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**Call for Input: Reviewing the Supplier Guaranteed Standards of Performance (GSOP)**

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 'Rachael Gladwin'.

**Rachael Gladwin**

For and on Behalf of The Utilities Intermediaries Association



## Role

### **Question 1. Do you have any views on how the GSOP should be used to deliver good consumer outcomes as part of our wider regulatory toolbox?**

Be used for clear, measurable outcomes

Best suited to issues that are clear-cut and need little or no subjective judgement.

Concerned that extending the GSOP regime too far could raise costs for suppliers, which would be passed on to consumers, and may discourage new entrants.

Question the value of extending the regime, as GSOP performance statistics have stayed largely unchanged over the past three years.

### **Question 2. Do you have any comments on our proposed objectives for the GSOP mechanism?**

They make sense and seem reasonable.

### **Question 3. 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?**

Look reasonable.

### **Question 4. How effective is the current GSOP framework and individual standards in delivering good consumer outcomes? Please provide evidence where possible.**

As referenced in points 1.16 and 1.17 of your consultation, it is difficult to assess the effectiveness of the GSOP framework because outcomes are essentially unproven - trying to prove a negative. Current statistics suggest little noticeable improvement over the past three years. Is this because the GSOPs are ineffective, or would the situation be considerably worse without them? Closer scrutiny is needed to understand why performance has remained largely static

## Scope

### **Question 5. Do you have any views on what would determine if a GSOP or a licence condition is the best tool to improve supplier performance?**

Licence conditions set out the principles under which suppliers must operate, providing the broader framework for their conduct. GSOPs directly address specific failings in measurable actions, with the individual consumer being directly compensated. I would use this distinction to decide whether a licence condition or a GSOP is the most appropriate tool to improve supplier performance.

### **Question 6. 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?**



It may be appropriate to consider new GSOPs for complaint handling timescales and the implementation of remedies (the latter subject to DESNZ's decision). Billing issues, such as read frequency, could also be considered. However, we would be cautious about adding too many areas, given the potential impact on suppliers, the additional metrics Ofgem would need to collect, and the resulting costs that would ultimately be passed on to all consumers.

**Question 7. Should any of the current GSOPs be removed, or replaced with a licence condition to better achieve its policy aim?**

No

**Question 8. 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?**

Extend to small businesses to correlate with DESNZ decision to extend consumer protections to this section for consistency within the consumer protection sphere

**Design**

**Question 9. 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 payment level should be inflation-linked and set as a flat rate across all GSOPs. Suppliers' own complaint processes, alongside the Energy Ombudsman Scheme are the most appropriate avenues for customers to recover actual losses. GSOPs should also apply to repeated failures.

**Question 10. Do you have any views on specific changes to the payment mechanism we should consider, including the examples included in this paper?**

Keep it simple

**Question 11. Are there any issues we should consider with introducing repeat payments for ongoing breaches?**

No. Payments should be applied for repeat breaches. It is the supplier's responsibility to address the underlying cause, and if a third party is responsible, the supplier should seek redress from them. The customer should not be negatively affected

**Question 12. Are there any issues we should consider with introducing variable payment levels for different consumer groups or severity?**

No. Introducing variable payment levels would be complex and subjective. GSOPs should remain a flat fee paid to the consumer to acknowledge that standards have not been met. If a customer is seeking compensation for actual damages or losses, they should use the supplier's complaint process or the Energy Ombudsman Scheme.



**Question 13. Are there any specific changes to the current set of exemptions that we should consider?**

We believe the current exemptions are already comprehensive, covering severe weather, access denied, customer actions, safety risks, and third-party damage.

**Question 14. Are there any specific changes to the target levels of existing standards that we should consider?**

**Operation**

**Question 15. Are there any improvements we can make to the way we collect data from suppliers specifically on their compliance with the GSOP?**

The main area for improvement may be to reduce duplication in the data being requested or reported, for example where similar information is already captured under the Retail Energy Code.

**Question 16. Are there any additional risks that we should consider when exploring our approach to monitoring and ensuring supplier compliance with the GSOP?**

One risk is that increasing monitoring could add to the regulatory burden on suppliers, which runs counter to the stated aim of trying to streamline processes wherever possible.

**Question 17. Is there a need for any supporting guidance, either aimed at suppliers or consumers, to improve the effectiveness of the GSOP?**

For suppliers, guidance on what is or isn't an exemption, and reporting requirements (should they not have an automatic process for reporting GSOPs)

**Question 18. Is it important that consumers are aware of GSOPs? Why?**

Awareness of GSOPs sets clear expectations for the minimum service consumers should receive and reassures them that poor standards will be addressed. It also makes it more likely they will report non-compliance—especially where supplier systems aren't automated and issues might otherwise go unrecorded or escape Ofgem's monitoring.

**Question 19. Are there any actions that Ofgem or suppliers should take to improve consumer awareness of the Guaranteed Standards?**

I would say no because GSOPs are already easy to find through supplier websites, customer emails and letters, and well-known sector sites like Ofgem and the Energy Ombudsman. Ongoing campaigns, such as for smart meter rollout, also help keep them visible.

