
Appendix B: Supplementary Qualitative Data and Analysis

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Appendix B: Supplementary Qualitative Data and Analysis

A1.1 This Appendix sets out our methodology for qualitative data collection and includes supplementary information to the key findings and qualitative evidence drawn out within the report.

Methodology

A1.2 As set out in Appendix A, the review incorporated several data-gathering exercises, including the CFI¹ which contained disconnection questions on volumes, cost and regional variation.

A1.3 The sector workshop series, conducted between November 2025 and April 2026, was a critical part of finalising the information-gathering stage of the review. We engaged with a wide range of stakeholders including industry representatives (Transporters, Suppliers, data system representatives and UIPs), as well as those representing other interests, including government (DESNZ, DWP, HSE) and consumers (Citizens Advice Bureau, Citizen's Advice Scotland, and think-tank Sustainability First). These workshops looked to contextualise our quantitative findings and craft a series of options that could address or mitigate against current and emergent challenges resulting from the current framework design.

Further information on our workshop series

A1.4 The workshops centred on five focus areas derived from responses to our Call for Input: regulation, service design, access, quality and costs (and prices).

¹ [Exercising consumer choice: a review of the gas disconnections framework](#), published 13 January 2025.

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Area of Focus 1: Regulation

Summary of Issues

- A1.5 The first area of focus centred on what (if any) foundational principles should guide regulation of gas disconnections, noting those same principles would ultimately shape overall disconnection service design and delivery.
- A1.6 The current gas regulatory framework was not designed with gas disconnections in mind and accordingly, the framework does not feature adapted principles or regulatory requirements designed to foster robust Gas Disconnection service delivery across the energy transition. The ongoing reliance of Ofgem and industry on Condition 4B Connection Charging Objectives² to guide Gas Disconnection charging and service delivery, makes obligations on Gas Transporters unclear, and makes monitoring and enforcement by regulators challenging. This impacts energy consumers as consumer protection principles are either not applied or enforced through current disconnection regulation.
- A1.7 We derived eight new principles which could form the basis for a new disconnections regulatory framework to address this. All principles were derived from the existing powers and duties of Ofgem and the HSE to permit development of a bespoke framework while avoiding the need for legislative change. We note that many significant issues raised through the CFI and workshops, could be addressed either fully, or to a significant extent via these principles.

Table 1: Proposed disconnections principles

THEME	PRINCIPLES	DESCRIPTION OF PRINCIPLES
Compliance	Compliance with Act/Licence	The framework must ensure that licensees remain compliant under the Act and licence in undertaking disconnections.

² The connection charging objectives are found in the [Gas Transporters Licence: Standard Conditions](#) under 4B - Connection Charging Methodology, and relates to principles and conditions that the licensee must follow in relation to pipes supplied or laid by the licensee, and gives rise to charging conditions.

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Resilience and Net Zero	Net Zero planning	The framework must ensure disconnection service delivery is in alignment with Government's net zero objectives and/or targets.
Resilience and Net Zero	System planning	The framework must ensure system planning supports delivery of efficiency measures to deliver disconnections at pace whilst ensuring continued gas security for consumers.
Growth Duty and Innovation	Facilitating competition	The framework must ensure that licensees do not discriminate between service providers and where reasonable, must promote appropriate competition between service providers to ensure fair prices.
Growth Duty and Innovation	Business planning	The framework must ensure business needs and developments are considered in service delivery and ensure that licensees plan to amend operations (across portfolios) in the lead up to net zero delivery.
Consumer Interest, Quality and Safety	Cost reflective and lowest cost	The framework must reflect the delivery of a service at lowest reasonable cost.
Consumer Interest, Quality and Safety	Consumer protections	The framework must ensure needs of consumers are considered to ensure commitments around charging and system planning reflect varying needs of vulnerable customers.
Consumer Interest, Quality and Safety	Equity	The framework must not unduly discriminate between consumers when undertaking disconnection service delivery and planning.

Outcomes of Sector Engagement

A1.8 There was a clear preference across the sector to adopt a ‘blue-sky thinking’ approach; dispensing with existing principles and regulations (including those contained within the Gas Act 1986) and designing principles and regulations anew. There was no clear consensus across the sector as to what that framework would look like or what principles should guide its development, however, it was clear that any such approach would require legislative change to introduce new objectives,

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duties, and powers not covered by existing regulation or to disapply existing objectives and duties.

A1.9 While we acknowledge the appeal of such an approach, we note that legislative change is a matter for Government and would therefore take time and further consultation to accomplish. In this context, sector participants broadly agreed that regulation based on a set of modified disconnection principles could present a workable interim solution and would be both crucial and valuable to setting the foundation of any future disconnections framework.

Ofgem's View

A1.10 The first step to creating both an interim and enduring regulatory framework is agreeing the core principles on which that framework should be based. The creation of a bespoke disconnections regulatory framework via legislative reform represents a strong long-term solution to address known issues with the regulation of Gas Disconnections. This option may be necessary to enable future developments such as disconnections at scale and eventually decommissioning.

A1.11 However, our principal objective remains to protect the interests of both current and future energy consumers. We are bound by duties to consider consumers' interests in Government achieving its net zero targets, as well as the need to support economic growth in GB. Legislative reform would take significant time to achieve and would not assist current energy consumers and industry to navigate the existing gas disconnections framework which is complex and costly.

A1.12 We will therefore prioritise the development of interim disconnections principles that align with our principal objectives and existing statutory duties (as well as those of the HSE), alongside amendments to the existing regulatory framework for gas disconnections across the short to medium-term to give effect to those principles. This may entail at a minimum:

- The development of new disconnections charging principles based on existing Ofgem and HSE statutory objectives and duties,
- Exploring the extension of economic regulation and consumer protections to all gas disconnections, and

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- Greater integration of system planning considerations in gas disconnections regulation³.

