wasn't resolved for over a year, resulting in an energy debt of around £1000 debt.

Repeat payments for ongoing breaches

Through our advice work we see regular cases where consumers see sustained and repeated service failures (for example mis-billing) which are not resolved. We would like to see repeated penalties so that the financial impact on suppliers racks up with sustained poor performance.

Inflation-linked automatic changes

Whilst the penalties went up from £30 to £40 this year (a 30% increase), they had been at this level since 2015, during which time energy bills have gone up approximately 80% and there is no mechanism to ensure the penalties keep track with inflation. We suggest that penalties are index linked.

We recognise that there is a balance to be struck between increasing penalties to improve minimum service levels and keeping costs down. We consider that with these changes, it should not be necessary to increase the base level of payment from £40.

Q11. Are there any issues we should consider with introducing repeat payments for ongoing breaches?

Q12. Are there any issues we should consider with introducing variable payment levels for different consumer groups or severity?

Q13. Are there any specific changes to the current set of exemptions that we should consider?

We agree and support the majority of exemptions laid out. However, we would point out that sometimes vulnerable customers, for example those with mental health conditions, poor health or substance abuse problems may find it difficult to manage their energy accounts. There is a balance to be struck between ensuring suppliers are not penalised for service failures which are not their fault and giving vulnerable customers extra support so they may receive a good service.

Q14. Are there any specific changes to the target levels of existing standards that we should consider?

Existing

- Making / Keeping appointments within 4-hour slot

- Faulty credit meters – fix within 5 days
- Faulty PPM – commence fix within half a day
- Reconnection within 24 hrs or 12 hours for PSR customers with medical needs
- Metering
- Switching within 5 days
- Final bill within 6 weeks of switching
- Refunding final credit balance within 10 days of final bill
- GSP payments within ten working days
- supplier to provide a final bill within 6 months of the supplier no longer supplying a consumer

Q15. Are there any improvements we can make to the way we collect data from suppliers specifically on their compliance with the GSOP?

We would welcome Ofgem regularly publishing supplier performance against GSOP and GSOP payments made by supplier, to strengthen the reputational incentive for ensuring good customer service. There would be potential to incorporate this data within Citizens Advice scoreboard.

Q16. Are there any additional risks that we should consider when exploring our approach to monitoring and ensuring supplier compliance with the GSOP?

We agree with the risks outlined.

In our view, GSOP should be minimum standards which should be met by all energy suppliers for all customers. Therefore, it is not appropriate for customers to have to enforce these standards or claim the penalty manually.

We have experience of suppliers presenting penalties to customers as generous optional payments rather than mandatory penalty payment for failing minimum standards.

We suggest that Ofgem explore whether it would be possible to require suppliers to automate GSOP recording and penalties. We also suggest setting out a transition period during which suppliers could adapt their operating practices to meet this requirement and report on their approach. It is unlikely that suppliers will automate GSOP penalties without being mandated to do so.

Q17. Is there a need for any supporting guidance, either aimed at suppliers or consumers, to improve the effectiveness of the GSOP?

Yes.

Q18. Is it important that consumers are aware of GSOPs? Why?

We would welcome further awareness raising for consumers explaining their rights but would stress that GSOP should be mandatory minimum standards enforced by Ofgem and applied by suppliers as baseline business practices. It should not be down to customers to claim their rights under GSOP.

Q19. Are there any actions that Ofgem or suppliers should take to improve consumer awareness of the Guaranteed Standards?

We would welcome measures to improve consumer awareness and would suggest that a summary of the guaranteed standards is included on all electricity bills, with a link to further details. We would however reassert that it should not be for customers to have to assert or claim their minimum rights.