

20<sup>th</sup> December 2024

Ofgem,  
10 South Colonnade,  
Canary Wharf,  
London,  
E14 4PU



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

This non-confidential representation is made on behalf of Cadent in response to the above statutory consultation.

As a licenced Gas Transporter and the operator of the National Gas Emergency Service (NGES) on behalf of all Gas Distribution Networks (GDNs) and Independent Gas Transporters, we welcome Ofgem's decision to proceed with its statutory consultation process with the view to activating Standard Licence Condition (SLC) 31G.3A(c).

### **Evidence suggests that non-emergency calls still pose a risk to the effective, safety-critical operation of the National Gas Emergency Service**

As the operator of the NGES, we have access to a range of data that we believe supports the need for intervention by Ofgem, starting with the activation of SLC 31G.3A(c).

Although we have implemented internal safeguards, promoted awareness of the intended use of the NGES, and have engaged with other organisations to support the development of an industry-led solution, we are concerned that the risk posed by non-emergency calls to the NGES still remains. The issue of fielding supplier-related enquiries into the NGES (particularly out of hours) can cause genuine emergency calls to queue, potentially extending the time that consumers are exposed to gas leaks and/or suspected carbon monoxide.

As outlined in our July 2024 RFI response, the NGES continues to field a high rate of calls unrelated to scenarios where a GDN would dispatch an emergency engineer. Extrapolating the data from a representative sample of calls fielded in December 2022, we believe the NGES received in excess of 119,000 (c.62%) out of hours enquiries (between 20:00 –



08:00) unrelated to a gas emergency last financial year. The types of scenarios within this sample included: supplier-related issues (c.33% of all calls), appliance problems, and other miscellaneous forms of enquiries.

A further metric that supports the need for regulatory intervention is the measure of GDN emergency work orders created as a ratio of total incoming calls into the NGES. We would expect to see a high percentage of incoming calls translate into emergency work orders (i.e. enquiries that require GDN engineer visits) when the helpline is operating effectively.

Cadent has monitored this metric since November 2022 and although gradual improvements have been made, a concerningly low number of inbound calls (particularly at weekends) still result in the creation of GDN emergency work orders – see below table.

Year	Weekday Average (% calls resulting in a GDN Emergency Work Order)	Weekend Average (% calls resulting in a GDN Emergency Work Order)
2023-2024	58.4%	46.4%
2024 – 2025 (Year to Date)	69.7%	50.0%

### **Cadent's key areas of feedback on the Statutory Consultation's proposals**

Below is a summary of Cadent's key positions on the consultation's proposals:

- Whilst supportive of the overarching proposal to activate SLC 31G.3A(c), we believe the licence drafting relating to “...*Domestic Customers who are experiencing an interruption in supply caused by a meter fault*” is potentially too restrictive when defining the scope of scenarios that suppliers are obligated to provide 24/7 assistance to customers under. Our concern is that by explicitly referring to supply interruptions caused by meter faults, consumers experiencing other forms of out of hours supply outages (that fall within a supplier's remit to resolve) may not receive timely assistance and may look to emergency operators for guidance.

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**National Gas Emergency Service**  
**0800 111 999\* (24hrs)**

\*Calls will be recorded and may be monitored

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**Page 2 of 4**



It is important to note that we consider activation of a licence condition that requires gas suppliers to provide 24/7 enquiries services to domestic consumers experiencing supply interruptions caused by meter faults to be an important step towards safeguarding the effectiveness of the NGES. To build on this important progress, we would welcome continued engagement with Ofgem through their Consumer Standards work to address the remaining risk posed to the NGES through fielding other forms of supplier-related enquiries.

- Understandably, the structure of the parties that form the energy market can seem complex to domestic consumers. As such and even with the activation of SLC 31G.3A(c), it is reasonable to expect a small number of consumers to either:
  - a) Contact their energy supplier with an issue that they believe to be supplier-related, but is subsequently confirmed as either a gas or electricity emergency and should be directed at the national emergency helpline operator, or,
  - b) As within the current arrangements, contact the national emergency helpline operator with an issue that is confirmed as non-emergency and supplier-related after information gathering from the call agent.

Under scenario a), it is essential that suppliers are able to effectively recognise misdirected gas/electricity emergencies and hand them over to the relevant national emergency helpline operator without delay.

Alternatively, and under scenario b), suppliers will need to clearly communicate the reverse process to National Emergency Helpline operators; for example, when a consumer contacts 0800 111999 with a suspected gas emergency but actually requires assistance from their supplier to resolve a metering-related outage. The range and complexity of communication channels could be increased by suppliers choosing to operate individual 24/7 services, and we encourage suppliers to consider this complexity as part of implementation (subject to Ofgem's statutory consultation decision).

- We note both Ofgem's disappointment that licensees have not been able to develop an industry-led solution to date, and that the principles-based licence drafting still provides scope for centralised 24/7 enquiries services. Insights from our operational teams suggest that a small number of suppliers are already



operating telephony enquiries services out of hours. However, the majority of suppliers still do not offer out of hours assistance to customers in any form and instead divert consumers to the NGES. As the operator of a national emergency helpline with expertise in this area, we remain open for dialogue with industry on what a centralised solution could look like. However, we believe it is paramount that there is an appetite from all parties and that the duty holders under licence (i.e. all suppliers) drive how their regulatory obligations are discharged.

- We support the inclusion of drafting within the updated Contact Ease Guidance Document relating to the obligation on suppliers to ensure that the contact method(s) used to provide the 24/7 enquiry service can meet the needs of its domestic customers (particularly those in vulnerable situations). We consider this to be an essential inclusion, as through our provision of the NGES we have witnessed firsthand the importance of being able to effectively support all customer interactions (e.g. promote digital inclusion and offer a translation service for customers that speak English as an additional language etc.).

Additionally, we support the inclusion of guidance relating to the provision of advice to customers on the supplier's process to investigate and fix any meter fault, including an estimated timeline for the issue to be resolved. We believe this obligation to be important, as customers may turn to other parties for clarity in error (including national emergency helpline operators), in the event of suppliers failing to clearly communicate next steps and expected timelines.

We remain committed to supporting industry to find solutions that deliver better outcomes to all consumers whilst protecting the integrity of the safety-critical service provided by the NGES.

Yours faithfully,

Edward Allard  
Industry Codes Manager