A1.13 See page 34 of the report for our Disconnections Action Plan and Appendix C for more information on our proposed solutions for reform.

³ Ofgem notes the inclusion and discussion of gas disconnections in NESO's latest Gas Market Roadmap.

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Area of Focus 2: Service Design

Summary of Issues

A1.14 The second area of focus centred on existing service delivery ‘pain points’ and what a ‘good’ disconnection service design would look like under different regulatory approaches. We sought to understand how different regulatory settings could enable greater innovation and better forms of service delivery by industry.

A1.15 It is clear to us that the existence of two different gas disconnection processes (see Figures 1 and 2 below) has created significant challenges for regulators, industry and consumers alike. The dual processes operate under different legal, operational and cost frameworks, leading to an inconsistent and fragmented service delivery. This divergence has resulted in inconsistent customer experiences, unclear responsibilities and a lack of standardised procedures.

Figure 1: The current process for Voluntary Disconnections

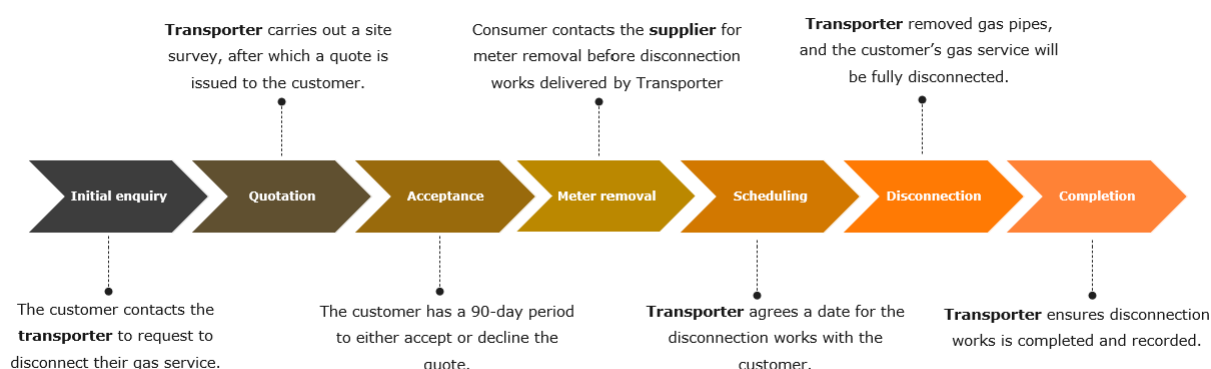
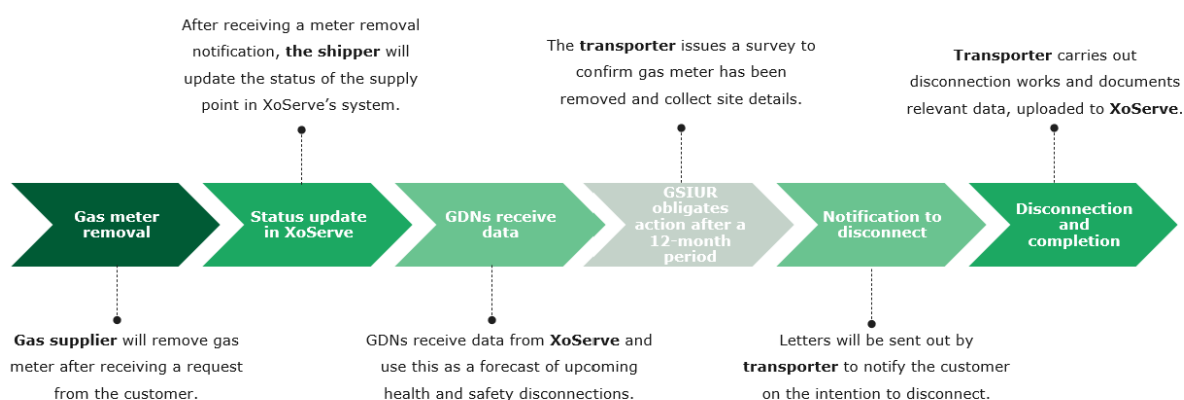


Figure 2: The current process for health and safety disconnections



A1.16 To address known pain points associated with current gas disconnections service design, we proposed several different regulatory frameworks to the sector, each with

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their own benefits and drawbacks and encouraged the sector to consider what service delivery would look like under those frameworks. These varied approaches, outlined in Table 2 below, were tested for alignment with the regulatory principles discussed with stakeholders in our earlier Gas Regulation (Disconnection Principles) workshop.

Table 2: Summary of level of alignment of the proposed regulatory approaches against the foundational principles

Principles	Approach 1: Maintain status quo and improve existing dual framework	Approach 2: HSE only approach (remove voluntary disconnections)	Approach 3: HSE to amend H&S process to incorporate into voluntary framework	Approach 4: Ofgem develops single framework based on HSE regulation	Approach 5: DESNZ develops new framework
Compliance/Governance	Partially aligned	Partially aligned	Partially aligned	Aligned	Aligned
Net Zero Planning	Not aligned	Not aligned	Not aligned	Partially aligned	Aligned
System Planning	Not aligned	Partially aligned	Partially aligned	Partially aligned	Aligned
Facilitating Competition	Not aligned	Not aligned	Partially aligned	Partially aligned	Aligned
Business Planning	Partially aligned	Partially aligned	Partially aligned	Partially aligned	Aligned
Consumer Protections	Not aligned	Not aligned	Aligned	Aligned	Aligned
Lowest Cost	Not aligned	Not aligned	Aligned	Aligned	Aligned
Quality and Safety	Not aligned	Aligned	Not aligned	Aligned	Aligned

Outcomes of Sector Engagement

A1.17 Broad consensus suggested that the development of a new framework had the most potential scope to deliver meaningful change. Stakeholders agreed that there needs to be strong economic regulation and robust consumer protection under any regulatory framework. However, there was no agreement as to what a new framework would look in practice, or how this would improve service delivery.

