Sustainability First – Strawman

Gas Disconnections: early steps to improve the customer journey

Introduction

Our work on the future of gas distribution has highlighted how **varying approaches taken by gas networks and by energy retailers to gas disconnections is a cause of customer confusion and risks detriment**[1]. Ofgem, GDNs, energy retailers and the consumer bodies all agree that present arrangements for gas disconnections are no longer fit-for-purpose

Ofgem is reviewing current routes to a gas disconnection with a view to **developing an enduring disconnections framework**, including associated costs and charges. **The issues are cross-cutting and complex and will take time to resolve.** This includes how best to achieve broad agreement on what 'fair' might look for future allocation and recovery of the costs of gas network disconnections once these arise at scale. This links inevitably with DESNZ's broader work on gas network investment and cost recovery.

Given customer confusion and potential detriment, we have produced this **'strawman'** to suggest **'quick wins' and early steps to improve the present customer journey on gas disconnections.**

Our thinking has three elements :

1. **As an immediate priority, to improve customer communications about present routes to gas disconnection.** This could be delivered in months not years.

2. **Other short-to-medium term actions to help deliver a better customer journey.** Pending development of a more enduring disconnections framework, these actions would be part of the Ofgem 'status quo' Option 1.

3. **Identify further steps needed <u>now</u> to build evidence and to inform thinking on an enduring disconnections framework.** The immediate priority is to agree what further actions are needed <u>now</u> - and who will take them forward**.**

Below, we outline thinking on each.

1. Immediate improvements to customer communications about the routes to gas disconnection

There is an urgent need to improve existing communications to customers about the two routes by which they can request disconnection from the gas network – 'voluntary' and 'safety' – and to explain clearly that different costs will arise with each.

In its Summary of Responses on the Disconnections Call for Input (Sept 2025) Ofgem says "*We discovered that current consumer guidance and support tools for disconnection processes are inconsistent, inadequate and vary significantly across the industry",* noting that *"clear and consistent information is critical to enabling consumer choice".*

[1] See Annex for links to Sustainability First papers on future of gas distribution / gas disconnections

An exploration of online advice forums[2] indicates the difficulties customers experience in navigating through current arrangements - with the risk of some ill-informed customers being channelled down the voluntary route and incurring significant costs. As a fuel poverty charity highlighted in a recent meeting[3], many more vulnerable and low-income households will be able to get heat pumps under the Warm Homes Plan and it is therefore vital that they are able to navigate through the gas disconnection process and in so doing do not face unexpected additional costs.

While the focus of Ofgem's work so far has been on the GDNs it is crucial that throughout the journey the customer receives clear and consistent advice. Most customers wishing to cease their gas supply will initially talk to their supplier – most do not know who their gas network is. In our view there are therefore **three immediate strands of work required here**:

1.1 Clear and consistent messaging from the GDNs
1.2 Clear and consistent messaging from suppliers (including on supplier charges)
1.3 Clear and consistent messaging from statutory bodies, consumer advisers and other sources, as part of improved advice on heat de-carbonisation.

1.1 Clear and consistent messaging from the GDNs

As at 9 March 2026, only one of the four GDNs indicate clearly via their website that a customer should *first* start their disconnection journey by contacting their energy supplier to discuss removal of their meter as a 'safety' disconnection – and for which there may be no network charge – albeit perhaps a supplier charge. By contrast, three GDN websites directly take the customer into an online process for 'voluntary' disconnection, explaining that there will be a network charge.

The text on the website of Wales and West Utilities offers a good model (see box overleaf) :
WWU – https://www.wwutilities.co.uk/services/gas- connections/disconnect/

The gas trade-body, Future Energy Networks (FEN), uses the same basic text as WWU. But few gas customers who wish to disconnect are likely to view that site in practice[4]. Underscoring a general need for clear communication all-round, GDNs refer to a 'Service' disconnection on their websites – rather than the term 'Voluntary' disconnection which is used by Ofgem.

