

# Consultation

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## Consumer Standards – 24/7 Metering Support Statutory Consultation

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Contact:	Jemma Baker
Team:	Domestic Retail Policy Team
Email:	<a href="mailto:FutureConsumers@ofgem.gov.uk">FutureConsumers@ofgem.gov.uk</a>

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We are consulting on activating a currently dormant supplier licence condition that would require all domestic suppliers' enquiry services to be available 24/7 for customers with an interruption in their supply of electricity or gas due to meter faults. We particularly welcome responses from consumer groups, charities, suppliers and network operators. We would also welcome responses from other stakeholders and the public.

This document outlines the scope, purpose and questions of the consultation and how you can get involved. Once the consultation is closed, we will consider all responses. We want to be transparent in our consultations. We will publish the non-confidential responses we receive alongside a decision on next steps on our website at [ofgem.gov.uk/consultations](https://www.ofgem.gov.uk/consultations). If you want your response – in whole or in part – to be considered confidential, please tell us in your response and explain why. Please clearly mark the parts of your response that you consider to be confidential, and if possible, put the confidential material in separate appendices to your response.

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## **Consultation** – Consumer Standards – 24/7 Metering Support Statutory Consultation

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## **Executive Summary**

### **24/7 Support for Customers Off-supply due to Meter Faults**

#### **What is the issue?**

Domestic customers can experience an interruption in their supply of power or gas due to a meter fault which is outside of their suppliers' regular contact hours. Many customers are unable to report the fault and receive assistance or advice from their suppliers until the next working day, in the best-case scenario.

This is leading to poor customer outcomes and has the potential to cause significant customer harm, especially if that customer is already in a vulnerable circumstance prior to being off-supply. The inability to inform their supplier of the meter faults outside of regular hours can delay restoration of supply and can leave customers unable to receive appropriate advice and assistance from the supplier in the meantime. This harm is increased where suppliers are uncontactable over weekends and/or bank holidays.

Suppliers' unavailability is also putting additional and unnecessary pressure on network operators' emergency phonelines as customers may resort to seeking resolution through networks, despite networks not having responsibility for the suppliers' meters. This could have impacts on the ability of network operators to respond to emergency situations in a timely manner, indirectly causing further consumer harm.

#### **What are we proposing to do?**

As part of our Consumer Standards decision in October 2023, we introduced a package of measures to help improve the ease of customers contacting their supplier. This included a licence condition (31G.3A(c)) which would require suppliers' enquiry services to be available 24/7 for customers off-supply due to meter faults to provide immediate assistance, guidance or advice.

Some suppliers challenged this proposal on the basis that it might have resulted in a costly implementation compared to an industry-led solution, which was suggested could streamline costs whilst also delivering a joined-up solution for customers. Therefore, this condition was introduced as dormant to allow time for industry to develop this solution.

There has been insufficient progress by industry parties in developing this solution since our decision in October 2023 and the issue for consumers remains unresolved. Following a full assessment of new costs data we requested from suppliers we are now consulting on activating the dormant licence condition to address the poor outcomes that consumers who are off-supply due to a meter fault outside of regular contact hours continue to experience.

### **What will this mean in practice?**

As with the other Contact Ease licence conditions introduced as part of our Consumer Standards decision in October 2023, the currently dormant licence condition would not prescribe the exact manner of how suppliers provide this service for their customers.

Instead, suppliers must have regard to the Contact Ease guidance document which we are also proposing to update. This guidance document sets out the consumer outcomes we expect suppliers to deliver to meet the requirements of the condition, and suppliers must be able to demonstrate to us how they are doing so.

The outcomes that we would expect suppliers' enquiry service to deliver for customers include:

- The customer understands which organisation to contact and how, and that the relevant contact information is clear and easy to find.
- The supplier is available to receive enquiries from customers off-supply due to meter faults, to triage what might be causing the interruption in supply and determine if it is urgent. We would expect the supplier to offer assistance, guidance or advice to resolve the issue at the time of the enquiry where this is possible, or at the earliest opportunity.
- The customer's supply is restored as soon as possible in line with any existing obligations and standards, and the customer is advised of the supplier's process to investigate and fix any meter fault, including an estimated timeline for the issue to be investigated or resolved if it is in the supplier's control.
- The supplier to consider whether a customer requires further assistance, in line with existing licence obligations, especially if that customer is in a vulnerable circumstance.

There may be different approaches that suppliers can take to meet these expected outcomes based on their business model and needs of their customers. When taking into account other licence conditions that set requirements for suppliers' enquiry services, it may be likely that providing a 24/7 phonenumber is the optimal approach in practice. However, it is for suppliers to demonstrate to us that their enquiry service can deliver the expected customer outcomes set out in the associated guidance, whichever approach is taken.

In response to our previous consultations, some stakeholders suggested that a centralised service developed between industry parties could be more efficient. We think that from a customer perspective it could be easier to have a unique point of contact if they experience an interruption in supply because they are unlikely to know the reason why they are off supply. We remain open to an industry-led solution being developed between relevant parties and we consider that activating the licence condition would not

prevent suppliers and network operators to deliver an industry-wide approach, if that can be agreed between the parties and still deliver the expected outcomes for customers.

We do not expect customers to know what has caused them to go off-supply, and the messaging around the 24/7 contact service will need to ensure that responses to potential emergencies are not delayed. However, in situations where it has been determined that the interruption in supply is due to a meter fault, it is important that suppliers are available as they are best placed to provide the assistance and guidance for their customers.

Alongside this consultation we have published a draft Impact Assessment that sets out estimated costs for implementing this change and the benefits for consumers. We welcome input from consumers, consumer organisations and interested industry parties on the proposal in this consultation as well as the accompanying draft Impact Assessment.

## **1. Introduction**

### **What are we consulting on**

- 1.1 The purpose of this consultation is to put forward our proposal to activate the currently dormant supplier Standard Licence Condition (SLC) 31G.3A(c), in both electricity and gas supply licences. We are also proposing to update the Contact Ease Guidance document, to which suppliers must have regard under SLC 31G.3E and in their compliance with associated licence conditions.
- 1.2 If we decide to activate SLC 31G.3A(c) following this consultation, we are proposing that the change takes effect from April 2025.

