

Steve Kirkwood
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Ofgem
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20-12-2024

Dear Steve,

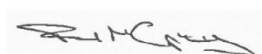
Thank you for the opportunity to respond to the Consumer Standards - Supplier 24-7 Metering Support statutory consultation. As you are aware Energy Networks Association (ENA) is the industry body representing the UK's electricity transmission and distribution network operators (DNOs). This response sets out a collective view from ENA members. Some ENA member companies may additionally respond individually to the consultation.

We agree with Ofgem's proposal to activate supplier SLC 31G.3A(c). This has been an area of ambiguity for some time and needs clear responsibilities established. The license conditions should be more explicit on what service media should be. For example, phone only, having heard suppliers concerns over different channels. The costs to deliver the solution are between Ofgem and suppliers to determine as to whether it falls within the cap but regardless these solutions need to be enduring.

The reluctance displayed by some suppliers in transitioning to a 24/7/365 service approach is disheartening and contributes to the erosion of consumer standards in the industry. It is in the interest of fair service for consumers to provide this service. Customers should be able to expect a uniform response across the sector to address a loss of electricity or gas. We are pleased that Ofgem is proposing to require suppliers to be open 24/7 for customers who have lost power or gas due to issues related to their metering.

We note that the new obligations will not take effect until April 2025, i.e. after this winter and there are reasons quoted for this. We believe that Ofgem should encourage suppliers to implement their solutions as soon as possible to ensure their customers get the best service possible through the winter period.

In paragraph 3.14 of the consultation Ofgem recognises that this licence condition should not be seen as a one-stop solution to preventing unnecessary calls to DNOs' emergency lines as customers may not know the underlying cause for being off-supply. We agree with that statement and DNOs will continue to support customers who have rung them in error, providing them with support and advice and directing them to their supplier when it is a metering fault. It is with this onward direction of customer calls in mind that we see a need for coordination amongst suppliers to produce and maintain a single supplier contact list for 24/7 metering support which all DNOs can refer to when speaking to customers with metering faults. This will ensure that DNOs are providing customers with the correct details.

A handwritten signature in black ink, appearing to read 'Paul McGimpsey', is shown above the name and title.

Paul McGimpsey
Director of Markets and Regulation