As an immediate priority, all GDNs should adopt standard text and advice that sign-posts customers seeking a disconnection to first contact their energy supplier. This can readily be done by making use of the WWU / FEN text. Ideally this should extend to all gas transporters, but this may prove more complex.

[2] Advice-forum threads : For example, see reddit and moneysavingexpert
[3] NESO. Consumer considerations for the gas market transition. Virtual roundtable. 5 March 2026.
[4] Future Energy Networks - https://www.igem.org.uk/future-energy-networks/disconnecting-from-the-gas-network.html?_gl=1*ckihrq*_up*MQ..*_ga*MTUyODA5NTIyNC4xNzcxNTgzNzU1*_ga_XGTKMFQ7M3*czE3NzE1ODM3NTQkbzEkZzEkdDE3NzE1ODM3NjYkajQ4JGwwJGgw

Wales and West Utilities - Text on Gas Disconnections
https://www.wwutilities.co.uk/services/gas- connections/disconnect/

'Disconnecting from the gas network

If you would like to disconnect from the gas network, you should contact your energy supplier. Your energy supplier will arrange for your gas meter to be removed. If you also need the gas pipe leading to your property removed, you should contact your gas distribution network operator but there may be a charge.

***You will typically deal with two companies**.*

*Your **energy supplier**, which is the company that bills you for the energy you use.*

***Wales & West Utilities** is the company that maintains the gas pipes in your area. This company is different and separate to your energy supplier.*

Removing your gas meter

- *You will no longer pay standing charges*
- *You will no longer pay for gas usage*
- *Your gas meter will be removed*

The pipe carrying gas to your property might remain

*You can contact your **energy supplier** (the company which bills you for your gas) to end your gas supply contract and request removal of your gas meter. Some energy suppliers may charge for this service, but many offer the service free of charge.*

Your energy supplier will arrange for the gas pipe to be sealed (known as 'capped') at the emergency control valve. The emergency control valve is normally found inside a meter box or inside your home. The capped gas pipe will still be live but you will no longer pay standing charges or for gas usage.

If a new gas meter is not fitted within 12 months, Wales & West Utilities will contact the property owner. If the pipe is no longer needed, the gas distribution network operator might carry out additional work to determine if the pipe needs to be removed too.

Pipes made of metal will usually be disconnected unless they supply gas to your neighbours. We may leave plastic pipes in place and live if there is no risk of corrosion, and they may be required in the future. If the pipe is disconnected, it will be disconnected as close to the gas main as possible and more than 12 months after the meter is removed by your energy supplier.

Wales & West Utilities will not charge for this type of disconnection. However, you will need to check if your energy supplier will charge you to remove the gas meter. You can find their contact details on your energy bill.

Removing the gas pipe

You might need this service if you are carrying out building work or substantial renovation / demolition work.

The pipe carrying gas to your property will be removed and this work will be chargeable

If there is a gas meter at the property, you must first contact your energy supplier to end the gas supply contract and arrange for the gas meter to be removed.

Wales & West Utilities will not disconnect pipes and equipment until the gas meter has been safely removed by your energy supplier.

Working near gas pipes must be completed by a competent person and your gas supply pipe must never be built over. Rules and regulations apply during any type of building work, these prevent building work on or close to the gas pipe.

Our Dial before You DIG pages give advice on how to dig safely near gas pipes and equipment. It's a criminal offence to damage a gas pipeline and it is your responsibility to make the necessary enquiries before starting work.

Complete our application form for a service disconnection'.

1.2 Clear and consistent information from energy suppliers (including on supplier charges)

A clear explanation of the customer journey

If suppliers are expected to be the initial point of contact for customers wishing to disconnect from the gas supply (and GDNs are pointing them there) then it is essential that they understand and can explain the two routes. The Octopus website[5] provides a good example of how this could be done. Of the supplier websites we looked at, Octopus was alone in providing good accessible information[6]. The Ovo Energy Forum[7] includes some helpful information - but advocates 'keeping your meter in case you change your mind'. British Gas includes brief accurate information but this was very hard to find (under new connections)[8].