### **Chapter 2: Background to Metering Support**

- 1.3 We provide an overview of the work undertaken to date and the timeline as to how we have reached our current proposal.
- 1.4 This chapter sets out the development of the consultation from the 2023 Consumer Standards work, the original consultation on the proposal in 2023 and the work completed since then to inform this statutory consultation.

### **Chapter 3: Rationale for Activating Dormant Licence Condition**

- 1.5 This chapter details our rationale for proposing activation of the dormant condition, building on previous work that resulted in the Consumer Standards decision in October 2023.
- 1.6 The rationale for activating the condition establishes that a customer off supply due to a meter fault which falls outside of their supplier's contact hours, will lead to poor customer outcomes and potentially significant customer harm, particularly in cases of pre-existing vulnerability.
- 1.7 Our reasoning for activating the licence condition is supported by an assessment of data received from a recent request for information (RFI) to domestic suppliers, which indicates that the majority of domestic customers appear to already have suppliers that are compliant with the licence condition and that the costs of activating SLC 31G.3A(c) would be relatively low.
- 1.8 Finally, we set out the consumer outcomes that we expect to be delivered by suppliers in complying with the licence condition.

### **Chapter 4: Process to Activate Dormant Licence Condition**

- 1.9 In this chapter we set out the process to activate the dormant licence condition. The feedback provided by suppliers on the time required to make necessary



changes to be compliant with the licence condition, is acknowledged and addressed in our proposal.

- 1.10 The drafting of the dormant SLC 31G.3A(c) currently states that it will not take effect until after further consultation, and with at two months' notice from Ofgem. This consultation proposes to activate the condition while at the same time removing this qualifying text from the licence to ensure clarity for licensees and stakeholders.
- 1.11 This chapter will also provide a high-level overview of our draft Impact Assessment, published alongside this consultation document, that sets our assessment of the costs and benefits of activating the dormant licence condition.

### **Chapter 5: Update to Contact Ease Guidance**

- 1.12 This chapter details our proposal to update the Contact Ease Guidance to include an additional section setting out our expectations for suppliers to meet the requirements of SLC 31G.3A(c). This stems from our October 2023 Decision where we published the Contact Ease guidance document.
- 1.13 We also summarise the changes made and the reasoning for doing so, which relate to clarity of intent, interaction with other contact ease licence conditions, practical implications for suppliers and expected consumer outcomes.

### **Context and related publications**

- 1.14 Currently when a customer is without power or gas due to a meter fault, they are potentially unable to report the issue to their supplier when it occurs, if it is not within their suppliers' opening hours. The proposal put forward in this consultation to activate SLC 31G.3A(c) is aimed at addressing this issue and is supported by data received from RFIs to all domestic suppliers in addition to gas and electricity distribution network operators.
- 1.15 The development of this policy began in 2023 with the Consumer Standard workstream whereby options relating to expanding suppliers' enquiry services to be contactable 24/7 by their customers was considered. As the result of feedback received at consultations, we revised this proposal to be targeted at customers who were off supply due to meter faults.
- 1.16 In our October 2023 decision, the new licence condition was refined to relate just to customers off-supply due to meter faults and was introduced into the licence as dormant, in order to give more time for parties to develop an industry-led solution which would deliver a more efficient and coordinated outcome for consumers. However, given lack of industry agreement on such a

solution, and with support of data received from RFIs, we are now proposing to activate SLC 31G.3A(c) in both electricity and gas licences.

1.17 Related publications:

- Ofgem’s May 2023 Consultation on a framework for consumer standards and policy options to address priority customer service issues:  
[www.ofgem.gov.uk/consultation/consultation-framework-consumer-standards-and-policy-options-address-priority-customer-service-issues](http://www.ofgem.gov.uk/consultation/consultation-framework-consumer-standards-and-policy-options-address-priority-customer-service-issues)
- Ofgem’s July 2023 Consumer Standards Statutory Consultation:  
[www.ofgem.gov.uk/consultation/consumer-standards-statutory-consultation](http://www.ofgem.gov.uk/consultation/consumer-standards-statutory-consultation)
- Ofgem’s October 2023 Consumer Standards Decision:  
[www.ofgem.gov.uk/decision/consumer-standards-decision](http://www.ofgem.gov.uk/decision/consumer-standards-decision)
- Ofgem’s Forward Work Programme 2024/25:  
[www.ofgem.gov.uk/decision/decision-consultation-ofgems-forward-work-programme-202425](http://www.ofgem.gov.uk/decision/decision-consultation-ofgems-forward-work-programme-202425)

### **Consultation stages**

1.18 The consultation will be open until 20/12/2024. Responses will be reviewed, and we currently intend for the consultation decision to be published in early 2025 subject to the responses received.

### **How to respond**

1.19 We want to hear from anyone interested in this consultation. Please send your response to [FutureConsumers@ofgem.gov.uk](mailto:FutureConsumers@ofgem.gov.uk).

1.20 We’ve asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

1.21 We will publish non-confidential responses on our website at [www.ofgem.gov.uk/consultations](http://www.ofgem.gov.uk/consultations).

### **Your response, your data and confidentiality**

1.22 You can ask us to keep your response, or parts of your response, confidential. We’ll respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

- 1.23 If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we'll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.
- 1.24 If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the UK's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 3 of this document.
- 1.25 If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

### **General feedback**

- 1.26 We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:
1. Do you have any comments about the overall process of this consultation?
  2. Do you have any comments about its tone and content?
  3. Was it easy to read and understand? Or could it have been better written?
  4. Were its conclusions balanced?
  5. Did it make reasoned recommendations for improvement?
  6. Any further comments?

Please send any general feedback comments to [stakeholders@ofgem.gov.uk](mailto:stakeholders@ofgem.gov.uk)

### **How to track the progress of the consultation**

You can track the progress of a consultation from upcoming to decision status using the 'notify me' function on a consultation page when published on our website. Choose the notify me button and enter your email address into the pop-up window and submit.

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Would you like to be kept up to date with *Consultation* name will appear here? subscribe to notifications:

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Once subscribed to the notifications for a particular consultation, you will receive an email to notify you when it has changed status. Our consultation stages are:

**Upcoming** > **Open** > **Closed** (awaiting decision) > **Closed** (with decision)

## 2. Background to 24/7 Metering Support

### Section summary

Our proposal to activate the dormant licence condition requiring domestic suppliers' enquiry services to be available 24/7 for customers off-supply due to meter faults is a continuation of our Consumer Standards work in 2023. This section sets out how the proposal was originally consulted on in 2023, and the work we have done since then to inform this consultation.