A1.18 A key issue raised by consumer representatives related to longer-term incentive misalignment that exists within the industry. Consumer representatives highlighted the need for genuine innovation and consumer-centred service delivery but recognised that excellence in disconnections service delivery hastened gas network

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decline and therefore did not align with commercial imperatives faced by Transporters.

- A1.19 Transporters made clear their views on the negative impact of policy uncertainty on their ability to innovate and drive efficiencies in the existing framework. Transporters were reluctant to develop new systems, processes and practices amidst a changing policy landscape. They also highlighted the need for clearer strategic direction, as well as delineated roles and responsibilities within disconnection regulations to ensure collaboration and cooperation between key parties with divergent interests.
- A1.20 Lastly, stakeholders were tasked with considering what short-term actions could be taken by us to deliver quick, tangible improvements to service design and consumer experience. The sector highlighted information and knowledge gaps as priority areas for us to take impactful short-term action on.

Ofgem's view

- A1.21 The development of a new regulatory framework could afford the sector a unique opportunity to re-design how gas disconnections are delivered. This may be a desirable approach for Government to take in the long-term to ensure gas disconnection services continue to meet evolving consumer needs across the energy transition and reflect business and policy developments including disconnections at scale and broader decommissioning.
- A1.22 However, pursuant to our existing principal objective and statutory duties we will act to protect the interests of current consumers, including those who may wish to disconnect before broader reforms can be progressed by Government. In the medium to long-term, the existing dual framework should transition towards a more unified disconnection framework, which enables consumer choice but complies with relevant health and safety duties⁴.
- A1.23 All sector stakeholders must be better aligned and incentivised to achieve a high-quality disconnections service. We therefore clarify our views on roles and responsibilities in Table 3 below, noting many of these require no further action as they are already codified within legislation, regulations and industry codes.

⁴ Including the requirement to disconnect a service from the main within 12 months of the meter being removed.

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A1.24 All parties regulated by Ofgem are responsible for cooperating with each other and providing reasonable assistance to one another to develop effective systems, practices and procedures to minimise disruption to consumers and provide a quality Gas Disconnection at lowest cost. We may introduce further requirements such as duties of cooperation should consumer feedback across the short-medium term necessitate it.

Table 3: Roles and responsibilities of sector stakeholders

ROLE	RESPONSIBILITIES
Suppliers	Remain responsible for managing the direct client relationship between energy consumers and the gas system. This means that Suppliers should be responsible for: • Developing and maintaining clear and consistent consumer information about meter removal and gas disconnection services. • Ensuring that consumer information about meter removal and gas disconnection services (including estimates of costs) is made available to consumers at the earliest opportunity, or failing that, upon request by the consumer. • Where reasonable to do so, facilitating both meter removal and gas disconnection services on behalf of the consumer. Facilitation must be on a non-discriminatory basis and should have regard to the need to foster competition within the sector. • Where such services are not delivered directly by the Supplier or by a subcontractor to the Supplier, Suppliers should take reasonable steps to assist consumers to successfully contact their new delivery partner, be that a UIP or a Gas Transporter.
Gas Transporters	Remain responsible for discharging their pipeline safety obligations under the GSIURs and delivering a quality disconnections service (where requested by the consumer). • Where a basic disconnection is requested and where costs are socialised under the Volume Driver, we expect that the service will be at a time and date of the Transporter's discretion within 12 months, at no cost to the consumer. • Where a consumer requests a disconnection which substantially fetters the Transporter's discretion, be that due to specific expectations around the timing or method of disconnection, the Transporter will be entitled to charge a reasonable service fee reflecting the impacts of the consumer's request.

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UIPs (where engaged independently by consumers as an alternative to Supplier or Transporter services)	Have no formal responsibilities under energy laws but remain responsible for complying with their own safety and consumer protection obligations under relevant laws. They will continue to play a vital role in constraining meter removal and disconnection costs by providing a competing service to Suppliers and Transporters respectively. See Appendix C for further information on UIPs and their role in gas disconnections.
Central Data Service Provider	Continue to be responsible for facilitating data sharing between Suppliers and Transporters (via Shippers where necessary) pursuant to its obligations under relevant licences and industry codes.

A1.25 Please refer to sections 4.16, 4.26 and 4.28 and our stakeholder recommendations on page 29 for more discussion on roles and responsibilities in the disconnection process.

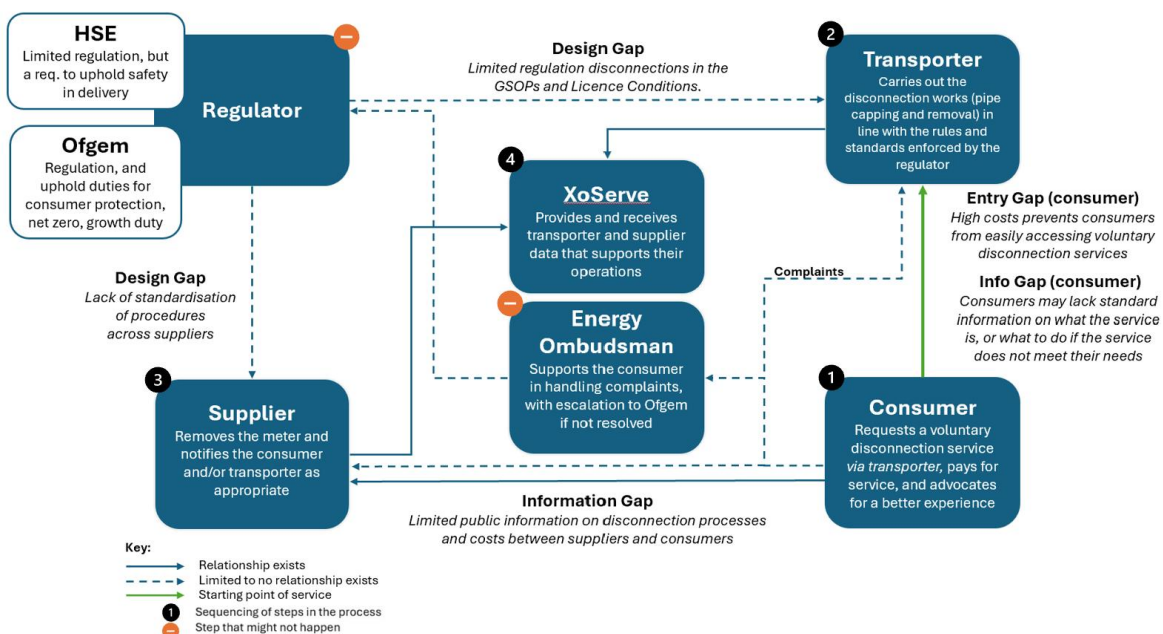
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Area of Focus 3: Access

