

**Question 1:** *Do you agree that a GS should be created, replacing the existing OS, to cover the time taken for suppliers to reconnect customers disconnected for unpaid charges once the debt has been repaid/an agreement reached? Would the core requirements of the standard need to change from those set out in the existing OS standard?*

Whilst the volume of consumers disconnected across the industry for unpaid charges is limited and the introduction of smart metering will provide greater access to smart prepayment in the future, we agree that it may be prudent to retain such a standard. This will ensure that any consumers which are disconnected have some degree of protection in relation to the reconnection of their supply.

**Question 2:** *Do you agree that the existing GS and OS should be merged to create a revised GS on acting quickly to repair or replace a faulty prepayment meter? Would the core requirements of the existing standard need to change, for example aligning the timeframes for visit?*

We agree that the duplication across both GS and OS for this standard is not required and we welcome the proposal to combine these and retain a revised GS. The current arrangements have a number of misalignments across fuels which should be addressed to provide consistency. These include the timeframe for response (3hrs/4hrs), consistency of approach across working and non-working days and the definition of the start of the working day (7am/8am).

A consistent GS approach across both gas and electricity would be welcome to provide simplification. We recommend that the working day should be defined as 8am to 8pm and all response timeframes should be within 4 hours. This will assist operational delivery and provide a consistent, easy to understand approach for consumers.

**Question 3:** *Do you agree that the GS to cover the making and keeping of appointments by suppliers should be retained? Would the core requirements of the existing standard in this area need to change and if so, how?*

The current standard for appointments prescribes that a supplier must offer and keep an appointment within a time window which is: either wholly before 1pm or wholly after noon or within a prescribed two hour window.

The vast majority of appointments that will be made over the next six years will relate to meter exchanges associated with the smart meter roll-out. From our experience to date of

upgrading to smart metering, it is evident that the installation takes longer and is less predictable than for a traditional meter exchange. This has obvious implications for the number of appointments/exchanges that can be made/undertaken by an individual engineer each day. Whilst we agree that providing customers with an appointment is entirely appropriate, the structure of appointment standards must be carefully considered.

We believe that the current appointment definition, as detailed above, provides a fair balance between the operational requirements associated with a large scale meter roll-out and the requirements of the customer. The agreement of a convenient appointment should be left between the supplier and consumer to agree. We are concerned that any further prescription of obligations in this area may not be beneficial to the roll-out of smart metering. We do not agree that any potential changes e.g. a move to offering a three hour appointment as standard, could be introduced without first having a detailed, evidence based assessment of the operational impacts and costs undertaken, to fully understand the implications of any such change to the national smart roll-out.

As Suppliers have obligations to exchange all traditional metering by 2020, we are already incentivised to react to consumers individual requirements where required, for example to accommodate those with differing lifestyles and working patterns.

In summary, we agree that a GS should remain in this area, that arrangements should be standardised across both fuels, but that the definition of an appointment should not be altered from its current definition at this time.

***Question 4:*** *Do you agree that the GS for faulty metering should be retained? Do any of the core requirements need to change, and if so, how?*

We agree that this standard should be retained, as it is important to address consumer concerns relating to potential faulty metering.

***Question 5:*** *Do you agree that the OS for resiting meters can be removed? How will suppliers manage requests from customers wishing to have their meters resited in the absence of a performance standard in this area?*

We agree that the OS for the resiting of meters can be removed and agree with Ofgem that other existing requirements provide protection for consumers who need to have their meter resited. During the roll-out of smart meters, all consumers will be visited within the next six years, some of which will require the meter to be resited as part of the smart meter installation.

**Question 6:** *Do you agree that the existing OS requirement for changing the basis of charging involving a change of meter should be removed? How will suppliers seek to manage requests from customers in the absence of a performance standard in this area?*

We agree that this OS should be removed and concur that suppliers have a strong commercial incentive to arrange payment methods that allow their customers to pay for the gas and electricity they use.

We will continue to agree payment options with all of our consumers where requested and where a change of meter is agreed we will continue to undertake the exchange at the earliest possible opportunity. In future consumers will have smart meters with prepayment functionality, making a change to the choice of payment method easier to enact once agreed with the customer.

**Question 7:** *Do you agree that the GS applying solely to customers served by an ex-PES supplier operating in their ex-PES area should be removed?*

Whilst this does not impact British Gas (as we are not an ex-Public Electricity Supplier), we agree that this standard should be removed to assist in the simplification of future arrangements.