### Previous Work on Off-supply Support

#### Consumer Standards Workstream in 2023

- 2.1 Currently, when a customer is without power or gas due to a meter fault, they are potentially unable to report the issue to their responsible supplier when it occurs if it is not within their suppliers' opening hours.
- 2.2 As part of our previous Consumer Standard workstream in 2023, we had considered options relating to expanding suppliers' enquiry services to be contactable 24/7 by their customers.
- 2.3 In our May 2023 policy consultation, we had initially proposed a 24/7 enquiry service for all customers. However, based on feedback received from stakeholders we revised this proposal to be targeted at customers who were off-supply due to issues within suppliers' responsibility.
- 2.4 The majority of respondents to the original proposal indicated that there was insufficient evidence of a need for a universal 24/7 enquiry service to justify the potentially significant costs of implementation. This included consumers that had participated in qualitative research to inform our Consumer Standards workstream.
- 2.5 A revised proposal was consulted on in our July 2023 Consumer Standards Statutory Consultation, whereby all domestic suppliers would be required to provide, or procure the provision of an enquiry service that is available 24 hours every day "to receive enquiries from, and offer assistance, guidance or advice to Domestic Customers who are experiencing an interruption in supply of electricity/gas in circumstances where the interruption in supply is such that it is the licensee's responsibility to resolve it".
- 2.6 Following feedback from stakeholders about clarifying the intent behind the requirement, we further targeted the condition specifically at meter faults causing interruptions in supply, rather than just any issue that is the supplier's

- responsibility to resolve. This was to ensure that it was clear exactly which scenarios we considered would necessitate 24/7 contact with suppliers for guidance or advice, rather than the previous broader licence condition drafting.
- 2.7 We set out our rationale for introducing this refined SLC as dormant in our October 2023 decision. This decision was a result of feedback received from some suppliers that raised concerns that the requirement would be overly costly, although insufficient data was provided at the time to allow a full assessment. Some suppliers also considered that requiring an out-of-hours enquiry service for customers off-supply due to any issue within suppliers' responsibility would be an inefficient approach if it resulted in each supplier providing an individual enquiry service and would not deliver the best consumer experience.
- 2.8 Based on this feedback, our decision to introduce the licence condition as dormant was intended to provide industry parties more time to develop an industry-led solution that some suppliers had suggested could deliver a more efficient outcome for consumers.
- 2.9 We recognised the fact that a consumer may not generally know the reasons why they are off-supply and whether this would be an issue for their supplier or network operators. This led us to facilitate discussions between suppliers and network operators so that an industry solution could be found in the interest of consumers. However, whilst we remain open to a centralised industry-led solution to address issues consumers face when they are off-supply out of hours, there has been insufficient progress on its development to date and the risk of consumer harm continues to be unaddressed.
- 2.10 Given the lack of an industry agreement, in addition to our assessment of new costs data we requested from suppliers, we are now consulting on activating this licence condition, SLC 31G.3A(c) in both the electricity and gas supply licences, with no further changes being proposed.

### **Work Following 2023 Decision**

- 2.11 Since our 2023 decision, industry parties have been unable to agree an industry-wide solution for the risk of consumer harm identified in a timely manner. We are disappointed that sufficient progress has not been made on an industry-led solution to address the poor outcomes experienced by consumers off-supply due to meter faults outside of working hours, particularly those in vulnerable circumstances.

- 2.12 Therefore, in our Forward Work Programme 2024/25,<sup>1</sup> we highlighted our intention to consult further on activating the licence condition.
- 2.13 In June 2024 we issued requests for information (RFIs) to all domestic suppliers, as well as gas and electricity distribution network operators, to inform our considerations.
- 2.14 The purpose of these RFIs was twofold: 1) to gather data on the costs of activating the dormant condition and; 2) to seek data on the prevalence of the issue impacting network operators and those suppliers that already have 24/7 emergency enquiry services for meter faults.
- 2.15 We wanted to better understand suppliers' costs of activating the dormant licence condition to address previously raised concerns that such a requirement would be too costly to implement, especially when compared to a centralised solution between all suppliers and network operators.
- 2.16 To do this, we collected implementation (one-off) and ongoing costs data from those suppliers that consider themselves to already be compliant with the dormant licence condition, and estimated implementation and ongoing costs from those suppliers that considered that they would not currently be compliant if it was active.
- 2.17 The data received from these RFIs has informed our proposal to activate the dormant supplier SLC 31G.3A(c) and has been assessed as part of our draft Impact Assessment that we have published alongside this consultation.

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<sup>1</sup> [Decision for: Consultation of Ofgem's Forward Work Programme for 2024/25 | Ofgem](#)

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### 3. Rationale for Activating Dormant Licence Condition

#### Section summary

This section details our rationale for proposing activation of the dormant condition, building on our work undertaken previously that culminated in our Consumer Standards decision in October 2023. We also set out the consumer outcomes that we expect to be delivered by suppliers in complying with the licence condition.

#### Protecting Customers Off-supply due to Meter Faults

##### Rationale for Activation

- 3.1 As we had previously stated in our October 2023 decision, we continue to consider that it is critical for customers without supply due to meter issues to be able to receive appropriate guidance and support from their supplier at all times.
- 3.2 Currently, however, where a customer is off-supply due to a meter fault outside of their supplier's regular contact hours (such as overnight or on weekends) many customers are unable to report the fault or receive any assistance until the next working day (which can be longer than one day in the case of weekends and bank holidays).
- 3.3 This is leading to poor customer outcomes, and has the potential to cause significant customer harm, especially if that customer is already in a vulnerable circumstance prior to being off-supply.
- 3.4 We remain particularly concerned that customers off-supply due to a meter fault can find themselves unable to even report the meter fault to their supplier, delaying any response from the supplier to fix the fault either remotely (where possible), or scheduling an engineer visit.
- 3.5 This has the potential to see customers, including customers already in vulnerable circumstances, to be without power or gas for a significant period of time without any assistance, guidance or advice being provided by the supplier that is ultimately responsible for that meter. For example, there could be significant risk of harm to consumers that are medically dependent upon electricity and have their supply interrupted due to a meter fault. Faster restoration of supply or simply providing assistance, guidance and advice to customers who are off-supply is expected to reduce the risk of harm through injury and fatality.
- 3.6 Responses to our RFI indicate that some suppliers consider themselves to already be compliant with the dormant licence condition. As a result, it appears