As well as including basic information on supplier websites it is important that their customer service agents are equipped to give the right advice. In one advice forum thread (noted above) an Octopus agent was giving incorrect advice to the customer (sending them back to the GDN) in contradiction of their own website advice.

Ofgem should share the GDN agreed text with all suppliers and ask suppliers to ensure that the advice they provide to their customers is consistent with that - and also require this basic information to be included on supplier websites.

Transparent supplier information on their charges for meter removals

For our response to Ofgem on gas disconnections for their CfI[9] we looked at some supplier websites to get a better feel for their charges for meter removals and found these to vary widely (e.g Octopus – no charge; Ovo - £106), with information generally hard to find. The Ofgem call for input on a review of the gas disconnections framework (January 2025) and the Ofgem summary of responses (September 2025)[10] focus on gas transporters but do not address supplier charges. So far as we are aware, there is no readily available information to which customers can refer about how different suppliers might charge them for removal of their gas meter for a Safety disconnection.

Ofgem should require all energy suppliers to make information available via their websites about their customer charges and other arrangements for meter removal.

---

[5] https://octopus.energy/blog/disconnecting-your-gas-supply/
[6] The Ovo Forum includes that customers
[7] https://forum.ovoenergy.com/bookings-appointments-186/thinking-about-removing-your-gas-supply-here-s-some-advice-tutorial-9166
[8] https://www.britishgas.co.uk/energy/new-connections.html#:~:text=If%20you%20have%20electric%20heating,pay%20standing%20charge%20for%20your
[9] Sustainability First - Gas Disconnections - Response to Ofgem CfI - February 2025
[10] https://www.ofgem.gov.uk/sites/default/files/2025-01/call_for_input_disconnections.pdf
https://www.ofgem.gov.uk/sites/default/files/2025-09/summary-of-responses.pdf

1.3 Clear and consistent messaging from statutory bodies, consumer advisers and other sources, as part of wider advice on heat de-carbonisation.

Also as a priority, common text about customer routes to gas disconnection and related charges should be agreed and clearly communicated via the websites of Ofgem, Energy-UK, Citizens Advice and other organisations that give energy advice.

More generally there is **an urgent need to improve the information that is available to consumers about future heat choices and the full 'customer journey' in making the switch from gas to electricity for heat and also cooking.**

Customers urgently need better independent support and information in order to obtain a full upfront picture about all likely steps - including possible additional cost-points (1) in understanding the extent of electrical upgrade work that they may need within their home to connect a heat pump, electric water heater and / or an electric cooker (i.e. possible upgrade to in-home electrical circuits, consumer switches etc) – and (2) in deciding to go ahead with their gas disconnection. These steps and costs must become well-understood and transparent to enable a good consumer experience on heat decarbonisation – whether for those who may be 'early adopters' – or in the long-run for everybody else. Unexpected costs - or in-home disruption - risk detracting from the customer journey and also risk giving the heat-pump transition a bad name[11].

We welcome commitment in the DESNZ Warm Homes Plan[12] to establish a Warm Homes Agency to guide consumers through the transition. However, we note that no mention is made of gas disconnection as a part of that journey. Equally the Scottish equivalent (Home Energy Scotland) makes no reference. **It is vital that in providing advice to customers on heat decarbonisation, gas disconnection is covered.**

For many customers a key source of advice will be the heat pump installer. The Warm Homes Agency, working together with the private sector, should ensure that clear and consistent information on gas disconnection is provided to heat-pump installation trade bodies for onward communication to individual heat-pump installers.

2. Other short-to-medium term actions to help deliver a better customer disconnection journey under the present framework

Below we outline other possible short-to-medium term actions which could help improve the customer disconnection journey under Ofgem's 'status quo' Option 1. These may require action from Ofgem, DESNZ, GDNs or other gas-sector actors, the energy suppliers and consumer bodies. On certain of these actions we do not wish to understate the effort required – but we view these as steps which could improve the current customer experience ahead of an eventual enduring disconnections framework. **The immediate priority is to agree which of these actions – or indeed others - merit being taken forward, with timescales and lead responsibility, creating a clear work plan.**

[11] For households aiming for home-electrification – as well as electrical upgrade costs in-home which may arise from a switch to electric heat, hot-water and cooking - it is also important for other costs of electrical works in-home to be understood e.g. for an EV charger, PV, battery.

