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Ecotricity Reference No:448
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Ecotricity Response to the Supplier Guaranteed and Overall Standards of Performance – Statutory consultation and proposals

Dear Jonathan Blagrove,

Ecotricity is an independent renewable energy generator and supplier with over 150,000 customer accounts and 71.5MWh generating capacity across the UK. We have always prided ourselves on our professional, transparent and personalised customer service that we offer. This service is consistently recognised by our customers and third party surveys. As mentioned in our August 2014 response concerning the Guaranteed Standards (GS), we support measures to improve transparency in the industry. This is beneficial both for customers and simplifies things for suppliers from an operational point of view.

Our response to the proposals are positive, any concerns we do have are for clarification as opposed to objection.

Fixing Faulty Prepayment Meters

We support Ofgem's proposal to align expectations for both gas and electricity customers. Similarly, we acknowledge and support the standardisation of appointment times for both fuels to three hours on a working day and four hours on a non-working day. This would successfully simplify the process, communication with customers and their expectations.

However, we do ask for clarification for what constitutes a supplier having '*commenced such work as appears necessary to ensure that, as soon as reasonably achievable... or is replaced by a new working prepayment meter*'.

Does this require an engineer to be at the property within the timeframe, or would the engineer travelling to the customer's premises within the 3 hours be satisfactory? Alternatively, would simply booking an appointment within 3 hours be sufficient?

Making and Keeping Appointments

As per the section on prepayment meters, we support the standardisation of appointment times to a four hour window. This is beneficial from a customer perspective and simplifies the process for suppliers. We support the additional flexibility being handed over to suppliers, thereby allowing suppliers to compete through improved customer service methodology. This is integral to rebuild trust in the energy industry.

Definition of working hours

We agree that the definition of working hours should be aligned and suggest that 8am until 8pm, Monday to Friday and 9am – 5pm on Saturdays are appropriate.

We suggest that Sundays and Bank holidays should be considered outside working hours and emergency contact only. Having a full service during "working hours" on these "Non-working days" would not be economical; particularly for smaller suppliers whose offices are closed on Sundays and bank holidays.

Guaranteed Standards payments

We accept that since the GS payment levels have not been reviewed since 2002, it is timely that they are now adjusted. We would like to make it clear, however, that these charges can add to the costs of small suppliers. Charges are passed back to meter operators where the fault for failed appointments and other breaches rests with them. However, suppliers do absorb some of these costs.

Furthermore, we consider that the payment levels for micro-businesses should be different to those of domestic customers as their potential for greater loss is higher. We believe that neither GS nor associated payments should apply to micro-businesses and a separate consultation entirely should consider performance standards and payments for this group of customers.

Conclusion

We support the review and standardisation of the Guaranteed Standards and believe that this will increase clarity for customers and increase deliverability and accountability on the part of suppliers. We also support the increase in flexibility with respect to appointments.

We would like clarification on the issue of what Ofgem would consider to meet the criteria of "having commenced work" in relation to fixing prepayment meter problems.

We believe that Sundays and Bank Holidays should be considered "non-working hours" and that suppliers' obligations on these days should be limited to handling emergencies.

Finally, we believe that micro-business customers should be treated under an entirely separate scheme to domestic customers and that this should be consulted on separately.

Ecotricity welcomes the opportunity to respond and hope you take our comments on board.

We also welcome any further contact in response to this submission. Please contact Ryan Wilkins on 01453 769392 or ryan.wilkins@ecotricity.co.uk.

Yours sincerely,



Emma Cook
Head of Regulation, Compliance & Projects.