- that the majority of domestic customers could already be with suppliers that are contactable outside of regular working hours should they be off-supply due to meter faults.
- 3.7 This could currently result in the outcomes that we want these consumers to experience to be dependent upon the supplier the consumer has a contract with. We do not consider that this is in the best interests of consumers as a whole and are therefore proposing to activate the dormant licence condition to ensure all consumers, no matter the supplier they are with, have a route to receive advice and support on a 24/7 basis when they are off-supply due to meter faults.
- 3.8 Activating the dormant condition would ensure that all domestic customers can expect to receive the same minimum level of service should they be off-supply due to metering faults outside of their suppliers' regular office hours. This could decrease the time it takes for the issue to be resolved or provide reassurance and guidance in a timelier manner for a consumer experiencing an emergency situation.
- 3.9 Based on data received from domestic suppliers and network operators in response to RFIs issued in June 2024, we have also calculated an estimated annual number of relevant out-of-hours meter fault enquiries of 83,204. This is based on using 20:00 to 08:00 as the out-of-hours timeframe.
- 3.10 Our analysis of the data received shows that the costs of activating the dormant licence condition would also be relatively low. Estimated market-wide one-off implementation costs would be c.£1.05m-£1.50m (£0.03-£0.05 per household), with additional ongoing costs of c.£6.41m-£9.03m annually (£0.20-£0.28 per household), not including any illustrative benefits that we have monetised. Details of the full assessment of the data received, including the estimated scale of the issue, can be found in the draft Impact Assessment published alongside this consultation.
- 3.11 The draft Impact Assessment also explores the benefits for consumers that have been identified (both monetised and non-monetised). This includes the illustrative monetised benefits associated with faster restoration of supply by being able to report meter faults that are interrupting supply at all hours, which also reduces the risk of harm from being off-supply.
- 3.12 In addition to the direct impacts on consumers, we consider that activating the licence condition would have secondary positive impacts on the existing emergency contact lines of network operators for both electricity and gas. Currently, those consumers not served by a supplier with a contact option out-

of-hours are only able to contact the networks' services, even though the network is not responsible for the meter fault and, in many cases, unable to provide the assistance or guidance required by the consumer.

- 3.13 This may result in additional, unnecessary pressure on those emergency contact services and lead to inefficient outcomes for consumers actually experiencing emergency issues that are the responsibility of networks to investigate and resolve, rather than suppliers.
- 3.14 However, we do recognise that if this licence condition is activated, that it should not be seen as a one-stop solution to preventing unnecessary calls to networks' emergency lines. Consumers themselves may not know, and are not expected to know, the underlying cause for being off-supply.
- 3.15 All industry parties have a role to play in cooperating to ensure the best possible experience for consumers. This is why our activation of the licence condition would not prohibit a centralised, industry-led solution to meeting the expected consumer outcomes outlined in the next section.
- 3.16 We also do not want unnecessary confusion to be created for consumers in potential emergency situations on which industry party to contact, where any delay to reporting an emergency could be detrimental.
- 3.17 However, this potential risk only relates to how the enquiry services are communicated to customers and is already present with the regular hours services offered by suppliers and network companies, as well as those suppliers already operating out-of-hours enquiry services.
- 3.18 We would, therefore, expect clarity in communication from industry parties so consumers can easily understand who to contact in which situations. This is expanded in chapter 5 of this consultation where it is reflected in our draft updated guidance.

### **Expected Consumer Outcomes**

- 3.19 In line with our intended future approach to regulation outlined in the recent Consumer Confidence publication,<sup>2</sup> this proposal sees a principles-based requirement on suppliers being accompanied by clear consumer outcomes that suppliers must demonstrate that they are meeting.

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<sup>2</sup> [Consumer confidence: a step up in standards | Ofgem](#)

- 3.20 The underlying rationale of improving the contact ease for domestic customers by activating the dormant licence condition remains the same as when we first introduced it, as do the expected consumer outcomes.
- 3.21 For additional clarity, we have set out these expectations in the associated Contact Ease guidance document, to which suppliers must have regard. The outcomes that we would expect suppliers' enquiry service to deliver for customers include:
- The customer understands which organisation to contact and how, and that the relevant contact information is clear and easy to find.
  - The supplier is available to receive enquiries from customers off-supply due to meter faults, to triage what might be causing the interruption in supply and determine if it is urgent. We would expect the supplier to offer assistance, guidance or advice to resolve the issue at the time of the enquiry where this is possible, or at the earliest opportunity.
  - The customer's supply is restored as soon as possible in line with any existing obligations and standards, and the customer is advised of the supplier's process to investigate and fix any meter fault, including an estimated timeline for the issue to be investigated or resolved if it is in the supplier's control.
  - The supplier to consider whether a customer requires further assistance, in line with existing licence obligations, especially if that customer is in a vulnerable circumstance.
- 3.22 More information on our proposed updates to the Contact Ease guidance document, including our intention behind these expected outcomes, can be found in Chapter 5 of this consultation.
- 3.23 The drafting of the dormant licence condition does not directly add additional obligations on suppliers to take action to fix the meter fault out-of-hours, nor are we seeking to make this an explicit expectation in the associated guidance. As a result, the speed at which a meter issue is resolved may still be different for customers reporting the fault out-of-hours, compared to those customers reporting the fault within regular working hours.
- 3.24 However, we want to ensure across all of our programmes of work that all consumers – regardless of their circumstances – experience the overall level of service they are entitled to expect, as we have recently set out in our Consumer

Confidence publication.<sup>3</sup> We have committed to develop a cohesive outcomes framework to define the consumer outcomes we expect suppliers to deliver and drive improvement in the standards of service received across the market.