Summary of Issues

- A1.26 The third area focused on consumers' ability to access services in accordance with need and where reasonable, preference without facing undue discrimination. We sought to understand diverse consumer requirements and preferences, as well as what barriers consumers, including vulnerable consumers, might face in accessing a quality gas disconnection service.
- A1.27 Ensuring reasonable access to disconnection services is an essential part of good service design. However, owing to the complexity of the current gas disconnection framework (see Figures 3 and 4 below), existing services may not provide clear and consistent access that is proportionate with consumer or industry needs.
- A1.28 Figure 3 illustrates that Voluntary Disconnections may offer a clearer pathway for consumers, with a direct route to Gas Transporters, defined steps and clear timelines. While more transparent than the H&S process, high and variable costs can still deter access.

Figure 3: Gaps that contribute to access issues in Voluntary Disconnections

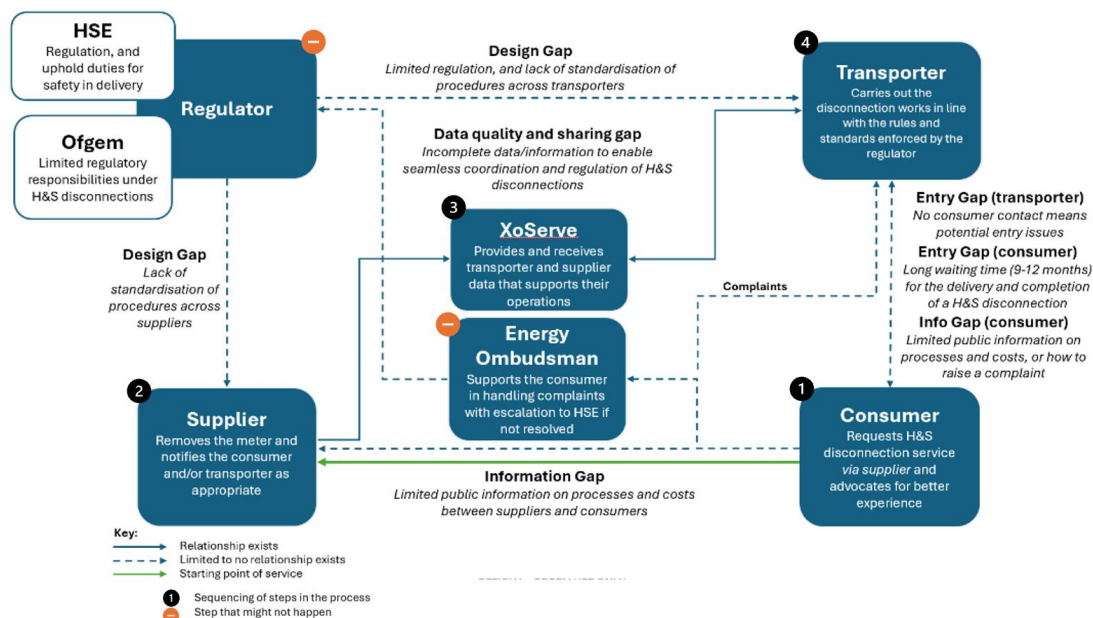


- A1.29 Figure 4 displays that H&S processes lack clear entry points, public information is limited, and consumers often don't understand what the service will entail. The initial point of contact is the Supplier to remove the meter, however further work to

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remove the pipe is carried out 12 months later by the Transporter. The Transporter has no direct relationship with the consumer, which often leads to access issues, and lower consumer confidence and satisfaction for the service.

Figure 4: Gaps that contribute to access issues in H&S Disconnections



A1.30 We discussed with stakeholders a series of access requirements across the disconnection life cycle (pre-service, mid-flight, aftercare and ongoing) – see Table 3 below. Key considerations included access needs for vulnerable consumers, identifying who might be responsible for ensuring access, and the impact these requirements would have on competition, growth and innovation in the sector. These requirements could be adopted at different stages of framework review, depending on scale of approach to improve accessibility for consumers wanting disconnection services.

Table 3: Access requirements across disconnections service delivery

Category	Description
Informational	Refers to consumers being able to access clear information and guidance they need to be able to easily navigate the disconnection process(es).
Service Entry	Refers to consumers being able to easily initiate the disconnection process through knowing who to contact and how, whether that's through a phone call, email or letter.

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Cost	Refers to the charging of a disconnection service and that it is transparent, fair and is at the lowest cost possible for both business and consumers. <i>Discussed as part of focus area on costs.</i>
Operational	Refers to industry being able to seamlessly deliver the physical disconnection process in a timely manner with minimal delays and duplication.
Physical Entry	Refers to industry being able to access properties to conduct the physical disconnection of gas pipes.
Equity	Refers to industry being able to consistently consider consumer needs, in particular, vulnerable consumer needs, throughout the disconnection process.
Compliance	Refers to all parties abiding by relevant legislation, licensing and standard practices throughout the lifecycle of the disconnection process(es).

