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Jonathan Blagrove
Ofgem
9 Millbank
London
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By email

23 January 2015

Dear Jonathan,

Statutory Consultation on Supplier Guaranteed and Overall Standards of Service

We write in response to Ofgem's Statutory Consultation issued on 16 December 2014.

Inclusion of Micro-Businesses within the Appointments standard

In line with the comments we provided in October in response to Ofgem's Draft Statutory Instrument, and those in our response to the August 2014 consultation, we remain of the view that the GS regime should not apply to micro business customers.

No evidence has been presented to justify the extension of the existing framework to gas Micro-Businesses and a proper assessment of costs and benefits should be carried out prior to introducing such a policy.

We therefore strongly urge Ofgem to carry out such an impact assessment, and to determine whether the benefits of this intervention to consumers justify the costs.

We accept that the current framework, where consumers can have different expectations in gas than in electricity does not make sense, but rather than extend the regime, and increase the costs to the industry, and ultimately to consumers, Ofgem should first establish that there is a genuine need to be addressed.

If the IA proves positive, we would also note that the implementation of this new policy in practice will not be straightforward and involves negotiation of contractual arrangements with third party providers, significant internal changes to suppliers' processes and systems, amendments to customer engagement and communication materials, agent retraining and changes to field technology.

Given this, and the fact that the industry is focussed on the implementation of Project Nexus in October 2015, we would respectfully suggest that a more realistic implementation date would be 1st January 2016.

Faulty Prepayment Meters

We would be grateful for clarification that this standard, as drafted, and the requirement to attend within 3/4 hours, relates to circumstances where a prepayment meter fault impacts the supply of energy to a customer's premises, causing a customer to be off supply.

Circumstances where it is suspected that the meter may be operating outside the margins of error, we would expect to be captured by Standard (5) Faulty Meters.

Should you have any questions or wish to discuss our response, I can be contacted on 07979 567686.

Yours sincerely,

Graham Wood
Regulatory Manager
British Gas