

Steve Kirkwood
Senior Policy Advisor (Retail)
Office of Gas and Electricity Markets
10 South Colonnade
Canary Wharf
London
E14 4PU

19th December 2024

Dear Steve,

Re: Consumer Standards – 24/7 Metering Support Statutory Consultation.

I am writing on behalf of National Grid Electricity Distribution (South Wales) plc, National Grid Electricity Distribution (South West) plc, National Grid Electricity Distribution (East Midlands) plc and National Grid Electricity Distribution (West Midlands) plc, collectively known as “NGED”, in response to Ofgem’s consultation on 24/7 Metering Support.

NGED welcomes the opportunity to respond to this consultation. We agree with Ofgem’s proposals to switch on the currently dormant SLC 31GA(c) to ensure that customers can contact suppliers on a 24/7 basis in the event of a meter fault. However, we consider that the proposals do not go far enough to drive the desired output of improving expected consumer outcomes. In addition, the impact assessment alludes to improvements in costs and/or call waiting times for network companies resulting from improvements in customers’ ability to report issues directly to their suppliers. This assumes that the 24/7 availability for reporting an issue will result in a faster resolution.

Our responses to the specific questions posed in the consultation are set out below.

Question	Response
Q1: Do you agree with our proposal to activate supplier SLC 31G.3A(C) in order to meet our desired outcome for consumers?	Yes, we agree with Ofgem’s proposal to activate SLC 31G.3A(c). We have seen little effort from suppliers to attempt to resolve concerns for consumers in this respect, since Ofgem’s consultation in 2023. We recognise that consumers are less interested in which party is responsible for any given power cut, but instead require the ability to report the problem and achieve a resolution. This should include the ability to contact their supplier with ease where the issue is known to relate to a meter fault.
Q2: Are there any further issues with implementation that we have not considered in this consultation?	None identified.

<p>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?</p>	<p>We believe that Ofgem's proposed actions may not go far enough to achieve the desired output of improving consumer outcomes. The impact assessment is focused on the potential monetary and non-monetary benefits of customers, who are experiencing an interruption in supply caused by a meter fault, being able to report that fault to their supplier with greater ease. However, the impact assessment does not take account of the potential impacts where the reported fault continues to be met with inaction until the next working day.</p> <p>We also note that Ofgem anticipate that these proposals should drive a reduction in the call waiting times and/or costs for providing a call service for network providers. The lack of measures to encourage not only a 24/7 reporting function, but also a requirement to expedite action to resolve the meter issue, particularly for customers in vulnerable situations, will likely limit the positive impact gained. There is a risk that customers who report their fault to the supplier, but continue to wait until the next working day for a resolution, will persist with contacting the network companies in an attempt to obtain a faster or temporary resolution.</p>
<p>Q4: Does the guidance provide sufficient clarity for suppliers, consumers and their representatives on Ofgem's expectations and consumer outcomes?</p>	<p>We agree that the guidance provides sufficient clarity for the amendments proposed, that being to invoke SLC 31GA(c). Should Ofgem consider further expanding its expectations of suppliers, including with respect to the speed with which meter faults should be resolved, the guidance will require further amendments to ensure the expected customer outcomes are clear.</p>

We trust that this response is useful. However, should you wish to discuss these points further, please do not hesitate to contact me.

Yours sincerely



Vanessa Buxton
Regulatory Compliance Manager