A1.31 These access requirements were derived from a range of sources, including existing energy law requirements pertaining to gas connections, consumer law requirements applying to the economy at large, human rights discourse on vulnerability and academic studies on service design.

Outcomes of Sector Engagement

A1.32 Sustainability First, through their Disconnections Strawman First document⁵ provided specific evidence of this issue through a review of existing public-domain Supplier and Transporter materials illustrating inconsistency in approach.

A1.33 Sector representatives from both industry and consumer quarters jointly agreed that informational issues in the current framework could be resolved in the short-term to address consumer awareness and clarify current industry delivery requirements. However, most Transporters considered that Suppliers are better placed to provide clear, comprehensive information on disconnections services. Suppliers did not agree because under current processes, a Supplier's direct relationship with the consumer typically ends at the point of meter removal. Further discussion revealed that this creates a gap in the effective handover between Suppliers and Gas Transporters, which can lead to a loss of continuity in communication and support. This finding reinforces the case for Suppliers to take a more active role in leading the

⁵ Sustainability First [Strawman First – Gas Disconnection](#) document, published March 2026.

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overall consumer relationship, ensuring that consumers receive consistent and adequate information throughout the disconnection journey.

- A1.34 Consumer representatives Sustainability First and Citizens Advice, raised the importance of considering the needs of vulnerable consumers, and were eager to understand the level of support vulnerable consumers currently receive. Transporters noted that vulnerable consumers are currently considered on a case-by-case basis. Several stakeholders felt that further work needs to be undertaken to support enhanced outcomes and consistent treatment across industry for this group.
- A1.35 The issue of accessing disconnection services was drawn out in the report's key findings (see Chapter 4) and Part A of the 'Findings – quantitative and qualitative evidence' section of the report.

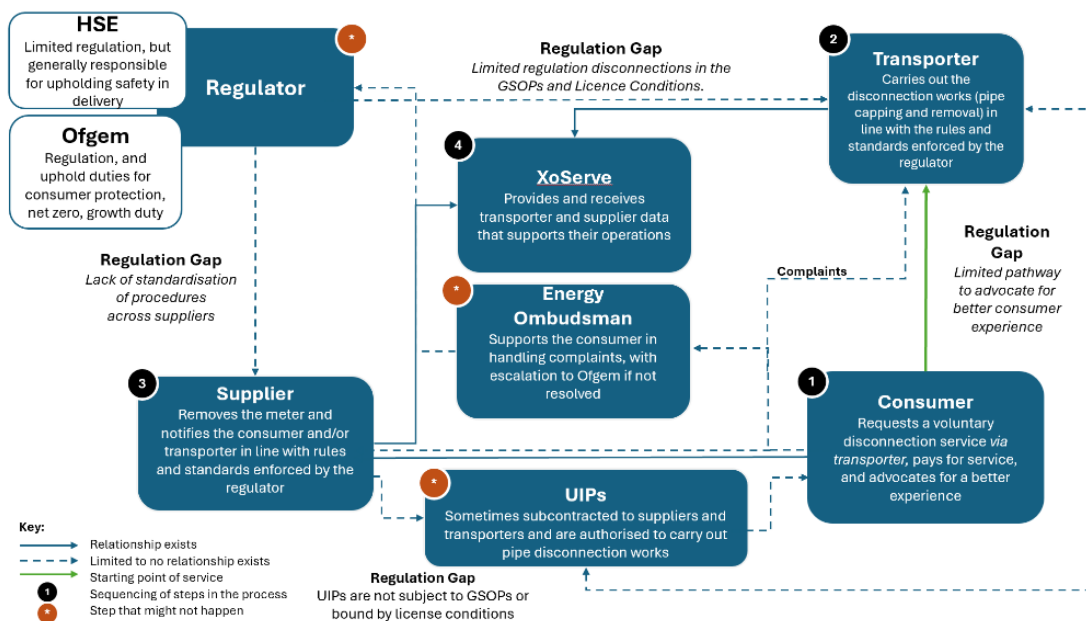
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Area of Focus 4: Quality and Safety

Summary of Issues

- A1.36 The fourth area of focus centres on service quality across the gas disconnection process which broadly refers to the communication, adaptability, and workmanship (including safety) of service providers across the gas disconnections process. We invited views on consumer expectations, operational requirements, as well as regulatory, legal or engineering constraints.
- A1.37 Ensuring high service quality is important because it directly shapes consumer safety, confidence and trust, while also underpinning the integrity of the gas network as it transitions. A mismatch between expected and actual outcomes leaves consumers uncertain about what work has been carried out, why there may be additional charges, whether their property is genuinely safe, and who remains responsible for any future issues. Further, as Sustainability First noted, this disproportionately affects vulnerable consumers and small non-domestic users with limited technical understanding or bargaining power⁶.

Figure 5: Snapshot of responsibilities and regulatory gaps in Voluntary Disconnections



⁶ Sustainability First [Strawman First – Gas Disconnection](#) document, published March 2026

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- A1.38 A quality service is also one that ensures core safety protocols and measures are strictly followed, and a principle that should be upheld in the review and/or redesign of the disconnection framework. Safety is a core component of the delivery of gas disconnection works particularly in assessing and controlling risks associated with gas infrastructure in-situ (pre- or post- disconnection) to prevent harm to consumers, workers and the wider public, including risks of gas leaks, fire and explosion. In GB, regulating safety in relation to gas infrastructure is the responsibility of HSE, supported by the GSIUR 1998, and PSR 1996, with specific safety requirements for disconnections. Relevant roles and responsibilities across the existing framework for ensuring quality (including safety) is detailed in Figure 6.
- A1.39 There were several requirements that should be considered when providing high-quality services, which range across the delivery cycle, spanning various delivery bodies (Figure 6 below). Like access, these requirements could be adopted at different stages of the framework review, depending on scale of approach to ensure adequate quality for consumers receiving disconnection services (Table 4 below).

