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By email only to [jonathan.blagrove@ofgem.gov.uk](mailto:jonathan.blagrove@ofgem.gov.uk)

Dear Jonathan

### **Supplier Guaranteed and Overall Standards of Performance - statutory consultation and proposals**

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. Our response is not confidential and can be published via the Ofgem website.

Although not directly affected by the majority of the changes proposed, we are pleased to see Ofgem are reviewing, and where appropriate, removing unnecessary obligations on the industry.

The specific changes in this consultation that will affect UK Power Networks are in respect of Regulation 11 – the requirement for a supplier to issue a statement to customers following receipt from a distributor of a request to issue a notice of electricity interruption standards.

We understand the move to this reactive, rather than blanket proactive approach, however the documentation issued is silent on the potential volumes or scope of such requests and whether such a move will actually simplify the process and result in cost savings.

The consultation itself refers to such requests from distributors applying to customers in areas where interruptions are most common, however the statutory instrument is silent on this specific point and a distributor could request the notices be issued to all its customers.

Furthermore, although there will be printing and distribution costs savings for suppliers the notices are sent to a smaller number of customers than present, additional costs are could potentially be incurred for any IT system changes or manual intervention required to send the notices to only those customers requested by distributors, rather than a blanket approach.

With the above in mind we seek clarity on two points:

- Whether the lack of a reference in the statutory instrument to the notices only being issued to a subset of customers where interruptions are most common was an oversight or whether this was intentional. If the latter than we would appreciate an understanding behind the reasons for this; and

- What distributors can do to help ensure the lists of customers who should receive a copy of the Notice of Rights are sent in a consistent format so as to simplify the process for suppliers issuing the data. For example
  - what data fields are required
  - is there a preferred time for the notices to be sent such that all distributors issue them at the same time

The consultation also proposes amendments in respect of Regulation 4 (appointments). It is clear from the consultation that this proposal and the consultations to date have only been made in respect of supplier appointments. We believe that the current arrangements for distributors (AM/PM/2 hour window) are fit for purpose and do not recognise any current driver for a consequential change to the distributor standard to match the proposed new supplier standard.

I hope the above provides you useful feedback. If you have any queries please do not hesitate to contact Paul Measday ([paul.measday@ukpowernetworks.co.uk](mailto:paul.measday@ukpowernetworks.co.uk)) in the first instance.

Yours sincerely



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