- 3.25 We also recognise that consumers in the most vulnerable circumstances may have more acute or specific needs that suppliers should seek to identify, understand and provide those consumers with appropriate support. Driving improvement in customer service for these consumers is a proposed key theme of our refreshed Consumer Vulnerability Strategy<sup>4</sup> and suppliers should remain mindful of their existing obligations to identify and support consumers in vulnerable circumstances and identify whether specific interventions might be needed.
- 3.26 Therefore, we intend to keep this issue under review and may consider targeted actions in the future if we consider that consumers are, or are at risk of, suffering significant detriment due to suppliers not being explicitly required to take immediate action to resolve all meter faults out-of-hours. This could include specifying further consumer outcomes that should be achieved by suppliers, new licence conditions, or additional financial or reputational incentives to improve outcomes.
- 3.27 For example, Ofgem’s recent Consumer Confidence publication set out our intention to undertake a wider review of the Guaranteed Standards of Performance (GSOP) framework. Currently, the GSOP requires suppliers to investigate and/or fix meter faults within certain timeframes, but these timeframes begin within working hours. We may consider through this review whether these timeframes could be amended to speed up meter fault resolution when it occurs outside of the working hours stated in the regulations.

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<sup>3</sup> [Consumer confidence: a step up in standards | Ofgem](#)

<sup>4</sup> [Refreshing our Consumer Vulnerability Strategy | Ofgem](#)

## 4. Process to Activate Dormant Licence Condition

### Section summary

The drafting of the dormant SLC 31G.3A(c) currently states that it will not take effect until after further consultation, and with at least two months' notice from Ofgem. We are proposing to activate the condition at the same time as removing this qualifying text from the licence to ensure clarity for licensees and stakeholders.

In this section we also set out the high-level overview of our draft Impact Assessment, published alongside this consultation document, and explain our proposal for the 24/7 metering support requirement to take effect from April 2025.

### Questions

- Q1. Do you agree with our proposal to activate supplier SLC 31G.3A(c) in order to meet our desired outcome for consumers?
- Q2. Are there any further issues with implementation that we have not considered in this consultation? Please provide any relevant information to evidence the issues.
- Q3. Do you have any comments on the draft Impact Assessment published alongside this document, including the costs and benefits, competition impacts, and unintended consequences?

## Implementation Proposal

### Activation of SLC 31G.3A(c)

- 4.1 Currently, the standard licence condition (SLC) requiring domestic suppliers' enquiry services to be available 24/7 for customers off-supply due to meter faults is dormant.
- 4.2 This was achieved in the licence by stipulating as part of the SLC that the specific paragraph will only take effect following consultation and after Ofgem has given licensees at least two months' notice.
- 4.3 As set out in the Statutory Notice published alongside this consultation document, we are proposing to remove this stipulation from the licence and activate the currently dormant SLC 31G.3A(c).
- 4.4 Our Decision following this consultation, if we do decide to progress following consultation, will be the Notice required under the current SLC for it to take effect. We are also proposing to modify the licence, by removing the text from 31G.3A(c) that stipulates it will not take effect until Ofgem gives at least two months' notice, to ensure clarity for current and future licensees.

- 4.5 The full details of the proposed modification to both the electricity and gas supply licences are provided in the Statutory Notices published alongside this consultation and sent to all licensees and relevant stakeholders. The proposed licence modification can also be found in Appendix 1 of this consultation document.
- 4.6 Through this consultation we are also proposing to update the Contact Ease guidance document, to which suppliers must have regard under SLC 31G.3E in their compliance with associated licence conditions.
- 4.7 We provide further details in Chapter 5 of this document on our proposed guidance changes.

### **Proposed Implementation Timings**

- 4.8 A range of suppliers responded to our July 2023 Statutory Consultation proposals with significant concerns regarding our intention, at the time, to implement the 24/7 metering support condition with 56 days' notice.
- 4.9 These concerns centred around the operational changes that would need to be made to ensure that their enquiry services were compliant with the requirement to be available 24/7 for customers off-supply due to meter faults. This included putting in place the necessary staffing resources, such as hiring or training appropriately, as well as contract renegotiations. Where suppliers use third-party services to provide their enquiry service, sufficient time would also be needed to make the necessary commercial changes.
- 4.10 Some suppliers also noted required system changes that would need to be deployed following a decision and prior to the condition taking effect, such as changes to the interactive voice response (IVR) menus.
- 4.11 As a result of the feedback previously received on this 24/7 contact requirement, we are proposing that if we decide to activate SLC 31G.3A(c) following this consultation, it could take effect from **April 2025**.
- 4.12 We strongly encourage suppliers to provide us with evidenced feedback through this consultation if there are any further implementation issues that may delay successful implementation of the 24/7 enquiry service for customers off-supply due to meter faults.

### **Impact Assessment**

#### *Impact Assessment notice under s5A Utilities Act 2000*

- 4.13 Section 5A of the Utilities Act 2000 ("the Act") requires that before implementing a proposal that is important, we need to either carry out and

publish an assessment of the likely impact of implementing the proposal (“a section 5A IA”) or publish a statement explaining why we consider such an assessment is not necessary.

- 4.14 Our guidance on impact assessments sets out the reasons why a proposal may be considered to be important for the purpose of section 5A.<sup>5</sup> In line with that guidance, in order for a proposal to be considered important it needs to have a significant impact on suppliers. We consider that the consumer standards framework proposals and policy options to address priority customer service issues do not meet the definition of ‘important’ as set out in section 5A or our guidance.
- 4.15 As such, we do not consider it is necessary to carry out a section 5A IA as the costs information provided to us by suppliers indicate that the costs per customer per annum to suppliers would not amount to significant costs for the market. These costs implications diminish further and are even less significant as some suppliers already meet the obligations we propose to activate.
- 4.16 However, even though we do not deem these proposals as important proposals for the purpose of section 5A of the Act, nevertheless, we have carried out an assessment of the proposed activation of supplier SLC 31G.3A(c) to ensure relevant evidence is provided and the benefits and estimated costs of the policies are outlined.
- 4.17 Full details can be found in the draft Impact Assessment published alongside this consultation document. We have summarised the benefits and costs, as well as impact on competition below.

#### Summary of Benefits and Costs

- 4.18 Estimated market-wide one-off implementation costs would be c.£1.05m-£1.50m (£0.03-£0.05 per household), with additional ongoing costs of c.£6.41m-£9.03m annually (£0.20-£0.28 per household).
- 4.19 We do not know with confidence what impact a 24/7 enquiry service will have on average customer restoration times and so we present illustrative monetised benefits for a feasible range of average reduction times: between 1 and 7 hours. We estimate that the total monetised benefit from faster restoration of supply per year could range between £0.15m and £1.08m depending on the average reduction in time off-supply.

