

Citizens Advice response to Ofgem call for input, Reviewing the Supplier Guaranteed Standards of Performance (GSOP)



Executive summary

We welcome this initiative to review the role, scope, design and operation of the Guaranteed Standards of Performance (GSOP). Citizens Advice broadly supports the use of automatic compensation and feel that it can be an effective mechanism to establish minimum standards, incentivise suppliers to improve performance, and can engender improvements in consumer satisfaction and trust.

Prior to the implementation of any major changes to the GSOP framework, we recommend that Ofgem undertake the following steps:

- Rigorously analyse GSOP performance data since their implementation, by supplier and individual GSOP, to scrutinise trends, enable comparison of supplier performance and to draw out evidence of their impact in reducing consumer harm;
- Review consumer research to understand consumer views towards the GSOPs, digging into perspectives on their scope, efficacy, payment levels and links to consumer satisfaction;
- Work with suppliers to explore the existing mechanisms in place to monitor GSOP performance, keep track of trends and spikes in non-compliance and efforts aimed at improving supplier performance;

When designing a revised GSOP framework, we recommend that Ofgem:

- Sets target performance levels for all GSOPs, in line with Ofgem's compliance operating principles, with non-compliance triggering further engagement;
- Establishes authority to implement enforcement measures when GSOP targets are repeatedly missed;
- Ensures regular publication of GSOP performance and agreed supplier improvement plans that can be analysed and compared;

There is currently little public evidence to indicate whether GSOPs are effective in reducing incidences of consumer harm or if they establish minimum standards of supplier performance. Furthermore, it is unclear whether suppliers are proactively reviewing their GSOP performance data and implementing improvement measures where needed, or simply absorbing them as a standard cost of doing business. There is now an opportunity for Ofgem to review and mitigate this risk by establishing more formal baselines of what is acceptable GSOP performance. Ofgem should then regularly review GSOP performance data and undertake investigations and enforcement action for non-compliance.

We are supportive of the need for greater scrutiny of supplier performance on GSOP issues. If the intention of the GSOPs is to incentivise improved supplier performance

and increase consumer trust, then public examination of performance levels by supplier and issue should be facilitated.

We agree that there is scope to extend GSOPs to some new areas, but emphasise the need to also make progress on the design of the broader regulatory framework - including consumer outcomes - to ensure these are appropriate. We agree that these should be used in areas of service where performance can be clearly measured to a set benchmark. It is also important that they are applied where a fixed level of compensation payment is likely to be suitable for the range of consumer harm that may arise from a service failure.

On this basis, we think Ofgem should explore the extension of GSOPs in some limited areas, including:

- The provision of accurate bills using meter readings, alongside a reduction in the backbilling period for smart meters to 6 months;
- Supplier's failure to record a complaint or to issue an 8 week/deadlock letter in a timely manner;
- Adherence to pre-payment meter installation processes, building from Ofgem's established compensation framework;

As part of this review, we recommend that Ofgem also consider the potential for GSOPs in areas relevant to home decarbonisation to protect consumers as the market evolves to meet net zero targets. This could include processes to remove gas metering and enable export from smart technology. This is an area that is quickly developing, and it is important that Ofgem supports a smooth consumer experience and minimise potential for detriment.

We also recommend that Ofgem consider extending relevant aspects of the GSOP framework to the following groups:

- Non-domestic suppliers, specifically small and microbusinesses;
- Heat networks, with the understanding that a specific consultation for heat networks is due to be released in early 2026 which will consider the feasibility of specific Standards;
- Extension of automatic compensation to all gas and electricity network standards as outlined in our 2024 Standard issue update report¹.

We outlined our recommendations for Guaranteed Standards specific to smart metering equipment in our May² and September³ 2025 consultation responses. As

¹ Citizens Advice, [Standard Issue Update](#), September 2024

² [Citizens Advice Response to Ofgem's Smart Guaranteed Standards Consultation](#), May 2025

³ [Citizens Advice Response to Ofgem Statutory Consultation on Smart Guaranteed Standards of Performance](#), September 2025

mentioned in those responses we particularly support Ofgem's proposal to include issues that fall under the DCC's control. We urge Ofgem to push forward with this as soon as possible, and take further steps to mitigate the current accountability gap between the DCC and energy suppliers, to ensure that the Guaranteed Standards are meaningful and drive better consumer outcomes.⁴

We are supportive of Ofgem's intention to review payment amounts and methodology, and are particularly supportive of the possibility of introducing repeat payments for ongoing breaches as this may incentivise suppliers to implement corrective behaviour and address root causes. However, we note that increasing the value of the GSOPs needs to be balanced against the possibility of increasing costs on consumers.

