

Way Forward on the introduction of Supplier Guaranteed
Standards of Performance for Switching, and consultation on a
Statutory Instrument to bring them into force

Ofgem consultation

A Response by Utility Warehouse

This document sets out the views of Utility Warehouse regarding the Ofgem document '*Way Forward on the introduction of Supplier Guaranteed Standards of Performance for Switching, and consultation on a Statutory Instrument to bring them into force*' published by Ofgem on 23 November 2018.

Utility Warehouse is the UK's only fully integrated provider of a wide range of competitively priced utility services spanning both the Communications and Energy markets. Customers benefit from the convenience of a single monthly statement, consistently good value across all their utilities and exceptional levels of customer service. Utility Warehouse does not advertise, relying instead on 'word of mouth' recommendation by existing satisfied customers and distributors in order to grow its market share.

We take our responsibilities as an energy provider very seriously and make every effort to ensure we provide such essential services to our customers with the utmost integrity; the customer is at the heart of our business model and the way in which we operate. Customer value is the cornerstone of the success we have had and continue to achieve.

Utility Warehouse welcomes Ofgem's intent to improve switching performance and make switching more reliable.

We are pleased that Ofgem have recognised some of the concerns raised in the June consultation around the remaining Guaranteed Standards requiring suppliers to complete a switch within 21 days, issue final bills within six weeks of a switch and to ensure that customers are not erroneously switched, and will be undertaking further work with the industry to ensure these are better targeted at the party responsible for the event. We look forward to working with Ofgem to assist this process to ensure this delivers the best outcome for consumers, by incentivising the supplier responsible for the detriment caused to improve their performance.

Identification of Erroneous Transfers

We are disappointed that Ofgem have not addressed a concern we raised in our response to the Policy consultation in June 2018, regarding the ability to pay compensation to another Suppliers customer where we may have no name, bank details, billing address or contact details.

Regulation 6A requires the old supplier and new supplier to agree whether an ET has taken place within 20 working days of the customer notifying their chosen supplier.

Where an Erroneous Transfer has occurred because of an incorrect site being selected, a data entry error or an industry data error, it is likely the customer who has been erroneously transferred is not the customer that has entered into a contract with the new supplier.

The new supplier will therefore not know who they should be paying compensation to or how to contact them to make the payment unless they have been directly contacted by the old supplier's customer. The customer would need to provide consent for suppliers to pass these details to each other and there is currently no mechanism in place that would allow this.

As highlighted in our response to the June consultation, we do not believe Ofgem have appropriately considered the difficulty in administering a time sensitive payment in these circumstances and further work is needed to address this.

We request that Ofgem urgently address these issues ahead of formally introducing this Guaranteed Standard.

Delays in receiving data flows from the contacted supplier

As Regulation 6A is applicable to both the new supplier and the old supplier, they are both reliant on the contacted supplier to notify the other supplier that they believe an erroneous transfer has taken place.

When doing this the contacted supplier will send a data flow which will detail the 'Initial Customer Contact Date' which will inform the recipient which date they should use for this purpose.

The current drafting suggests that both suppliers will use this date for the purposes of calculating the period of time within which the individual standard of performance must be completed.

We are concerned that there could be instances where the contacted supplier doesn't send the data flow to the new supplier with enough time for them to reasonably respond, or after the time period has already elapsed.

We request clarification from Ofgem on the intent of this drafting. While we understand that the consumer detriment is relevant to the date of initial contact, we do not believe this regulation should penalise a supplier if the failure is not reasonably within their control.