Figure 6: Snapshot of responsibilities and regulatory gaps in H&S Disconnections

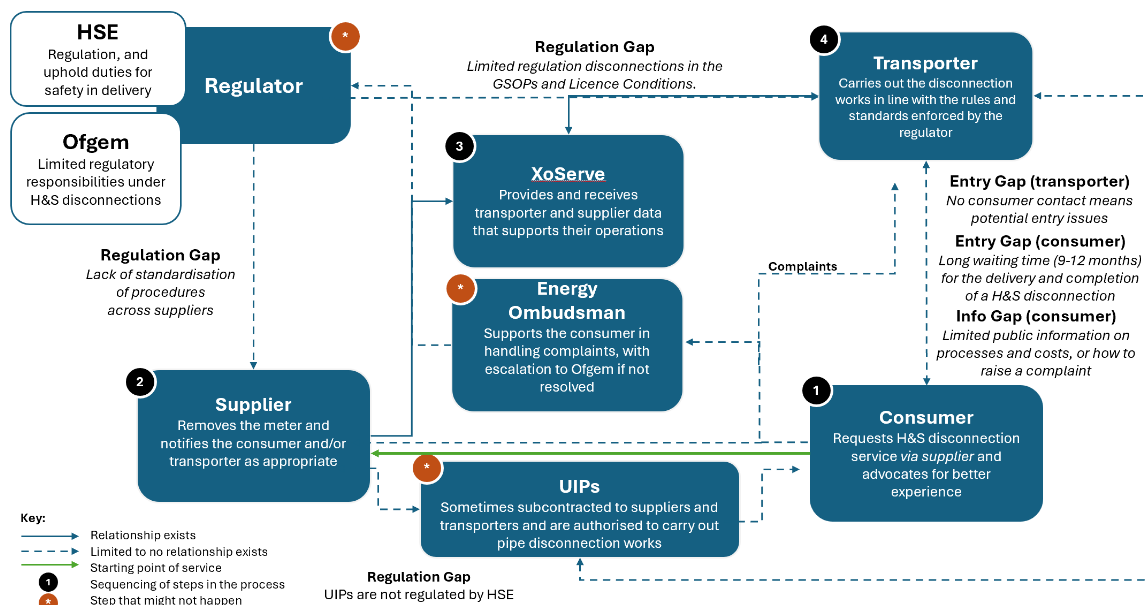


Table 4: Quality requirements across disconnections service delivery

Category	Description
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Informational	Refers to the quality of information consumers are receiving, enabling them to understand the disconnection process(es).
Operational	Refers to industry being able to consistently deliver services that meet quality standards.
Safety	Refers to practices being carried out in accordance with safety guidelines to ensure safety of both workers and consumers.
Verification	Refers to clear communication lines between Gas Transporters, Suppliers and consumers to ensure that the work is being delivered are receiving accurate data and notifications of meter removals.
Complaints	Refers to the existence of quality complaint processes in place that support and enhance the end-to-end consumer experience.
Monitoring	Refers to the quality standard of record keeping for the disconnection site.

Outcomes of Sector Engagement

- A1.40 Regarding customer satisfaction, limited feedback was received from Suppliers regarding customer complaints processes.
- A1.41 Regarding safety, GDNs raised that further work could be done to alert customers about the safety implications of meter removal, or the sequential next steps in the gas disconnection process. Gas Transporters also had concerns about illegal connections, and gas theft, which they noted should be considered alongside amendments to regulation for disconnection works.
- A1.42 Regarding roles and responsibilities, concerns were raised by Gas Transporters as to who should manage the process, with stakeholder groups noting that Suppliers should be managing the consumer-facing aspect of the service, as they are the body that has a direct consumer relationship. Consumer advocates agreed with Transporters that Suppliers should be the first point of call to manage the disconnection process⁷, as many core quality issues are about customer care and the consumer journey throughout the process.
- A1.43 Please refer to Part B of the ‘Findings – quantitative and qualitative evidence’ section of the report for further discussion on the delivery of a quality service.

⁷ Sustainability First [Strawman First – Gas Disconnection](#) document, also noted on Page 2, published March 2026

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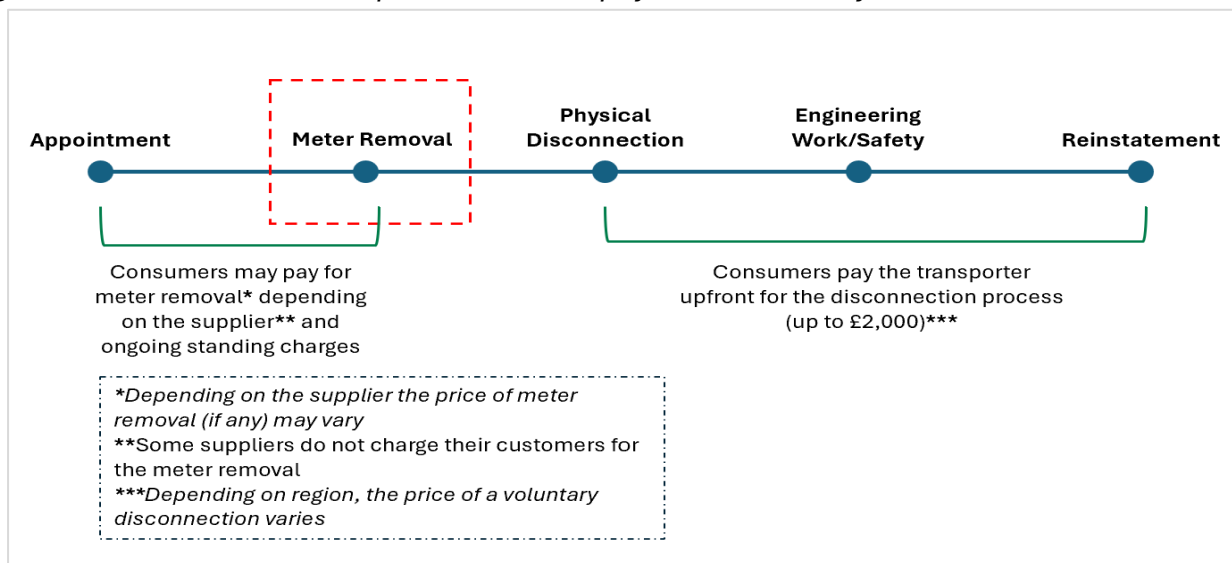
Area of Focus 5: Costs and Prices