Please see our detailed consultation response below.

⁴ [Citizens Advice Response to DESNZ's Smart Metering Framework Post 2025 Consultation](#), October 2025

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Response to Call for Input

The role of GSOPs

We agree that GSOPs should be one mechanism used in combination with a range of regulatory options used to deliver good consumer outcomes. We have long asserted that automatic compensation can be an effective tool in setting clear standards of service, driving improvements in performance and facilitating an increase in trust between consumers and suppliers.⁵ They are particularly valuable in areas of service which are less driven by competition, or where prescribed systems/processes are used. However, we also recognise the limitations of GSOPs as a regulatory mechanism. Their automated nature means they cannot be used for complex issues that require substantive investigation and they are generally not intended to fully compensate for harm, rather are seen as a mechanism to recognise inconvenience.

There are good reasons for these limitations - they do not require proactive consumer engagement to raise a complaint, nor does a supplier have to launch a complex and lengthy investigation, resulting in quick resolutions and pay-outs, which allows them to be an effective tool. Given these limitations, it remains vital that Ofgem continues to use all the regulatory options available to them. **Proactive monitoring, and strong compliance and enforcement action will become even more important for an outcomes-focused regulatory environment to deliver consumer benefits.**

If the energy retail market does move towards a more outcomes-based regulatory framework, there is potential to expand the use of GSOPs in some areas. However, in considering possible revisions we urge Ofgem to ensure that the automated nature of the GSOPs is retained to reduce the burden on consumers in achieving restitution. We broadly agree with the draft objectives for the GSOP framework and the draft criteria for individual standards, as outlined in the call for input.

To ensure the GSOP regime is effective, Ofgem should introduce target performance levels, monitoring mechanisms and enforcement for continued non-compliance, particularly if more GSOPs are introduced to replace standard licence conditions.

Currently, there is limited public information on the effectiveness of the GSOPs. The data included in the call for input (paragraphs 1.15 and 1.16) is very topline and covers a relatively short time frame, which makes it challenging to determine the historic and ongoing effectiveness of the GSOPs. It is unclear whether the drop in number of breaches in 2023 and 2024 when compared to 2022 is due to concerted corrective measures put in place by suppliers, or other factors.

⁵ Citizens Advice, [Automation for the Nation](#), November 2018; [Citizens Advice response to Ofgem's statutory consultation on supplier GSOP payments inflation uplift](#), August 2024; [Citizens Advice response to DESNZ's Review of Ofgem](#), March 2025

Therefore, in advance of any alterations to the framework or expansion of the GSOPs we urge Ofgem to undertake rigorous analysis into the effectiveness in GSOPs reducing consumer harm over the last decade. This could be achieved by Ofgem implementing the following steps: obtaining GSOP performance data from the last decade, broken down by supplier and individual GSOP; interrogating this data to identify trends, peaks, areas and suppliers of concern and areas of improvement; and discussing the data with suppliers and examining their process for adhering to GSOPs and reducing incidents of consumer harm.

Whilst we believe that consumers are likely to favour automatic compensation where appropriate, this has not been rigorously researched, and there is little insight into consumer awareness of GSOPs or their satisfaction around payment values.⁶ Moreover, as GSOP performance data is not publicly available and consumers are unable to compare supplier performance in this area it is unclear how the GSOPs are impacting consumer confidence and engagement in the market. Further analysis into their efficacy, combined with research into consumer views of the GSOPs, would be beneficial.

Scope

Coverage of Customers:

We are supportive of Ofgem's plans to review additional areas that could fall within the GSOP framework, and **strongly urge Ofgem to extend GSOPs to the non-domestic market** in relevant areas, to drive improvements in the experience of small and microbusinesses.

In our response to Ofgem's consultation on smart meter GSOPs⁷, we called for small and micro-businesses to be provided with the same rights as domestic customers. We were disappointed to see that the consultation proposed applying new standards to only microbusinesses and would reiterate to Ofgem the importance of including both small and microbusinesses within the scope of this change⁸.