[12] https://assets.publishing.service.gov.uk/media/696f8a3ec0f4afaa9536a0c4/warm-homes-plan-standard-print.pdf

2.1 Ensuring that GDN and supplier charges are efficient and fair

While Ofgem has collected detailed cost information through its Request for Information to GDNs and IGTs, it is clear that there is still a poor understanding of what drives these costs and how far they are efficient. To date no information has been collected on supplier charges. Getting a better handle on these costs and charges is key to ensuring customers are treated fairly under the current framework and to inform thinking around the enduring framework.

For GDNs - Ofgem has included a volume driver for safety disconnections in GD3 licences but the **unit costs vary significantly between licence areas.** For Simple Disconnections they range from £132 in London (Cadent) to £245 for NGN. For Complex Disconnections they range from £693 for NGN to £1812 for Southern (SGN). This huge disparity suggests the GDNs may be taking different approaches to how they handle / categorise disconnections, as well as having potentially different levels of efficiency. Moreover, changes in these unit rates since GD3 final determinations reinforces our view that these costs are not well understood[13]. **The information collected on an ongoing basis as part of the price control (on both volumes and costs) should help shed more light on this area and also help in understanding the regional differences in charges for voluntary disconnections.**

In the meantime, the Ofgem RFI (request for information)[14] to the gas networks may provide further insights on the costs of voluntary and safety disconnections today as well as highlighting information gaps. We would very much hope that this information will be made available also to DESNZ.

On the supplier front - we have highlighted above the differences that exist between suppliers in the charges they levy for meter removal. As DESNZ stated in their response[15] to the Select Committee looking at the energy cost crisis "*Whether or not to charge customers to [remove the meter] is a commercial decision for suppliers and several do not charge customers for this service. We would expect that where a consumer wishes to have their meter removed and supply capped, their supplier will do so promptly and at the lowest cost possible.*"

We would encourage further work by the Ofgem Retail team / DESNZ to track and understand these supplier charges for meter removal. In particular we would note that these costs will cover both the Early Termination Fee levied by the Meter Asset Provider as well as the work to remove the meter and cap the supply. As an example, one MAP[16] quotes over £400 as the early termination fee for a smart meter removed after 3 years in situ. **Supplier charges thus have the potential to be a significant element of cost and need to be better understood by Ofgem and DESNZ**.

[13] GD3 Final Determinations – Table 14. Para 4.81 - https://www.ofgem.gov.uk/sites/default/files/2025-12/RIIO-3-Final-Determinations-GD.pdf

[14] https://www.ofgem.gov.uk/call-for-input/request-information-gas-disconnections-framework-review. August 2025 - closed 5 October 2025

[15] https://committees.parliament.uk/publications/51129/documents/283592/default/ - Govnt response to Recs 18 & 19. Pp 12-15

[16] https://www.energyassetsnetworks.co.uk/wp-content/uploads/2021/04/Metering-Charges-Statement-2021-Final.pdf

2.2 Understanding the customer perspective

We understand that new customer research from Citizens Advice on the home decarbonisation journey should conclude in Spring 2026 which is welcome. The findings should help improve understanding of the main issues in today's customer journey on heat decarbonisation, including on gas disconnection. This will enable customer communication to be improved and better targeted in the near term. It may also point to other areas where action is needed to improve the customer journey under the current framework - as well as informing thinking about the enduring solution.

That said, this initial Citizens Advice research is understood to be with a relatively small sample. Following publication of their research, **thought should be given to further customer research** to fill remaining gaps about the customer journey - including to better understand cooking as a driver for retaining gas; and also to explore customer-thinking around the pros- & cons of keeping options open by retaining their gas connection.

