

Jonathan Blagrove,
Consumer Policy and Insight,
Ofgem.

22.08.2014

Dear Sir,

I wish to make a submission to the consultation on the Supplier Guaranteed and Overall Standards of Performance.

In the paragraph headed "Context" you state "*we committed to reviewing the GS and OS to ensure that they are still fit for purpose, reflect consumer needsIn line with this commitment, we have examined each of the existing GS and OS*" I submit that your review does not cover all of the existing Guaranteed Standards.

In relation to electricity supply GS4 refers to "Notice of planned interruptions" and states that customers must be given at least 2 days notice.

In the period May 6th to August 13th. 2014 approximately 20 houses, of which mine is one, have had "planned interruptions of electricity supply" for a nominal period of 8 hours on three separate occasions. The interruptions have not affected the local golf course, the Greenham control tower or the Greenham Common Trading Estate, i.e. no commercial concerns. Each time we were given some 5 – 7 days notice, thus fulfilling the conditions laid out in the Guaranteed Standards and not requiring the supply company to compensate their customers. I have contacted the energy company concerned to voice my feelings about this repeated failure to supply electricity, but I have been given no satisfactory explanation as to why this was necessary, it has, however, been made clear to me that in following the Guaranteed Standards the supply company was quite within their rights. I would submit that the provision under GS4 is totally inappropriate.

- 1) It could be argued that if it were necessary to interrupt supply to carry out essential maintenance once in five years it would be acceptable given that safety and security of supply are paramount. But three times in 4 months?
- 2) Two days notice, or even 7 days notice does not take into account the fact that people may have longstanding plans which require electricity. Even working from home is not possible without electricity and land line telephones are essential since mobile phone reception is extremely poor.
- 3) This is an area where we have no gas supply, thus no means of cooking or providing hot drinks, and the age and health status of their customers is not known by the energy company.
- 4) Under the current rules a company could, in theory, interrupt electricity supplies to a given customer/s once a week throughout the year, and provided the customer/s were given 2 days notice the electricity supplier would suffer no penalty. This is clearly ludicrous, but there is nothing in the Guaranteed Standards to stop this happening.

- 5) Customers have a contract with their supplier which entails paying for their electricity upfront; it would appear that suppliers have no responsibility to actually supply that electricity, even though we pay a standing charge.

I would submit that:

- a) Your review is not comprehensive since it does not cover GS4 (electricity).
- b) While a planned interruption of supply might be acceptable once in five years, I would suggest that a penalty should be imposed for any additional planned interruption during that period, with the charge increasing with each subsequent interruption. Where the interruption is nominally for a whole day period, the compensation should be sufficient to allow people to actually go out and have something to eat, rather than sit in a cold house without warm food.

Finally I would point out that if you were to question a random group of people about how often their electricity was subject to a planned interruption for an entire day, they would look very surprised and reply "never". How then do you wish to respond to my answer of "three times in 4 months?"

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NB Should it be required I can supply copies of all the notices of planned interruptions, dated 6.05.2014; 28.05.2014; 13.08.2014.