⁶ Which?, [Compensation for when things go wrong](#), June 2016, found that "Regulators did not appear, as a matter of course, to commission or use consumer research to assist them in deciding on compensation levels. Research commissioned by regulators appears to have been occasional and partial and there was rarely a clear line of sight from consumer research to regulators' decisions. Where research indicated a clear consumer view and this was not subsequently reflected in the levels of compensation, we could not find any justification for the regulators' decision."

⁷ [Citizens Advice Response to Ofgem's Smart Guaranteed Standards Consultation](#), May 2025

⁸ [Citizens Advice Response to Ofgem Statutory Consultation on Smart Guaranteed Standards of Performance](#), September 2025

Non-domestic (specifically microbusiness) consumers are currently protected by the following GSOPs: Supply restoration; Supply restoration: multiple interruptions; Distributor's fuse; Notice of supply interruption; Voltage complaint; Appointments; Payments.⁹ Expanding these GSOPS to small businesses would make sense as Ofgem have previously recognised that small businesses (including micro) operate more similarly to domestic consumers than larger non-domestic operations in the retail market, and the regulatory mechanism must be updated to reflect that. We also recommend that Ofgem consider including small and microbusinesses in the new GSOPS that we have suggested below.

We consider that some of the example changes laid out to service areas in the call for input should be extended to small businesses as well as domestic consumers. Specifically, we are supportive of a possible GSOP for small and microbusiness consumers related to billing and adherence to complaints handling data recording and timescales. Ofgem's 2024 Non-domestic Market Review¹⁰, which introduced the definition of small businesses into the Gas and Electricity Regulated Providers (Redress Scheme) Order 2008, also introduced a range of protections for businesses larger than microbusinesses, with the recognition that small businesses often need help to resolve issues with their supplier. For avoidance of doubt and the creation of a two-tier system of protection with regards to Guaranteed Standards, we think the proposal should be amended to include both small and microbusinesses within this change. We cannot comment on the suitability of including larger non-domestic premises within the scope of this proposal, as small businesses are the limit of our statutory remit.

In principle, Citizens Advice also supports the extension of GSOPs to **heat networks**, to supplement the forthcoming regulatory rules¹¹ and establish minimum standards of performance in an area that has, up until now, lacked consistency. We understand that Ofgem are due to consult on this later in 2026, and welcome the opportunity to respond to that consultation. We acknowledge that the complexity of heat networks, including the wider range of systems and processes currently in use, means that any GSOPs will likely have to be designed and implemented carefully over time, including options like segmented payments based on the size of heat networks may be required¹².

We also want to take this opportunity to reiterate our call for the extension of automatic compensation to all **gas and electricity network standards**, as outlined in our 2024

⁹ Ofgem, [Adjustments to the Guaranteed Standards of Performance: 2025](#)

UK Statutory Instruments (2015) [The Electricity \(Standards of Performance\) Regulations 2015](#)

¹⁰ Ofgem, [Non-domestic market review: decision](#), April 2024

¹¹ Ofgem, [Countdown to the launch of new regulatory rules for heat networks](#), January 2026

¹² [Citizens Advice response to Ofgem and DESNZ's joint consultation on implementing consumer protections for heat networks](#), January 2025

Standard issue update report¹³. Furthermore, we urge Ofgem to strengthen the existing GSOP framework by introducing specific protections to protect vulnerable consumers during power cuts. Unlike the gas sector, there is currently no equivalent GSOP protection in electricity. To address this gap, we suggest that Ofgem consider introducing a new electricity GSOP that would require network companies to provide temporary alternative power solutions, such as mobile generators, battery packs, or portable charging equipment, to households most in need during prolonged outages¹⁴.

Service Areas:

For the energy retail sector, GSOPs should be automated, requiring minimal input from consumers, and not needing complex subjective assessment by suppliers.

Therefore, GSOPs should not replace areas within the current SLCs that have a significant level of ambiguity, are open to interpretation or where different approaches can deliver the same outcome. They are also less appropriate where issues are likely to have a wider range of detriment. GSOPs are likely to be appropriate where suppliers already have rigorous monitoring and record keeping in place, or where such a system should be introduced as it would more broadly assist with compliance of existing rules and would lead to more positive behaviours.