**Question 8:** *We would welcome views along with supporting evidence on whether the revised GS should apply to micro business customers as well as domestic. We would also be interested in views regarding whether coverage should be limited to a subset of micro business customers and if so how any such subset might be defined, and whether only certain of the revised GS might apply to them.*

We concur with Ofgem that there are significant differences between the business and domestic markets and that the nature of commercial relationships that suppliers build with business customers (small or large) are typically very different to those with domestic customers.

When making appointments with any of our business customers (micro or non-micro), we already give consideration to individual customer circumstances and seek to offer and arrange mutually-convenient appointments when scheduling work, to minimise disruption and inconvenience to them, ultimately to protect our commercial relationship with them.

We also note that where a micro-business customer is dissatisfied with the performance of their supplier, they can address this directly with their supplier, or seek appropriate redress from the Ombudsman. Therefore any inclusion of micro businesses, in the new GS regime will introduce a degree of unnecessary duplication and add complexity.

Moreover, to introduce a subset category of micro-businesses would add considerable complexity to customer interactions and thus inconvenience for the customer (in order to collect the necessary information to categorise them correctly). And based on our past experience of implementing different operational processes and practices to accommodate micro-businesses (since first introduced in 2008), introducing a sub-set category would drive additional cost on Suppliers to implement with no proven benefit.

Therefore, we do not believe that the revised GS regime should apply to micro business customers (or any subset thereof) and this should apply consistently across both gas and electricity.

**Question 9:** *Are there any areas of the regulations where you think the obligations could be clarified? Please explain why.*

Please see our response to Question 10 below.

**Question 10:** *Do you agree that the definition of working hours should be aligned? If so, what should those working hours be?*

An issue which was flagged within the call for evidence related to inconsistencies relating to the current definition of 'Working Hours'. For Gas, working hours are currently defined as 8am to 8pm for each working day, whereas for Electricity they are defined as 7am to 7pm. Both fuels have a consistent 'other' working day definition of 9am to 5pm.

We agree that there should be alignment across fuels of the definition of working hours and that the definition should be 8am to 8pm for a working day and 9am to 5pm for any other day.

**Question 11:** *Do you agree that payment levels should be aligned and increased to £29 for all standards? What method should be used to decide revised payment levels going forwards and how frequently should this review take place? Do you think that it would be appropriate to set differing payment levels for differing GS accounting for the likely impacts when each GS is breached?*

We agree that there should be alignment of payment levels across both gas and electricity, removing the existing discrepancy and agree that an increase to £29 is a reasonable adjustment when taking into account the impacts of inflation since 2002. We agree that it may be prudent to review these values periodically, undertaken in alignment with any review of the GS regime.

We do not believe that the approach to determining payment levels should be complicated by the introduction of varying payment levels for each GS, as we concur with Ofgem's view that the aim of any payment regime should continue to reflect consumer inconvenience rather than address any actual loss. It would be extremely difficult to establish an evidence based methodology which could assess consumer inconvenience for each GS as by its nature, inconvenience to any customer is specific on a case by case basis.

**Question 12:** *If the revised GS are applied to both domestic and micro-business customers, do you agree that the payment level should be the same?*

Though we do not believe that GS should be applicable to micro-business consumers, should GS ultimately be deemed applicable to these consumers, we agree that the payment levels between domestic and micro-business consumers should be consistent, as these payments are not issued to compensate for any specific financial loss or detriment.

**Question 13:** *Do you agree that suppliers should be given flexibility in how to inform customers' of their rights under the supplier GS? Are there other options for raising awareness more generally?*

We agree that suppliers should be given flexibility in how to inform consumers, however whilst suppliers continue to have obligations to send notice of rights to customers annually on behalf of electricity distributors and gas transporters, a single annual notification may continue to be the most effective solution. However, should suppliers identify more effective ways of sharing this information with consumers, this should be encouraged, particular as it is unclear whether consumers read or value this information.

**Question 14:** *Do you agree that suppliers' should be required to provide information about their performance, with flexibility in how to do so, via the Regulations? How might suppliers increase transparency about their performance?*

Given the existing requirement on Citizens Advice to publish information on GS performance, any additional requirement placed upon suppliers could be viewed as being unnecessary duplication. Supplier sign-posting to this centrally held information could simplify arrangements and ensure consistency and impartiality from a consumer perspective.