Summary of Issues:

A1.44 The final area of focus pertains to the costs and prices of delivering gas disconnection services across GB⁸.

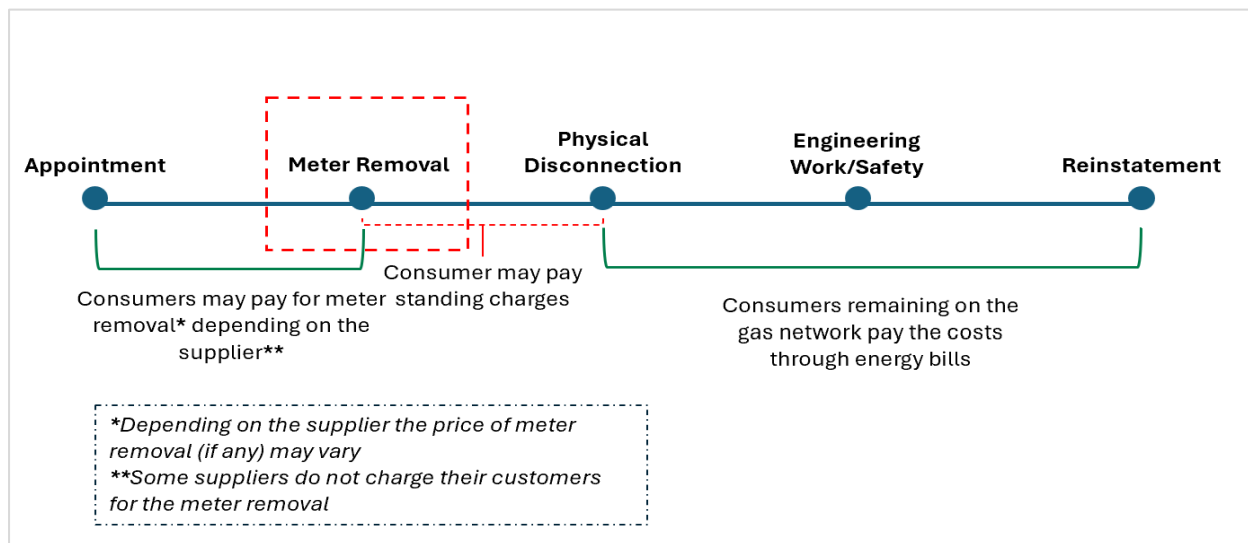
A1.45 Evidence gathered throughout the review demonstrates that the current framework produces materially different financial outcomes for consumers depending on the route they access. Consumers pay different amounts for a gas disconnection depending on whether they request the disconnection from their Transporter (voluntary route) or from their Supplier (H&S route). Further, while charges can vary by route, what a consumer may pay can also vary depending on a range of factors, including where they live, complexity or scale of the works, whether contractors are used, and Supplier charging practices for meter removal (see Figures 7 and 8).

Figure 7: An illustration of the price consumer pays for a Voluntary Disconnection



⁸ For the purposes of this review, we define a cost as the total resources required to deliver an end-to-end gas disconnection service including labour, materials, civils, street works, administrative and compliance costs. We define price as the amount ultimately charged to, or recovered from, consumers – this is either directly through upfront fees or indirectly through socialised charges on energy bills.

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Figure 8: An illustration of the price consumer pays for a H&S Disconnection

A1.46 Consumers currently face drastically different disconnection prices and depending on route and charging practices; some consumers pay nothing, some consumers just pay for meter removal, and some pay for the disconnection and meter removal. While the actual average price of a Voluntary Disconnection is higher than listed publicly, the figures in Table 5 illustrate a sample of the pricing volatility for a gas meter removal service.

Table 5: Publicly available prices for gas meter removals

Company	Price	Year Published
Octopus Energy ⁹	£0 ¹⁰	2021
EoN Next ¹¹	£235	2026
Ovo Energy ¹²	£141	2026
EDF ¹³	£80	2026
Scottish Power ¹⁴	>£200	2024

⁹ [How to disconnect your gas supply | Octopus Energy](#)

¹⁰ Octopus energy currently do not charge their customers for a gas meter removal as they receive a small number of requests.

¹¹ [A list of the additional charges and fees | Eon Next](#)

¹² [Our charges list | Ovo Energy](#)

¹³ [How to remove a meter | EDF](#)

¹⁴ Reported by a consumer on a forum [Scottish Power charging to remove gas meter — MoneySavingExpert Forum](#)

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- A1.47 The drivers of gas disconnection costs are complex and varied; there are multiple actors involved in reducing costs and prices, and there are potential roles for both competition and innovation in the lowering of costs, and therefore prices.
- A1.48 We suggested a phased approach, where we pursue short-, medium-, and long-term options concurrently to support equity in disconnection cost and prices. One potential medium-term outcome discussed with stakeholders was a merged H&S and voluntary pathway, where majority consumers are directed to the 'fee-free' route, with a pay for service option (for a bespoke service) with the ideal outcome of this design to inform a singular framework for disconnections (following legislative review).