To incentivise better supplier performance, it is vital that any new GSOPs are designed in a way that enables ease of application and where the cost of effectively meeting the GSOP is not substantially greater than payment of the GSOP themselves. Otherwise there is the risk that suppliers are being set-up to fail and that the cost of this failure is then passed onto consumers via their bills.

Where these conditions are met, Ofgem should consider extending existing GSOPs to the critical issues that are having more impact on consumers. The current GSOPs do not correspond with the most common issues that consumers contact us about. It is unclear whether this is due to the GSOPs driving suppliers to make concerted efforts to ensure high performance across these areas.

Below we have outlined some areas where we think GSOPs could be introduced to replace SLCs or to enforce existing codes of practice and legislation. However, we also feel that GSOPs could be introduced alongside existing SLCs and regulatory frameworks, with GSOPs complementing and bolstering existing regulation. We have focused on these issues as we believe that introducing GSOPs to these areas could have a real impact on consumer harm.

¹³ Citizens Advice, [Standard Issue Update](#), September 2024

¹⁴ [Citizens Advice response to Ofgem's Sector-Specific Methodology Consultation for ED3](#), December 2025

We recommend that Ofgem consider expanding GSOPs to these areas, but this must be done in combination with establishing a more rigorous monitoring and compliance mechanism to ensure they are achieving the objectives outlined in the call for input, rather than being absorbed by suppliers as an ongoing business cost. Furthermore, as outlined in more detail below, we recommend that supplier performance against each GSOP category is made more transparent to incentivise improvements in supplier behaviour and to encourage consumer interest and facilitate greater levels of trust. We recommend that the below should be extended to both domestic and non-domestic consumers, specifically small and microbusinesses.

Proposed extension to service areas:

- **Billing based on meter readings (SLC 21B)**

Billing error issues continue to be the second most common reason for which consumers seek assistance from Citizens Advice - this has been consistent for many years, and prior to the energy crisis, billing was the primary energy issue that consumers contacted us about. The fact that this has been a consistent cause of concern from consumers could indicate that the current SLCs are not driving sufficient improvement in supplier processes. Billing is also an area of the rulebook that has seen limited enforcement action from Ofgem, and may benefit from additional compliance mechanisms such as GSOPs.

Within the Billing Errors category, inaccurate or estimated bills is the most common issue that consumers ask us about, whilst consumers querying whether they are responsible for all or part of their bills¹⁵ is the second most common issue that we are contacted about. The third billing error issue that we are most often asked about is catch-up bills, whereby consumers receive a large bill covering multiple months of energy use and are concerned about the high value and how to cover the cost. The increase in the number of households with smart meters has led to a general improvement in consumer satisfaction with bill accuracy¹⁶. However, recent research¹⁷ has found that a third of respondents with a smart meter had to submit a manual meter reading to their supplier in the last year, whilst 3 in 10 said that their smart meter wasn't meeting their expectations for billing accuracy. As the cost of energy is so high, and household

¹⁵ This can be driven by various issues, including the possibility that the supplier has mistakenly charged a consumer for a different property's energy consumption, or due to complications arising from a change in tenancy or moving house.

¹⁶ Overall satisfaction with bill accuracy reached an all time high at 80%, and dissatisfaction reached an all time low, at 6%. Ofgem and Citizens Advice, [Energy Consumer Satisfaction Survey](#), May 2025

¹⁷ Forthcoming Citizens Advice report on smart meters

finances so stretched¹⁸, when billing practices go wrong, the impact on households can be significant.

Getting billing right is fundamental to the customer experience, and research has demonstrated that it is clearly linked to customer satisfaction with the energy industry¹⁹. It is also an area that can lead to other issues, specifically around debt, that are causing consumers and the wider industry significant levels of concern. Taking steps to make bills more accurate will help address some of these wider issues, and may lead to greater levels of consumer confidence.

To upgrade billing protections to reflect the capability of smart meters, we've recommended that Ofgem revises backbilling rules and reduces the backbilling period for households with smart meters from 12 months to 6 months. Despite the introduction of backbilling rules in 2018, backbilling issues continue to impact thousands of people each year²⁰. In 2025 alone, our consumer service team helped over 1,730 clients²¹ with potential violations of SLC 21BA, whilst the EO handled 3,218 disputes related to backbilling in 2024²². We think backbilling rules are the best primary mechanism to improve billing practice and protect consumers, as the protection automatically scales with energy usage and financial risk.