2.3 Streamlining the disconnections process in the interim

One of the quirks in the current process is the 12 month delay between the supplier removing the meter and the GDN finalising the required safety work. From the customer perspective this delay is hard to justify and subsequent contact from the GDN can come as a surprise. **Clear supplier communications can help but further work would be of value to look at how best to manage this within the current framework**.

For safety disconnections which a customer initially triggers with their gas supplier, GDNs currently have insufficient knowledge of the under-lying customer intention – i.e whether the disconnection is permanent or only for a limited period. **The GDN therefore has no insight into appropriate timing on contacting the customer to schedule GDN work for final disconnection / removal of the gas pipe. One short-term 'win' might therefore be for Xoserve to add a specific new data-field(s) on the reason given by the customer for the gas disconnection request**. This in turn might help improve GDN handling of their part in safety disconnections. We are aware GDNs see this as potentially difficult and also costly – especially while other system/data changes are in train. Nevertheless, alongside relevant code changes to improve on current data flows between suppliers, shippers and GDNs, this step should be properly considered as a way to improve GDN handling of the customer safety disconnection journey.

While the GDN statutory obligation only kicks in after the 12 month period has elapsed, there is no reason why GDNs could not do the work sooner if they knew that the disconnection was permanent and the GDN was clear that the supplier was not going to do it. **Ofgem would need to confirm that this would count as a safety disconnection under the GD3 volume driver but it would presumably enable the GDNs to schedule the work more efficiently.**

GDNs should also consider whether there is other information (such as meter location – internal or external) that would be helpful to them in delivering a better customer journey, and that suppliers might be able to provide.

3. **Identify further actions needed <u>now</u> to build evidence and to inform thinking on an enduring disconnections framework.**

As noted, **decisions around an enduring framework are difficult and will take time**, including because of their dependence on the wider DESNZ work on the future of gas[17]. This said, **there is important early evidence-gathering and thinking to be done <u>now</u> to inform and aid that process. Some of the near-term actions to improve the customer journey noted above will also help longer-term thinking. There are also other actions that should be taken forward <u>now</u> - but which are more targeted on the longer-term framework decision. The immediate priority is to agree what further actions are needed - and who will take them forward.**

3.1 Greater clarity on the trajectory for gas disconnection charges

Building on the work proposed at 2.1 to better understand current unit costs for the GDNs, **more work is needed to establish a full and transparent picture on future gas disconnection costs and charges to inform any future discussion around cost-socialisation, including how urgently such thinking needs to be progressed**.

Modelling undertaken for Citizens Advice in their October 2025 report - 'The Great Grid Switch-Off' suggested extremely high costs in the early 2040's associated with customer gas disconnections at scale and so to a conclusion that continued socialisation of these costs could prove prohibitive as gas customer numbers declined (and that these costs might therefore require tax-payer funding). It is however important to note that the extremely high costs headlined by the Citizens Advice paper arise after 2040. In contrast, Ofgem's September 2025 report[18] indicates that only ~21,500 customers disconnected from the gas networks in 2024. Of these, 23% - so just over 5,000 customers - self-paid as voluntary disconnections – with the remaining ~16,000 customers having their network disconnection costs socialised across the full gas-network customer base. Such low disconnection volumes represent a small sum in terms of cost-socialisation today – perhaps £11.5m in 2024[19] – and on this basis we have concluded that while socialisation of disconnection costs will need addressing at some future point it is not an urgent consumer matter today - and possibly not material until the end of the GD4 period (2036). Government wishes to encourage heat pump uptake and premature steps to seek individual customer contributions towards the network element of a 'safety' gas disconnection (when considered too alongside supplier charges) may serve to discourage this.

More robust cost information should therefore help inform future estimates of cost trajectories for gas disconnections. It should also enable a better-informed discussion than is possible today of the trade-offs involved in how best to meet the costs of gas disconnections at scale while at the same time encouraging heat decarbonisation and also ensuring vulnerable gas customers are protected from shouldering excessive costs.

