

Andrius Cialka
Ofgem
9 Millbank
London
SW1P 3GE

February 28th 2013

Dear Mr. Cialka,

Supplier Guaranteed and Overall Standards of Performance Review – Call for Evidence

Please find our response to the above consultation below.

Question 1. Are GOSP an effective tool for protecting consumers in the retail energy market?

We believe so as they provide consumers with an appropriate level of reassurance and provide for financial penalties to suppliers should they fail to carry out the prescribed functions within the designated timescales.

Question 2. To which groups of consumers are Guaranteed Standards (GS) relevant and useful? Are they of equal relevance and value to all consumer groups, including domestic, SMEs and large business?

We believe that they are relevant and useful to all customers, both domestic and non-domestic. However, it seems reasonable to assume that they are of proportionally greater value to domestic customers as they guarantee supplier responses within a defined timeframe for essential services on which households rely such as the ability to heat the home, cook etc.

Question 3. Is the GS on Charges and Payments, which only applies to the previous Public Electricity Suppliers (PES), still appropriate? If so, should it be extended to all suppliers?

Our view is that this is no longer required as suppliers over a certain size are, by licence, required to offer a variety of payment methods to consumers.

Question 4. Are there any customer service areas that no longer need to be covered by the GOSP? Are there any service areas that are not covered by the GOSP, but should be?

We believe the current requirements are sufficient and should be left as they are.

Question 5. Which customer service areas are appropriate for compensation approach under the GS and which service areas are appropriate for performance reporting approach under the OS?

We believe the current demarcations are sufficient.

Question 6. Are the current levels of compensation under the GS still appropriate? Should they be different for different customer groups?

We believe the general levels of compensation are suitable, however we would not be opposed to higher levels being introduced for vulnerable customers in relation to pre-payments in order to create a sharper incentive for suppliers to deal with these customers' issues in relation to that specific area within the appropriate timeframe.

Question 7. What is the overall consumer awareness of the GOSP? To what extent should consumers be aware of the GS and OS and what is the best way for achieving this?

Our experience would suggest that there is some awareness of the GOSP amongst consumers but that this is not as widespread as it could be. Perhaps a Government backed campaign advertising the existence of these as well as where consumers can find more related information would be appropriate.

Question 8. What is the best way for suppliers to demonstrate that they meet and where appropriate, exceed the GOSP?

We believe that the current requirements around this are sufficient.

Question 9. To what extent will each of the current GOSP remain appropriate in light of market developments such as smart metering?

Our view is that the standards of service around prepayment meters will need to be revised once smart meters become widespread as, rather than prepayment meters, there will most likely simply be smart meters running in prepayment mode.

Please do not hesitate to contact me should you have any questions or require any further information.

Yours sincerely,

Chris Hill

Regulation Manager