The review of GSOPs provides an opportunity to consider other changes which could improve billing practices for all consumers. SLC 21B.1 and 21B.2 requires that “if a customer provides a meter reading to the licensee that the licensee considers reasonably accurate, or if the Electricity Meter is read by the licensee, the licensee must take all reasonable steps to reflect the meter reading in the next Bill or statement of account sent to the Customer” and where “the licensee considers that a meter reading provided by a Customer is not reasonably accurate, the licensee must take all reasonable steps to contact the Customer to obtain a new meter reading from him”.

¹⁸ Four million people in England and Wales in a negative budget in 2024/25, including 860,000 children. Citizens Advice, [The National Red Index 2025: negative budget households face a debt crisis like quicksand](#), October 2025

¹⁹ Ease of contacting their supplier and bill satisfaction emerge as joint top predictors of overall consumer satisfaction, with relative importance scores of 35% and 34% respectively. ‘What drives consumer satisfaction with energy suppliers?’ Ofgem, [Energy Consumer Satisfaction Survey: January 2025](#), July 2025

²⁰ Citizens Advice, [Footling the bill: How the energy bill protection gap is putting strain on households](#), November 2024

²¹ 7,300 individual contacts (which could include incidents of the same consumer contacting us on multiple occasions).

²² [Energy Ombudsman Reports 24% Drop in Complaints](#), May 2025

These SLCs could be incorporated into the GSOPs to facilitate more consistent gathering and use of meter readings in customers' energy bills. Some guidance would need to be provided by Ofgem to clarify the meaning of "all reasonable steps" to ensure consistency in application and to facilitate the automated function of the GSOP. Moving these SLCs into a GSOP could reduce the number of estimated bills being issued by suppliers and improve consumer confidence in the accuracy of their bills. It could also have a positive impact on the number of shock, catch-up bills that consumers are receiving, and minimise the amount of debt in the system.

Billing is also the most common cause of complaints to the Energy Ombudsman (EO),²³ and the cost of resolving a full dispute is on average £300²⁴. The introduction of these GSOPs, if implemented in a manner that tangibly leads to improvements in the accuracy of energy bills, could lead to fewer billing complaints being referred to the EO.

To assess the potential impact of this change, Ofgem should seek data from suppliers on the causes of estimated billing, including the number of cases where meter readings are provided by consumers or collected by suppliers, but not subsequently reflected in the next bill. We also encourage Ofgem to examine other areas related to billing accuracy and frequency that could benefit from a GSOP.

Billing issues are the most common reason that small businesses get in touch with the Citizens Advice Consumer Service. Businesses struggle with a range of key retail activities related to billing, including getting accurate bills, receiving estimated bills (even where a customer provides meter reads/has a smart meter), and receiving final bills. Inconsistent or inaccurate billing can cause debt to rack up, which can threaten the stability of a business.²⁵ Therefore, we recommend the introduction of an accurate billing GSOP for non-domestic suppliers, and note that it would be highly beneficial for small businesses.

²³ Energy Ombudsman, [Disputes Data Q3: July - September 2025](#)

²⁴ Department for Energy Security and Net Zero, [New threshold for businesses accessing the Energy Ombudsman](#), Updated September 2024

²⁵ Citizens Advice, [Risky Business? How the energy debt protection gap is putting the pressure on small businesses](#), October 2024; Citizens Advice, [Small and micro businesses experiences of the energy retail market](#), March 2025

- **Supplier's failure to record a complaint or to issue an 8 week/deadlock letter in a timely manner;**

Under existing regulations²⁶ suppliers are obligated to keep a clear record of a consumer's complaint, and are also required to inform the consumer of their right to a free and independent redress scheme, if their complaint is not resolved within 8 weeks. This communication would typically be in the form of a deadlock letter issued by the supplier if the complaint is not resolved, or signposting by the supplier to the Energy Ombudsman (EO).

