

Steve Kirkwood  
Ofgem Retail Policy Team  
  
Ofgem  
10 South Colonnade  
London  
E14 4PU

**SSE Energy Solutions**  
1 Forbury Place  
43 Forbury Road  
Reading  
RG1 3JH

[christie.thomson@sse.com](mailto:christie.thomson@sse.com)

Sent by email to: [FutureConsumers@ofgem.gov.uk](mailto:FutureConsumers@ofgem.gov.uk)

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**Dear Steve,**

**Re: Reviewing the Guaranteed Standards of Performance Call for Input**

We welcome the opportunity to respond to the above Call for Input. This response represents the views of SSE Energy Solutions, the non-domestic energy supplier operating under the supply licence SSE Energy Supply Limited.

As a non-domestic only supplier with no domestic customer base, we have tailored this response to reflect the fact that most of the current GSoPs are domestic-based. Nonetheless we do have some key points as follows:

- There is a risk that amending the current GSoP regime will result in higher costs for suppliers which will ultimately be passed through to non-domestic customers. Suppliers will need to dedicate resource and make system and operational process changes to align with any regulatory change. Ofgem must evidence that the cost of such work is proportionate to any customer benefit.
- We do not consider that it is the right time to make any fundamental changes to the GSoP arrangements. Increasing demand on suppliers will introduce additional operational and regulatory complexity at a time when the non-domestic market is already navigating substantial change (e.g. MHHS). Furthermore, we note that Ofgem has very recently committed to introducing a new set of GSoPs for Smart Metering requiring significant input from suppliers. To conduct a broader review now will lead to further burden.
- There is no evidence of systemic failure in non-domestic service levels that would justify a full overhaul of GSoP requirements. We consider that the existing framework is already clear, well-defined and sets consistent minimum standards for suppliers.
- The GSoP framework should not be used as a proxy for wider reform regarding quality of service or outcomes-based regulation.

With regard to Ofgem's specific focus areas as part of this Call for Input, we have set out our views below from a non-domestic supplier perspective.

**Role**

GSoPs are a valuable regulatory tool where they are able to address specific failures in service which are measurable and unambiguous. They should not be seen as a lynchpin which determines service quality but be used as a complementary intervention where needed.

We would strongly oppose any proposals which broaden the role of the GSoPs as we consider this would lead to duplication with existing obligations and would undermine the competitive nature of the non-domestic market. We do not currently see any need to review the role of GSoPs and consider they are operating as an effective backstop. We would expect to see robust justification and rationale from Ofgem for altering the role of GSoPs in non-domestic should this progress.

## **Scope**

SSE Energy Solutions does not support any extension of the current GSoP scope to cover additional non-domestic activities. We are particularly concerned about crossover in non-domestic of GSoPs which are appropriate only for domestic customers. Non-domestic customers are highly diverse in nature and any uniform application of GSoPs across domestic and non-domestic risks additional cost for no benefit (in fact, it may lead to non-domestic consumer harm if the proposals are not tailored to fit non-domestic consumer needs).

We also consider that some aspects will be better addressed through existing licence conditions or through contractual arrangements rather than through the GSoP regime. Should Ofgem wish to explore further non-domestic GSoPs, extensive supplier engagement would be needed alongside clear evidence that existing arrangements are ineffective. Our view is that any current expansion of scope in non-domestic would be disproportionate.

## **Design**

We are satisfied that the current design of GSoPs in non-domestic works well as it provides a clear and unambiguous set of rules for suppliers to follow and limits subjectivity. As noted in our response to Ofgem's Consumer Outcomes Call for Input, we do not support any design which moves towards outcomes-based standards or introduces subjective concepts which are difficult to evidence and leave room for varied interpretations.

Non-domestic customers and suppliers alike value certainty, stability and reliability both from a commercial and regulatory perspective. The current GSoP framework is time-bound and measurable so gives confidence to consumers that compensation is decided upon in a fair and clear way. Regarding payment amounts, we also consider that the current £40 compensation level is proportionate and does not need further review at this time (noting this was recently reviewed early in 2025 to bring in line with inflation changes).

## **Operation**

From a supplier operational perspective, GSoPs already require significant resource and administration (e.g. monitoring and reporting, regular training, system specifications etc.). Any changes to the current arrangements must be justified as they will be passed through to non-domestic customers. As previously

mentioned, the non-domestic market is already subject to significant change and any additional operational burden is not reasonable at this time.

Furthermore, as GSoPs require legislative change, this process can be lengthy and complex. This again will add cost and burden therefore it is important that any changes proposed are strictly necessary, proportionate and future-proof.

In conclusion, as the GSoP framework already provides a clear and targeted backstop in non-domestic, large-scale reform is not necessary and would lead to cost pressures and preventable complexity. Retaining the current approach will preserve competition and flexibility which will best protect non-domestic customers' interests.

We would be happy to discuss our response further with Ofgem if helpful.

Yours sincerely,

**Christie Thomson**

Regulation Manager – SSE Energy Solutions