



**Scottish & Southern**  
Electricity Networks



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Louise Deighan  
RIIO – Electricity Distribution  
Ofgem  
3<sup>rd</sup> Floor, Cornerstone  
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Glasgow  
G2 2BA

10 February 2017

Dear Louise,

### **Consultation on proposed changes to The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008**

Scottish and Southern Electricity Networks (SSEN) appreciate the opportunity to comment on the proposed changes to The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008 (the ‘Complaints Handling Standards’).

We support Ofgem’s proposal to remove the obligation on Distribution Network Operators (DNOs) to inform all consumers once a year of the existence of their complaints handling procedure and how to obtain a copy. We agree that the costs of writing to all customers on an annual basis outweigh the benefits. It is likely that a significant proportion of our customers will not read or retain mass communications of this type. Hence a regular written statement is unlikely to represent good value for our customers.

In making this amendment to the Complaints Handling Standards, we believe it would be prudent to also consider amending Regulation 22 (1)(a) and (b) of The Electricity (Standards of Performance) Regulations 2015 and Regulation 18 (a) and (b) of the Electricity (Connection Standards of Performance) Regulations 2015. Both are directed at electricity distributors and refer to the now out-dated process of electricity suppliers mailing customers on the distributors’ behalf.

However, we are mindful that the Distribution licence still mandates (under Standard Licence Conditions (SLC) 9 and 10) that we take all reasonable steps to inform customers at least once a year of the existence of relevant arrangements. Whilst SLC 10 is limited to Domestic Customers, SLC 9 extends to any customer. To this end, in January 2017 we directly mailed our customers, taking the opportunity to raise awareness of our new branding and the new national helpline (105), whilst meeting our regulatory requirements. These wider benefits will not be present every year.

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Ofgem's consultation helpfully indicates that 'all reasonable steps', as per SLCs 9 and 10, does not extend to writing to all customers. We agree that the proposals set out in Ofgem's letter (16 January 2017) provide a suitable balance between maximising coverage and avoiding high costs for little additional benefit and we will follow this advice in our annual cycle of informing customers.

However, whilst this clarity over appropriate communication methods / channels is welcomed, we would encourage Ofgem to amend the wording in SLCs 9 and 10 to reflect the position and expectation set out in its letter of 16 January 2017.

Should you require any clarification on any of the points raised please do not hesitate to contact me.

Yours sincerely,

Gillian Hilton  
Networks Regulation