Yet, the EO has reported that in the first half of 2025, signposting occurred in less than half of all the complaints they managed²⁷. In a 2023-2024 report, the EO stated that a lack of signposting contributed to lower levels of complaint reporting than expected: the EO "deal[s] with less than a third of the disputes that we should do"²⁸. 2022 Data from Consumer Action Monitor, indicates that the main boundary to people lodging a complaint was that it wasn't seen as worth the hassle²⁹. Yet, our research has also shown that well-handled consumer complaints have a positive impact on overall consumer satisfaction, and that a well-managed customer complaint can lead to higher customer satisfaction than if no problem had ever occurred³⁰. This is believed to be because effective complaints processes demonstrate supplier responsiveness, customer care and fairness. Conversely, a badly managed complaint is worse for consumer satisfaction than if the consumer had had no engagement with the complaints process at all.

More accurate data recording of the details of the complaint and timely communication of the complaints process by suppliers can ensure that consumers are signposted to independent advice and redress at appropriate stages of the complaint journey. A GSOP related to this could be effective in increasing awareness of consumer rights around complaints, reduce confusion of the complaints process and make the process faster and easier to navigate.

The Government recently consulted on changes to the complaints process, including scope for more automatic referrals of cases to the EO. This would heavily rely on complaints being recorded in a timely way, and closed appropriately, to ensure that referrals are being offered at the right time. A GSOP

²⁶ The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008, PART II, sections 4, 5 and 6

²⁷ [Energy Ombudsman Reports 24% Drop in Complaints](#), May 2025

²⁸ Energy Ombudsman, [ADR Annual Report July 2023 - June 2024](#)

²⁹ Trust Alliance Group, [Consumer Action Monitor 2023](#)

³⁰ Citizens Advice and Ofgem, [What drives consumer satisfaction with energy suppliers?](#), July 2025

could apply where complaints are retrospectively added by suppliers which should have been recorded at the first point of contact by a consumer.

Proper recording and processing of complaints is equally important for non-domestic consumers. Businesses are time and resource-poor, which means they often will avoid making complaints to their energy suppliers when they experience poor service, due to a perception in the market that it is too difficult or time-consuming to make a complaint. This means that poor practice in the non-domestic market often goes unrecorded³¹. Therefore, making the complaints process as easy as possible is vital, and introducing a mechanism that increases the timely signposting and issuance of deadlock letters by suppliers, would assist with this.

As outlined in our response to DESNZ's consultation on "Fairer, Faster Redress in the Energy Market" we agree that penalties should be levied where suppliers fail to implement an Ombudsman remedy in the designated timeframe without a valid exemption. Between July 2023 and June 2024, almost 10% of remedies confirmed by the EO were not implemented by suppliers within 28 days, and there was a similar rate of non-compliance the previous year. However, to improve consumer confidence we recommend that the EO should be able to levy penalties in these instances, and that this would be preferred over the introduction of a GSOP.

- **Ensuring compliance with pre-payment meter (PPM) installation processes and onward monitoring (SLCs 27A.1, 28.2, 28.4, PPM Guidance (Safe and Reasonably Practicable) and involuntary PPM - supplier code of practice³²):**

Following the past scandal around force fit PPM installations³³, the subsequent investigations into supplier behaviour, moratorium on involuntary installations throughout 2023, and the announcement of compensation for those households that had a PPM installed without their permission, Ofgem has strengthened the rules for suppliers to follow when installing PPMs without consumer consent.

Ofgem's involuntary PPM code of practice sets clear expectations for suppliers on when it is acceptable to forcibly install a PPM and the safeguarding steps that must be taken prior to installation. It also establishes expectations for the

³¹ Citizens Advice, [Small and micro businesses experiences of the energy retail market](#), March 2025

³² Ofgem, [Involuntary prepayment meter energy supplier Code of Practice](#), April 2023

³³ The Times, [Exposed: How British Gas debt agents break into homes of vulnerable](#), February 2023

monitoring of those clients to keep track of incidence of self-disconnection, to offer appropriate support and to assess whether it remains safe and reasonably practicable for that consumer to have a PPM. Ofgem has also released guidance for all prepayment meters (voluntary and involuntary) and the interpretation of Safe and Reasonably Practicable (SRP), outlining relevant factors indicating whether it is safe to install a PPM³⁴. This guidance includes a “Do Not Install” involuntary PPM requirement for households with specific needs. These guidelines have been incorporated into SLC 28.4. This is very welcome and, when adhered to, ensures a reduction in the number of PPMs installed in households where the impact of self-rationing or self-disconnection is severe and dangerous.

