



Utility Customer Service Management Ltd.

Submission to Ofgem

Consultation on the Supplier Guaranteed and Overall Standards of Performance.

Chapter	Question	Question/Response
3	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?
		<i>No comment.</i>
	2	Do you 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?
		<i>No comment.</i>
	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?
		<i>Yes, it should be retained however, in our view the underlying spirit of this requirement does not appear to be supported by the regulator and as such, this has led to some suppliers believing it doesn't apply to them. Without clear commitment by the regulating body to these regulations, regulated bodies will simply ignore them.</i>
		<i>The Executive Summery details "The GS will continue as a useful way to set clear expectations for suppliers..." – an aspect we have found not to be upheld by the regulator.</i>
		<i>In terms of "core requirements", clarity can be provided but a common sense approach, if upheld by the regulator, should suffice. In our experience, suppliers "rule the roost" in this area at the experience of Customers and the underlying spirit of the regulations.</i>
	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?
		<i>No comment.</i>
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?	
	<i>In our view, unless the Customer has a competitive</i>	



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		<i>choice in this area (which he hasn't) then there is little justification for removing the standard.</i>
	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? <i>No comment</i>
	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? <i>No comment</i>
	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 <i>We are no privy to the logic which caused segmentation of the market such that regulations are selective and in the absence of this feel the principle of this stance is wrong. Based on this background, we remain confused at the logic of further selectivity of Customers who enjoy the benefit of regulations. We fail to understand why one Customer enjoys protection whilst another doesn't and can't relate to many other regulations in UK where this principle applies in a single market.</i>
	9	Are there any areas of the regulations where you think the obligations could be clarified? Please explain why. <i>Many. The regulations appear to be full of holes which at first sight are not apparent and yet, suppliers are able to identify very quickly and without the regulating body taking a stance regarding the spirit of the rules – suppliers are able to almost ignore them. We have had instances where suppliers have indicated the regulations don't apply to them even.</i>
	10	Do you agree that the definition of working hours should be aligned? If so, what should those working hours be? <i>No comment</i>
4	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? <i>Given that the payment levels are not compensation but recognition of failure then there is little justification for increasing the levels but justification for aligning them if only for simplicity. Reviews</i>



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		<i>should be set every five years in line with regulatory reviews and even more importantly, published and held as a key indicator of performance by the regulator.</i>
	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? <i>There is no justification for segmentation in this area.</i>
	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? <i>We feel suppliers given the opportunity will ignore these regulations whenever possible and as such, without clear commitment by the regulator to support the spirit of the regulations – any awareness is wasted effort.</i>
	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? <i>See answer to 13</i>

### General

With the underlying principle of allowing the market to develop and to only regulate where market forces cannot or should not apply, we feel there is perhaps scope for greater use of Guaranteed Standards e.g. responding to written queries, meter removals to allow demolition etc. but such standards will only ever be of value if their spirit is upheld by the regulator and vigorously applied as a substitute for market forces.