



Utility Customer Service Management Ltd.

Submission to Ofgem
July 2017

Standards of Conduct for suppliers in the retail energy market.

1. In general terms, we are in support of “Principle” based regulation however, we remain concerned in the following areas:
 - a. As trust levels in Customers towards suppliers is generally low, we feel clear examples could be developed and circulated which demonstrates Ofgem’s interpretation of how the changes work in practise as a means of raising Customer confidence.
 - b. One such example could well be reference to timeliness. To illustrate this let us consider a Customer trying to progress an issue with a supplier and after multiple efforts to make contact continues to receive no substantive response and then after some time the supplier response. A focus on outcomes would suggest this is satisfactory as the supplier did indeed respond but from a Customers perspective, this has been a laborious process albeit the final outcome is the same as if the supplier responded substantively initially. This change should suggest to suppliers that this type of behaviour is not acceptable.
 - c. We are concerned that the trend towards principle based regulation will dilute some of the prescriptive regulations in place at the moment and in particular, guaranteed standards. We feel Ofgem should declare their stance on the ongoing commitment to uphold these standards.