In January 2024, most suppliers were able to resume forcible PPM installations so long as they complied with the abovementioned guidance³⁵. Citizens Advice anticipates that, in readying themselves to re-commence involuntary PPM installations, suppliers would have put in place certain internal safeguards and record-keeping mechanisms to ensure adherence. Therefore, we suggest that Ofgem consider the introduction of a GSOP related to supplier compliance to SLCs 27A.1, 28.2, 28.4 and where they are not followed - in terms of SRP assessments, the identification process for involuntary PPM, adherence to the do not install categories, and post-installation aftercare and monitoring - compensation is issued to the consumer.

We believe that the introduction of automatic compensation in this area aligns with Ofgem’s decision to award compensation to those consumers that had a prepayment meter installed without their permission between 2022 and 2023³⁶. It would reinforce the commitment to maintaining consumer protections in this area, and prevent future detriment to some of the most vulnerable consumers. The Energy Consumer Satisfaction Survey (2025)³⁷ found that 40% of PPM users are vulnerable, compared with 27% consumers overall; 52% PPM users are on the Priority Services Register (PSR) compared with 38% consumers overall; 49% PPM users have mental health problems, compared with 36% consumers overall; 26% PPM users have children aged under 5, compared with 13% consumers overall.

It is possible that suppliers have not yet introduced a data recording system that accurately and systematically records the steps taken to assess customers

³⁴ Ofgem, [PPM Guidance \(Safe and Reasonably Practicable\)](#), September 2023

³⁵ Ofgem, [Check energy suppliers that can install prepayment meters without household permission](#)

³⁶ Ofgem, [Compensation for involuntary installation of prepayment meters, 1 January 2022 to 31 January 2023](#), April 2024

³⁷ Ofgem, [Energy Consumer Satisfaction Survey: July to August 2025 summary](#), October 2025.

moving onto PPMs and for involuntary PPM installations. In those instances, we recommend that suppliers implement such systems to ensure compliance with the guidance and SLCs. This record-keeping will also make monitoring and ongoing support to customers easier, and thus facilitate compliance of SLCs 27A.1 and 28.2. Additionally, these records would enable suppliers to provide key information surrounding consumers' circumstances to debt collection agencies and magistrates, and would specifically enable more informed decision-making by magistrates' courts reviewing involuntary PPM warrants.

Finally, as Ofgem considers reforms to the GSOPs and the wider regulatory framework, it is important they anticipate and mitigate the risks posed by the **net zero transition** and the drive to decarbonize homes. A GSOP may be a suitable tool to establish minimum standards for suppliers and to protect consumers as the market evolves. This could include processes to remove gas metering and enable export from smart technology.

Design

Research into the efficacy of fines in decreasing undesired behaviour has found that they can have a counterproductive effect, leading to an increased rate of the prohibited behaviour³⁸. This research - though not specific to the energy sector or the GSOPs - found that the manner in which fines are framed are integral to their efficacy in creating a deterrent. Fines framed as retributive rather than compensatory were more effective in reducing problematic behaviour, when framed retributively, the behaviour becomes seen as a moral transgression that should be condemned and corrected. Moreover, when fines are issued publicly it creates a degree of external scrutiny, augmenting the sense of moral transgression which can amplify and encourage behavioural change. Ofgem should consider this when reviewing the GSOP payment methodology to ensure it is having the desired effect.

We **welcome the opportunity to review the current GSOP payment level**. We are concerned that the current payment level (£40 as of January 2025) does not reflect consumer expectations, and that it does not act as an incentive for supplier improvement. Rather it is feasible that suppliers are willingly absorbing the £40 as a standard cost of doing business - that taking the steps necessary to adhere to the GSOP would cost suppliers significantly more than the GSOP compensation itself. However, it is also important that the GSOP payment level does not become so costly that it

³⁸ Kurz, Tim; Thomas, WE; Fonseca, Miguel A. (2014). [A fine is a more effective financial deterrent when framed retributively and extracted publicly](#), University of Exeter. Journal contribution.

adversely impacts energy bills, supplier's financial resilience or their ability to invest in and test out innovative products and tariffs.

