

Jonathan Blagrove
Consumer Policy and Insight
Ofgem
9 Millbank
London
SW1P 3GE

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Dear Mr Blagrove

Consultation on the Supplier Guaranteed and Overall Standards of Performance

We welcome the opportunity to comment on this consultation. We continue to believe that strong customer protection is necessary for the key public service that the energy industry provides to customers in Great Britain. In general we support the aims and direction of the consultation. We have not responded to the specific consultation questions but wish to raise a specific issue which represents a shortfall in customer service.

There is one area where we believe Suppliers are not providing a sensible service currently to customers and it is therefore important that we at least retain the current arrangements – although we also believe there is a case for doing more.

When the Public Electricity Suppliers (PESs) were unbundled into Supplier and Distributors in 2000, the Supply business retained the obligation to operate meters and the responsibility to manage routine energization and de-energization. A key need for this service is when a domestic customer requires their electrician to work on the customer's consumer unit – as in most installations the only way to make the customer's meter tails dead is by withdrawing the cutout fuse – ie by de-energization. Suppliers in the main have failed to be proactive in offering a sensible, quick and effective service for this, which has resulted in private electricians withdrawing the cutout fuse illegally, or working live inappropriately and illegally. As you are probably aware there are other initiatives currently active to try to improve this situation, but all have a degree of complexity and are designed to overcome problems caused by Suppliers' lack of customer response.

The optimum solution to the above problem is for Suppliers to offer a service whereby their agent, ie usually their meter operator, can make an appointment to withdraw the cutout fuse and reterminate the customer's meter tails in a double pole disconnecter. The disconnecter would be paid for and owned by the customer, but provided and installed by the meter operator. This would then, at a stroke, resolve all such future issues for that customer. Clearly the customer should be exposed to a reasonable charge for undertaking this work. Part of the existing problem is that Suppliers do not publish their willingness to do this, and when pushed to do so reluctantly offer appointments, and not in our experience a two hour time banded appointment.

A variant on the above is for the meter operator to remove the fuse to allow the customer's electrician to complete some work for which de-energization is necessary and then re-energize. In some cases this could sensibly be during one visit, or in others would be two. But in these cases even two hour time banded appointments are probably not workable, and a more precise guaranteed time would be appropriate. However recognizing the logistical difficulties of this, we would promote the double pole disconnecter solution proposed above.

Both approaches need a strong regime to encourage Suppliers to make and keep appointments that facilitate customers' needs without incentivizing their electricians to circumvent health and safety law.

To be clear we are not advocating the above as the only means of providing a better service to customers; however it is only a reinforcement of the existing arrangements envisaged and created when the PESs were split back in 2000 and should be made to work as intended. We also note that because of the expected smart meter rollout, the labour force available to meter operators and Suppliers is set to grow, thus making such an approach even easier to promote and implement.

Yours sincerely,

Mike Kay
Networks Strategy and Technical Support Director