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<sup>5</sup> [Impact Assessment Guidance | Ofgem](#)

- 4.20 However, as discussed in in chapter 3 of this document, there are non-monetised benefits that could accrue to customers, including customers in vulnerable circumstances. The main non-monetised benefits are associated with an expected reduction in the risk of injury, fatality and damage to property. This would occur through faster restoration of supply or simply providing assistance, guidance and advice to customers who are off-supply and expected lower call waiting times for emergency calls to network operators (calls related to suspected gas leaks, carbon monoxide emergencies and electrical emergencies). These are low probability, high impact events and as such may not be incorporated in the monetary value domestic customers associate with avoiding being off-supply of either gas or electricity (value of lost load), which has been used to estimate the illustrative monetised benefits associated with faster restoration of supply.
- 4.21 Thus, although we are not able to estimate a monetary value for some of these benefits, we expect there to be non-monetised benefits of the policy, in addition to the monetised benefits we have detailed in the draft Impact Assessment. Furthermore, we consider that the non-monetised costs outlined in the draft Impact Assessment (for example suppliers stretching available resources, leading to longer call waiting times), suppliers are either already required to mitigate the risks we outline through existing licence requirements. Therefore, we consider that the costs are proportionate to the benefits that customers may receive, and we consider the policy to be in line with our duties as a regulator.

#### Summary of Competition Impacts

- 4.22 On balance, it is our view that through improving customer service by raising standards across the market, this policy would have a small, and possibly temporary negative impact on competition, primarily due to a possible reduction in the ability of suppliers to offer different levels of customer service, which may impact the small, but not insignificant, number of customers who may switch based on service.
- 4.23 However, we consider that this negative competition impact is outweighed by the significant benefits to consumers this policy would entail. In addition, we do not expect the policy to impact price competition as we do not consider the expected costs to be at a level that would impact on suppliers' ability to differentiate on price and/or price competitively.



## **Public Sector Equality Duty**

- 4.24 Ofgem has a legal duty under section 149 of the Equality Act 2010 to consider the impact of our policies on protected groups under the Public Sector Equality Duty (PSED). The main objective of the PSED is to:
- eliminate discrimination, harassment, victimisation and any other and any other conduct that is prohibited by or under this Act.
  - advance equality of opportunity between persons who share who share a relevant protected characteristic and persons who do not share it.
  - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 4.25 Our assessment is that the main objective of these policies overlaps with the PSED for the following portrayed characteristics: age, disability and pregnancy and maternity.
- 4.26 The draft Impact Assessment identifies the impacts of our policies for these groups and thus, it covers a requirement to complete an Equalities Impact Assessment. As we explain in our costs and benefits assessment for the policies in the draft Impact Assessment, there are benefits which may accrue to those in these protected groups.
- 4.27 For example, the risk of harm from being off-supply (and therefore the benefit from the policy) is likely highest for those who are vulnerable. In addition, all suppliers being available 24/7 would also allow better prioritisation of support and/or appointment booking (or other actions) for customers who are vulnerable and/or at greater risk of harm from being off-supply.<sup>6</sup> We asses that this would provide enhanced protections for those in vulnerable circumstances, in line with our Consumer Interest Framework<sup>7</sup> and provide particular protections in relation to the following characteristics: age, disability and pregnancy and maternity.
- 4.28 Being available 24/7 for customers who are off-supply due to a meter fault would also benefit those in these groups through the policy ensuring that suppliers are providing for equality of opportunity between customers in these groups and those who are not in these groups.

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<sup>6</sup> Through suppliers being made aware of each customer's issue and their circumstances at the earliest opportunity.

<sup>7</sup> [Multiyear Strategy sets out Ofgem's vision for delivering clean, affordable and secure energy system | Ofgem](#)

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- 4.29 For other protected characteristics such as gender reassignment, race, religion or belief, sex, sexual orientation and marriage and civil partnerships, we have not identified any potential for discrimination or adverse impacts from these policies. Furthermore, due to the transient nature of vulnerability, some of these groups may also benefit from these policies at different stages.
- 4.30 Further details can be found in the draft Impact Assessment published alongside this consultation document.

## 5. Update to Contact Ease Guidance

### Section summary

The Contact Ease licence conditions introduced by Ofgem’s 2023 Consumer Standards decision included a requirement for suppliers to have regard to guidance published by Ofgem.

Through this consultation on activating the dormant licence condition, we are also consulting on proposed updates to that Contact Ease guidance document to include an additional section setting out our expectations for suppliers to meet the requirements of SLC 31G.3A(c) and how this interacts with other supplier obligations on the provision of an enquiry service.

### Questions

**Q4. Does the guidance provide sufficient clarity for suppliers, consumers and their representatives on Ofgem’s expectations and consumer outcomes?**

### Contact Ease Guidance Document

#### Consumer Standards Guidance Decision

- 5.1 Supplier standard licence condition (SLC) 31G.3E requires suppliers to have regard to any guidance that Ofgem publishes in relation to the Consumer Standards SLCs 31G.3A to 31G.3D. This includes the currently dormant requirement for a 24/7 enquiry service for customers off-supply due to meter faults in SLC 31G.3A(c).
- 5.2 Alongside our October 2023 Decision we published a Contact Ease Guidance document, setting out our expectations of suppliers and outcomes for consumers of the new licence conditions.
- 5.3 We are proposing to update this guidance document in light of our proposal to activate the dormant licence condition, and through this consultation we are seeking views on the draft updated guidance. Any new guidance will only take effect if we decide to activate the dormant licence condition and will supersede the current version of the Contact Ease Guidance document.

#### Feedback on Previous Draft 24/7 Guidance

- 5.4 As part of July 2023 Consumer Standards Statutory Consultation, within the draft Contact Ease Guidance document, we included a section on the proposed requirement for a 24/7 enquiry service for customers off-supply due to an issue within the supplier’s responsibility.

- 5.5 Following our changes to target the final licence condition at meter faults only, as well as its dormancy as outlined in Chapter 2 of this consultation, we removed the section relating to the 24/7 enquiry service from the final Contact Ease Guidance document.
- 5.6 However, we had received some feedback that remains relevant for the final dormant licence condition we are looking to activate. This is feedback that we have taken into consideration as part of our proposed updates in this consultation.
- 5.7 The main feedback received on the previous draft guidance focused on the clarity of our policy intent, and the practical implications for the enquiry service provided by suppliers. In addition, we were asked to provide greater clarity on our expected customer outcomes of the policy, as well as the interactions with the other Contact Ease licence conditions introduced in 2023.

