

*By e-mail*  
John Benson  
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Dear John,

Thank you for the opportunity to comment on the most recent consultation - 'Development of multiple interruption and other standards for electricity distribution: Consultation on Draft Determination of Overall Standard and Implementation Arrangements for Guaranteed Standard'. As you know we have been involved in the various stages of the development of this standard and we believe you are aware of our concerns.

We are pleased that the standard has been implemented and believe it will incentivise distribution companies to upgrade the parts of their network that suffer repeated failures and hence constantly inconvenience customers.

We believe that the guidance notes, which are currently being reviewed, should state clearly and without room for interpretation the number and length of interruptions that can occur before the Distribution Business has failed the standards.

Furthermore, we have some suggestions around the reporting requirements for the guaranteed standard. We believe that it would be useful to report not only on those claims where the guaranteed standard is paid but also the number of claims where it is not and the reasons why the Company believe the customer is not eligible. This will not only ensure that the system for claims is working efficiently but will also give an idea of whether consumers understand what they are entitled to and how to claim their compensation correctly.

Suppliers should also have sight of reports which detail the overall service provided in all distribution areas. Comparisons between Distribution Businesses could then be more easily undertaken.

I hope these comments are helpful. Please do not hesitate to contact me if there are any questions on this response.

Yours sincerely

Alison Pettifer  
Regulatory Issues Manager