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28 February 2013

Dear Andrius,

Please find below E.ON's response to Ofgem's call for information on Supplier Guaranteed and Overall Standards of Performance.

**Role and Scope of GOSP**

GOSP have been an effective tool, however some of the standards have been superseded by changes in regulation within our industry. The forthcoming Standards of Conduct support our position of ensuring all customers are treated fairly.

We believe that the Guaranteed Standards relating to appointments and prepayment meters are still relevant and compensation payments are still appropriate in these circumstances. We believe where compensation payments are made, they should be aligned for both fuels. The Guaranteed Standard for payments to customers should be retained, however it should be made clearer that the 10 days allowed to make the payment to the customer, begins from when we are made aware of the customers entitlement to the payment.

We consider the Guaranteed Standards for Charges and Payments, Meter Disputes, Disputes to be no longer relevant. The existing Complaints Handling Standards Regulations and the Ombudsman mandates that all complaints are acknowledged and resolved in a timely manner. Complaints handling procedures are required to detail where customers can go for independent advice and where they can go if they are not satisfied. The Code of Practice for Accurate Bills in 2007, confirms suppliers' commitment to bill customers regularly and accurately.

All of the Overall Standards (re-siting meter, restoring supply after payment, change in payment method or supplier and prepayment meter

dysfunctional) happen very infrequently and whilst it is our standard practice to meet these standards of performance, Standards of Conduct will mandate that customers are protected in these situations, so they are no longer fit for purpose and as such will not need to be reported on.

For those that we believe are relevant, all consumer groups will feel they are important. Having protections is important for all customer groups, however the current one size fits all for customer groups and all protections under GOSP is not seen as appropriate. There are often situations where in addition to the GOSP payment, we will also offer a more customer centric resolution. Some consideration needs to be given to whether there needs to be different redress for each individual customer group. Vulnerable groups already have additional protections. For example, Safety Net which was established in 2004 already ensures that vulnerable customers will not knowingly be disconnected.

### **GOSP transparency**

Information on GOSP can be found on our website. We produce and send all customers information on GOSP by post on an annual basis, however we are unable to measure how many customers read this communication, as until they are subject to a failure the information does not bare any relevance. To raise awareness we believe it would be better to communicate how customers can access information on GOSP on customer bill as they are received and read more frequently.

The current reporting on performance is published on our website. Standards of Conduct will require us to present more information with customers than currently. It will be up to suppliers to ensure the information is focussed on what is important to their customers against a challenge of not overloading with information that isn't useful to them.

### **Future market developments and GOSP**

Smart metering will bring its own challenges including a difference in the type of service a customer would expect. As we rollout the installation of smart meters to every home by 2019, the likelihood of appointment failures will increase due to the increase in demand. Whilst we support retaining a Guaranteed Standard on appointments, the mass rollout of smart meters is likely to affect performance against this standard.

Standards of Conduct will offer customers the protections that meet their needs, making the current GOSP no longer fit for purpose