### **Proposed Changes to Draft 24/7 Guidance**

- 5.8 We have detailed in Appendix 2 the tracked changes we are proposing to make to the previous draft guidance for suppliers' 24/7 enquiry service.
- 5.9 For this we have used the previous draft of the guidance consulted on in July 2023 as the basis for our changes and marked up our proposed changes to enable stakeholders to clearly see where revisions have been made.
- 5.10 We summarise the changes made, and the rationale for doing so, below.

#### Clarity of Intent

- 5.11 In response to stakeholder feedback regarding the policy intent, we amended the final phrasing of the SLC in our October 2023 decision to specifically cover domestic customers off-supply due to meter faults, as opposed to customers off-supply due to any issue within responsibility of the supplier to resolve. The draft guidance has been updated to reflect this change.

#### Interaction with other Contact Ease Licence Conditions

- 5.12 We have clarified in the guidance that suppliers must also have regard to other relevant licence conditions relating to the provision of their enquiry services. This includes SLC 31G.3A subsections (a) and (b):
- SLC 31G.3A(a) requires suppliers to offer a range of contact methods to meet the needs of their customers, including those in vulnerable circumstances. Existing guidance outlines our expectations for meeting customer needs, which would also apply to the provision of a 24/7 enquiry service for customers off-supply due to meter faults. This includes suppliers continuously reviewing the effectiveness of their contact methods and

ensuring that those on offer 24/7 for customers off-supply due to meter faults best meet their customers' needs.

- SLC 31G.3A(b) requires the enquiry service to be available at times that meet the needs of domestic customers, including those in vulnerable circumstances. We state in the existing guidance for this condition that we recognise opening hours may differ across different contact methods. We clarify in our draft updated guidance that this still applies for limb (c), and that we do not expect for all contact methods to be available 24/7 for customers off-supply due to meter faults.

5.13 We have also clarified in the guidance that suppliers are expected to consider how the 24/7 enquiry service they provide, or procure provision of, for customers off-supply due to meter faults can best meet the requirements set out in SLCs 31G.3B (prioritise enquiries from customers in vulnerable situations, or their representatives) and 31G.3C (free to access for consumers that have, or will have, difficulty paying their energy bills).

#### Practical Implications for Suppliers

5.14 As we explained in our Consumer Standards Decision document, our guidance is intended to set out what actions Ofgem currently expects suppliers may need to take to satisfy their underlying licence obligations and suggests possible delivery models.

5.15 It is not, however, seeking to place additional prescriptive requirements onto suppliers by specifying the exact contact methods suppliers must provide to comply with the principles-based licence conditions.

5.16 Our guidance already recognises that each supplier may have different means of meeting their licence requirements, depending on their specific circumstances, business model or customers' needs.

5.17 In practice, suppliers may consider that providing, or procuring the provision of, a 24/7 telephone line is the only or optimal means to comply with the relevant licence conditions, including meeting the needs of their customer base and meeting expectations of good consumer outcomes.

5.18 In response to our previous consultations, some stakeholders suggested that a centralised solution developed between suppliers and network operators could address the underlying issue more efficiently. We remain open to an industry-led solution being developed between relevant parties and we do not consider that activating the licence condition would prevent suppliers and network

operators to deliver an industry-wide approach, if that can be agreed between the parties and still deliver the expected outcomes for customers.

- 5.19 As with all the Contact Ease licence requirements, and as we set out in the existing guidance document, it is for each supplier to actively consider how to ensure and demonstrate that their enquiry service complies with all the principles-based requirements of SLC 31G.3A and best meets the expectations of consumer outcomes set out in the associated guidance.
- 5.20 If a supplier considers that it is able to deliver the expected consumer outcomes through means other than a 24/7 phonenumber/call centre, then that supplier should be able to demonstrate how its solution does so.

*Expected Consumer Outcomes*

- 5.21 In chapter 3 of this consultation, we have set out draft consumer outcomes that we expect suppliers to deliver in complying with the licence condition if activated.
- 5.22 We have included these expected outcomes in the draft guidance update. As with our overall approach to the principles-based Contact Ease licence conditions, we would expect suppliers to be able to demonstrate that their enquiry service is able to deliver on the expected consumer outcomes, whichever way they decide to meet the overarching requirement.
- 5.23 As part of these outcomes for suppliers' enquiry services, we reference the expectation for customers' supply to be restored as soon as possible in line with any existing obligations and standards. This should include the minimum standards as set out currently in the Guaranteed Standards of Performance (GSOP), or any future minimum standards that may be implemented as part of our upcoming wider review of the GSOP framework. This expected outcome does not directly place any additional obligation on suppliers above and beyond existing requirements to investigate and fix meter faults but emphasises our expectation of adherence to them when contact hours for meter faults are extended.
- 5.24 We have also clarified as part of these expected consumer outcomes that it should be clear to consumers which parties to contact in which situations. As we explain in chapter 3 of this consultation, we do not want confusion to be created for consumers in emergency situations around who to contact first, potentially delaying a necessary emergency response.

- 5.25 We would, therefore, expect all industry parties to be clear when communicating the available contact channels to consumers, as is currently done by industry for similar situations during suppliers' regular contact hours.

## **Appendices**

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## Appendix 1 – Licence Modification

### Draft of proposed modifications to the standard conditions (SLCs) of all electricity and gas supply licences

We are proposing the below modification of SLC 31G.3A in both electricity and gas supply licences. Deletions are shown in ~~strikethrough~~ and new text is double underlined.

#### Condition 31G. Assistance and advice information

...

31G.3A The licensee must provide, or procure the provision of, an enquiry service that enables Domestic Customers to contact the licensee. As a minimum the enquiry service must:

- (a) Offer a range of contact methods that meet the needs of the licensee's Domestic Customers, including those of its Domestic Customers in Vulnerable Situations;
- (b) Be available to receive enquiries and offer assistance, guidance, or advice at times that meet the needs of Domestic Customers, including those of Domestic Customers in Vulnerable Situations; and
- (c) Be available 24 hours every day to receive enquiries from, and offer assistance, guidance, or advice to, Domestic Customers who are experiencing an interruption in supply of electricity caused by a meter fault.