We therefore recommend that Ofgem engage with consumers to explore their satisfaction with the payment levels and its fairness, as getting this right will likely have an impact on consumer satisfaction. We further recommend that Ofgem work with suppliers to review the payment level to set it sufficiently high so that suppliers are encouraged to take active measures to reduce the number of GSOPs they violate. Any changes to the payment level must also go hand-in-hand with the introduction of monitoring and compliance to review and improve supplier performance.

Citizens Advice also believes that **introducing repeat payments** where a supplier fails to adhere to GSOPs is ongoing would be useful in incentivizing them to swiftly resolve problems, and minimise consumer frustration and harm. In instances where the GSOP continues to not be met, we recommend the introduction of repeated compensation payments every three months until the situation is corrected.

Furthermore, we believe it is important that when issuing the compensation to consumers, suppliers are transparent in stating that it is not a good-will gesture, rather it is a legal requirement as a result of failing to meet a required standard of service.

We also **recommend that Ofgem establish inflation-linked automatic changes** to ensure the value is regularly reviewed, that the GSOPs continue to be meaningful and to prevent future burdensome consultations.

We are **hesitant about the idea of introducing variable payment levels** (linked to either potential consumer harm or consumer type), as this would add complexity to the GSOPs that would reduce their automated nature, and require a level of investigation that may be lengthy and onerous. However, we recognise that if GSOPS were introduced for heat networks, segmented payments based on the size of heat networks may be required³⁹.

Finally, we agree with Ofgem's suggestion in the call for input that now would be an appropriate time to **review the exemption to the existing GSOPs for meter faults** (paragraph 3.16). Where a supplier is notified that a consumer is off-supply outside of working hours, the time period in which a supplier must investigate and/or fix the fault

³⁹ [Citizens Advice response to Ofgem and DESNZ's joint consultation on implementing consumer protections for heat networks](#), January 2025

should start immediately, reflecting Ofgem's April 2025 decision to require suppliers to be contactable outside of regular hours when there has been a loss of supply⁴⁰.

Operation

It is currently unclear what types of data - and at what frequency - is collected from suppliers by Ofgem. There is no publicly available data on supplier compliance with existing GSOPs, and the data included in the call for input (paragraphs 1.15 and 1.16) only states total number of breaches of the standards and the total value of the automatic payments made between 2022-2024. There is no breakdown of this data included in the call for input - by individual supplier or by individual GSOP.

Consequently, it is difficult to analyse the impact that the existing GSOPs have had on consumers and the wider market. It is also challenging to scrutinise whether suppliers are meeting the minimum standards or review whether specific GSOPs are more frequently violated than others and therefore need targeted intervention. **It would be beneficial for Ofgem to provide greater clarity around the data that it currently gathers from suppliers, the level of engagement and analysis of that data, and examples of any enforcement action taken by Ofgem for non-compliance.**

Furthermore, it is unclear whether this level of analysis is being conducted by suppliers themselves. The intention of the GSOPs is to set minimum standards of performance and minimise incidence of consumer harm. However, no target or parameters for acceptable supplier action has been established and it is unclear whether suppliers are actively monitoring their own performance to identify areas of concern, implement corrective measures, and track their impact on improving performance.

For the GSOPs to have their intended effect - establishing minimum standards of supplier behaviour and responses, as well as a reduction in incidents of consumer detriment - it is vital that minimum standards are actually set via annual targets by issue and supplier (grouped according to size). It is also necessary that there is scrutiny of performance and that when those targets are repeatedly missed there is some accountability - we recommend **regular tracking of GSOP performance by Ofgem and that investigations and enforcement action are undertaken by the regulator**, particularly as high levels of GSOP non-compliance could point to broader issues and risks that would adversely affect consumers.

Going forward, we recommend that **data is gathered from suppliers by Ofgem on a quarterly basis**, and that it can be disaggregated by issue, thus enabling comparative

⁴⁰ Ofgem, [Consumer Standards: Supplier 24-7 Metering Support](#), April 2025

analysis across suppliers and individual GSOPS. This **data should be made public on an annual basis** alongside an analysis of trends and issues, comparative supplier performance and recommendations for intervention that would lead to reductions in consumer harm.

We agree that the GSOPS can be a powerful tool in building consumer trust and confidence and can help to facilitate greater consumer engagement and a more competitive and dynamic market. However, we emphasise that this can only be achieved if there is more awareness of the GSOPS, and of supplier performance against them.

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