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Jack Ambler
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By email to jack.ambler@ofgem.org.uk

5 June 2020

Dear Jack

Citizens Advice response to Ofgem consultation on the Proposal to modify the Regulatory Instructions and Guidance (RIGS) for RIIO-ED1

Citizens Advice welcomes the opportunity to respond to this consultation as part of its statutory role to represent domestic and small business energy consumers in Great Britain. Our response is not confidential and may be freely published.

We support the modifications noted within the consultation which should have the effect of increasing clarity regarding the information provided by the electricity Distribution Network Operators (DNOs) relating to Guaranteed Standards of Operation (GSOPs) and related information on interruptions.

We have the following point regarding the proposed modifications.

Patron HRH The Princess Royal **Chief Executive Dame Gillian Guy**

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Charity registration number 279057 VAT number 726 0202 76 Company limited by guarantee Registered number 1436945 England

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At paragraph 3.15, there is guidance that DNOs should contact a customer that has a smart meter outage alert as soon as reasonably practicable thereafter to see whether the customer does have a power outage. The guidance states that the contact should be made between the hours of 8am to 9pm but that DNOs can contact the customer outside of those hours if the DNO believes it to be in the customer's best interests to do so. The guidance does not provide more information as to the circumstances when it may be in the customer's best interests to be contacted by a DNO. We believe that it would be valuable to add specific guidance as to when the DNO should be contacting a customer during the 'out of hours' period. For instance, customers on the Priority Services Register would be an indicator for such contact, particularly those that may be in a high priority group, such as those people that may be medically dependent upon an electricity supply. We would recommend consultation with DNOs and other stakeholders to clarify this guidance further to ensure that the most 'at risk' customers are prioritised for contact during a potential outage indicated by a smart meter outage alert.

Yours sincerely

Caroline Farquhar

Senior Policy Researcher