~~Paragraph (c) in this Condition 31G.3A will only take effect following consultation and after the Authority has given the licensee at least two months' Notice.~~

## Appendix 2 – Draft Updated Guidance

### Contact Ease Guidance Document

A2.1 Alongside the Consumer Standards decision in October 2023, we published a Contact Ease guidance document which sets out our expectations on consumer outcomes for relevant licence conditions. The full guidance document is published here:

A2.2 Under supplier Standard Licence Condition (SLC) 31G.3E, suppliers must have regard to this guidance when complying with the relevant licence conditions.

A2.3 Below we have set out a proposed update to the guidance document to include a section on 24/7 metering support which accompanies our proposal to activate SLC 31G.3A(c).

A2.4 We have used the previous draft of the guidance consulted on in July 2023 (available here: [Consumer Standards - Statutory Consultation | Ofgem](#)) as the basis for our changes and marked up our proposed changes to enable stakeholders to clearly see where revisions have been made since we last consulted on the accompanying guidance.

A2.5 Deletions are shown in ~~strikethrough~~ and new text is double underlined.

### Draft Update: Open 24/7 for customers that are experiencing an interruption in supply

#### Obligation

A2.6 SLC 31G.3A c) Be available 24 hours every day to receive enquiries from, and offer assistance, guidance, or advice to, Domestic Customers who are experiencing an interruption in supply of electricity/gas caused by a meter fault.

#### Our expectations

A2.7 Network distribution companies have existing licence obligations to provide 24/7 services for consumers without power and consumers with gas leaks. We consider that this is critical in keeping consumers safe.

A2.8 We consider that suppliers should also offer a 24/7 enquiry service to receive reports and offer immediate information, guidance or advice about issues where a customer is off-supply due to a meter fault. ~~and it is the suppliers' role to help restore supply.~~

~~A2.9 We consider that these issues are typically likely to be meter issues, such as faulty meters, including smart meters.~~

~~A2.10 In addition to receiving reports and offering assistance, we note that through the Retail Energy Code modification 'REC0053 – '24/7 Emergency Metering Service'', the industry is considering what changes may be required to provide emergency~~

~~out of hours metering services to support consumers that are off supply due to supply meter issues. We are supportive of the industry considering ideas to improve consumer outcomes and encourage industry to progress this code modification at speed.~~

A2.11 We do not expect suppliers to provide a 24/7 enquiry service for all customers (eg customers wanting to submit a meter reading). The minimum requirements for this licence condition covers only customers off-supply due to a meter fault.

A2.12 The outcomes that we would expect suppliers' enquiry service to deliver for customers include:

- i) The customer understands which organisation to contact and how, and that the relevant contact information is clear and easy to find.
- ii) The supplier is available to receive enquiries from customers off-supply due to meter faults, to triage what might be causing the interruption in supply and determine if it is urgent. We would expect the supplier to offer assistance, guidance or advice to resolve the issue at the time of the enquiry where this is possible, or at the earliest opportunity.
- iii) The customer's supply is restored as soon as possible in line with existing obligations, and the customer is advised of the supplier's process to investigate and fix any meter fault, including an estimated timeline for the issue to be investigated or resolved if it is in the supplier's control.
- iv) The supplier to consider whether a customer requires further assistance, in line with existing licence obligations, especially if that customer is in a vulnerable circumstance.

A2.13 We consider that our proposed licence drafting does not preclude suppliers from making commercial decisions on how to implement the provision of this service.

A2.14 When providing, or procuring the provision of, the 24/7 enquiry service for customers off-supply due to meter faults, suppliers must also have regard to the guidance for other relevant licence conditions.

A2.15 In particular, we would expect suppliers to ensure the contact method(s) used to provide the 24/7 enquiry service for customers off-supply due to meter faults can

meet the needs of its domestic customers, including those of customers in vulnerable situations, as set out in paragraphs 1.26 – 1.27 of this guidance.<sup>8</sup>

A2.16 For clarity, we would not expect all chosen contact methods to be available 24/7 and recognise that different contact methods may have different opening times, as set out in paragraph 1.32 of this guidance document.

A2.17 We do expect suppliers to be able to demonstrate how the 24/7 enquiry service provision is able to prioritise enquiries from domestic customers in vulnerable circumstances or their representatives (in line with guidance for SLC 31G.3B) and be free to access for domestic customers that have, or will have, difficulty paying their energy bills (in line with guidance for SLC 31G.3C).

A2.18 We intend to work with network companies and suppliers to help facilitate the delivery of good consumer outcomes.

A2.19 We do not expect consumers to be able to determine whether their loss of supply is due to network issues or supplier issues. We will therefore work with network companies and suppliers to ensure that it is clear who customers should contact in emergency situations.

A2.20 As is currently achieved for services during regular opening hours, we consider it important that industry's consumer messaging does not create confusion for consumers in who to contact in which situations, and that no unnecessary delays are caused for consumers reporting potential emergencies to the network operator, especially for potential gas emergencies.

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<sup>8</sup> For clarity, this references the current guidance document published in October 2023, available here: [www.ofgem.gov.uk/decision/consumer-standards-decision](http://www.ofgem.gov.uk/decision/consumer-standards-decision)

## Appendix 3 – Privacy notice on consultations

### Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

#### **1. The identity of the controller and contact details of our Data Protection Officer:**

The Gas and Electricity Markets Authority is the controller, (for ease of reference, "Ofgem"). The Data Protection Officer can be contacted at [dpo@ofgem.gov.uk](mailto:dpo@ofgem.gov.uk)

#### **2. Why we are collecting your personal data:**

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

#### **3. Our legal basis for processing your personal data:**

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

#### **4. We will not share your data with other organisations outside of Ofgem.**

#### **5. For how long we will keep your personal data, or criteria used to determine the retention period.**

Your personal data will be held for

#### **6. Your rights:**

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data.
- access your personal data.
- have personal data corrected if it is inaccurate or incomplete.
- ask us to delete personal data when we no longer need it.
- ask us to restrict how we process your data.
- get your data from us and re-use it across other services.
- object to certain ways we use your data.

- be safeguarded against risks where decisions based on your data are taken entirely automatically.
- tell us if we can share your information with 3<sup>rd</sup> parties.
- tell us your preferred frequency, content and format of our communications with you.
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

**7. Your personal data will not be sent overseas.**

**8. Your personal data will not be used for any automated decision making.**

**9. Your personal data will be stored in a secure government IT system.**

**10. More information:** For more information on how Ofgem processes your data, click on the link to our "[Ofgem privacy promise](#)".