Outcomes of Sector Engagement

- A1.49 Discussion examined the costs of delivering gas disconnection services and stakeholders focused on identifying the main operational drivers and where efficiencies may or may not be achievable as volumes increase.
- A1.50 Regarding labour costs, Gas Transporters noted that as disconnection volumes increase, they may be at pressure of operating under labour shortages, as competition for skilled workers is likely to intensify, placing upward pressure on costs unless workforce planning improves. In relation to civils and street works costs Gas Transporters noted costs were high in urban areas where permitting, traffic management and reinstatement requirements are more onerous. The cost of materials was generally not viewed as a material cost driver relative to other categories. IGTs highlighted that their smaller consumer bases limit their ability to absorb rising H&S Disconnection costs in the same way as larger GDNs.
- A1.51 Stakeholders also discussed how these underlying costs translate into prices faced by consumers, including views on cost-recovery, transparency, and the role of competition. Regarding disconnection prices (cost-recovery), stakeholders noted that: prices paid by consumers vary significantly depending on the route taken, geographic location, complexity, and existing charging practices.

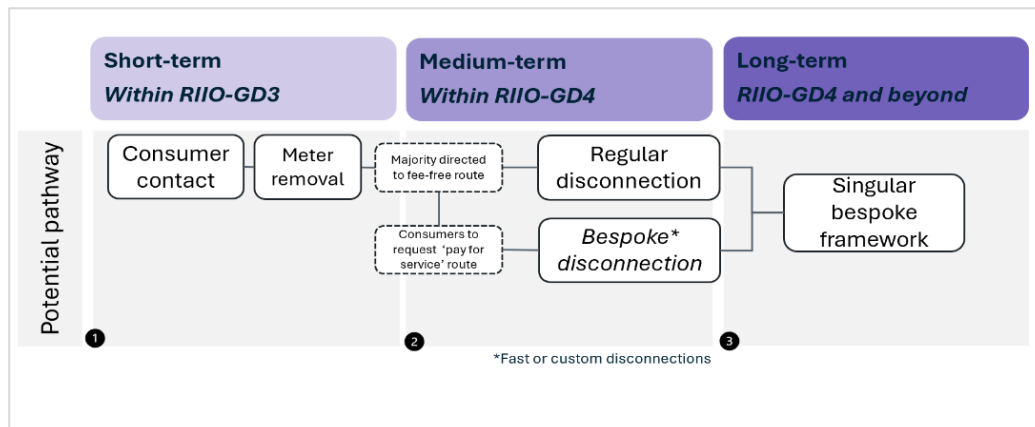
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A1.52 Sector participants, in particular consumer advocates, advised that competition should not be prioritised unnecessarily, reflecting the recent findings of the 2026 Ofgem Review¹⁵.

A1.53 In relation to future pricing arrangements, broad consensus existed that the H&S Volume Driver represented a reasonable short-term approach to containing and monitoring associated costs. However, most stakeholders expressed concerns about the sustainability of this model, preferring a new cost-recovery model be developed to ensure intergenerational equity. There was no cross-sector agreement on the best approach to monitoring and containing the costs of Voluntary Disconnections; some Gas Transporters expressed disagreement with proposals to further regulate or limit price increases.

A1.54 The variation in costs and prices of disconnections was a key finding of the report (see Chapter 4). For further discussion on costs and prices please refer to Part C of the ‘Findings – quantitative and qualitative evidence’ section of the report.

Figure 9: *The proposed pathway to resolving price inequity in disconnections*



Acknowledgements and Limitations

A1.55 We have supplemented data and evidence gathered with sector feedback and insights collected via our CFI and sector workshops to derive Gas Disconnections areas of focus which we intend to address moving forward. The identification of

¹⁵ DESNZ (2026), *Ofgem Review: Final Report*, published 22 April 2026. Available at: <https://www.gov.uk/government/publications/ofgem-review-2026/ofgem-review-final-report>

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issues, and development of solutions was largely achieved through our sector workshop series. Despite our confidence in our findings, we nevertheless highlight several acknowledgements and limitations of our work before finalising this review and setting out our next steps.

- A1.56 We acknowledge that we launched our Disconnections Review with limited scope and an initial focus on exploring the issues around the physical disconnection process carried out by Transporters only. The process of meter removals was not considered in scope however, we now consider meter removals and their associated costs (and flow on impacts to service quality) as an integral part of the disconnection process, with limited recommendations for reform in the section below.
- A1.57 Following the workshops we discovered a very complex landscape split between domestic and non-domestic users who will require quality disconnections services across the energy transition. Although there was some discussion on disconnections for non-domestic users, we acknowledge there is further work that needs to be undertaken to appropriately protect the interests of non-domestic consumers. While we will continue to explore options for non-domestic users moving forward, we acknowledge that our Disconnections Action Plan (DAP), may fall short of the expectations of non-domestic consumers for now.
- A1.58 This review did not consider the role of Electricity Distribution Network Operators (DNOs), despite their position as the receiver of consumers seeking gas disconnections. As the likely recipients of consumers seeking gas disconnections, significant opportunities exist for further collaboration between Gas Transporters, Suppliers and these energy companies. DNOs were not included within this review as the Review focussed on existing regulatory levers and options, and the statutory separation that presently exists between gas and electricity systems.
- A1.59 We acknowledge our reliance on consumer representatives to reflect the needs of vulnerable consumers across this Review. We understand that vulnerable consumers have diverse needs and that policy reform must account for those needs. As part of our DAP, we will take priority actions to address the needs of consumers that have emerged from this review and ensure that diverse consumer perspectives are incorporated during implementation.