---

[17] https://www.gov.uk/government/publications/midstream-gas-system-update-to-the-market

[18] https://www.ofgem.gov.uk/sites/default/files/2025-09/summary-of-responses.pdf
see paras 1.7 (reported current GB average disconnection costs) and 1.9 (reported current disconnection volumes)

[19] ~ £11m in GDN revenues from 5,300 Voluntary disconnections (at GB avge cost of £2,053) but noting that a significant proportion of these will remain voluntary, linked to building works etc

3.2 Exploring a 'Disconnection-Lite' model

We would encourage early discussion among relevant parties (HSE, Ofgem, DESNZ, GDNs, energy suppliers) about the pros & cons of leaving the gas meter in situ – and <u>not</u> immediately disconnecting the gas supply. This approach could offer significant optionality to both gas customers and to the gas networks. For example, it would provide customer flexibility, including for subsequent tenants or householders, noting anecdotally that some home-owners may have a concern about their property value once a gas supply is permanently disconnected[20]. For GDNs, leaving the gas meter in situ could reduce the overall costs of gas disconnection by allowing them to programme the work (rather than it being piece-meal as now) and potentially open the way to street-level or place-based approaches to gas disconnections, including as part of any wider decommissioning strategy.

Consideration would also be needed on the gas standing charge[21], including the potential for some form of 'discounted' standing charge where a customer formally commits to no gas offtake. Confirmation is also needed from Ofgem on the status of its historic guidance on waiving the standing charge for vulnerable households with zero consumption. All of which would also need tying into the Ofgem cost allocation and cost-recovery review.

GDNs are concerned that leaving a gas supply connected may increase gas theft. While there are major safety considerations regarding gas theft, whether leaving the meter in situ truly increases the risk of theft and how this might be mitigated needs proper consideration.

This is a complex issue but understanding the pros and cons of a 'Disconnection-Lite' approach could be helpful in advising customers about their options in the near term as well as shaping the enduring framework.

3.3 Making the links to a more planned approach to heat transition

NESO and the RESPs – with the gas and electricity distribution networks together at the table – need an early discussion regarding more 'planned' approaches to local heat de-carbonisation – including the potential over time for greater use of biomethane in particular areas. This relates closely to developing a better understanding of the pros and cons of leaving customer gas connections in place discussed at 3.2 above. We were therefore pleased to note a new NESO data-sharing agreement with Xoserve[22] relating to improving approaches to regional and place-based energy planning. Xoserve cite this as a means to : '*grounding RESPs in real-world gas demand, enabling NESO to develop more accurate, locally tailored energy*

[20] See, for example, this thread - https://forums.moneysavingexpert.com/discussion/6102910/gas-disconnection

[21] In Q1 2026 the gas standing charge under the price cap for a standard variable tariff is 35.1p/day for a direct debit household customer. In contrast to the electricity standing charge, the gas standing charge recovers no gas network costs which are recovered instead via the unit rate. Under the price cap, 65% of the cost allowance for the gas standing charge is attributed to 'core operating costs and industry charges' (by which we assume supplier and meter-related costs and charges) – https://commonslibrary.parliament.uk/research-briefings/cbp-10339/

[22] 17 February 2026. Xoserve - https://www.xoserve.com/news/xoserve-and-neso-forge-strategic-data-partnership-to-accelerate-uk-s-ambition-for-net-zero-and-clean-power-by-2030/

strategies…and consolidating previously fragmented, regionally sourced datasets… making whole-system planning simpler, faster and more cost-effective'.

3.4 Piloting how an integrated heat decarbonisation journey might work

Recognising that the customer journey for heat decarbonisation may involve both a heat pump installation and a gas disconnection we would advocate **setting up a practical innovation project on 'local integration' of the customer journey on heat decarbonisation – spanning gas disconnection / in-home electricity upgrade work / and DNO un-looping, connection** & **reinforcement process.** This could be on a street or an area basis – designed to establish efficient approaches to GDN disconnection and also to better understand sequencing of both customer and DNO steps and process. GDNs have indicated they struggle to establish this kind of practical coordination with DNOs. The RESPs will need the 'lived experience' which this kind of practical innovation project could demonstrate in order to help realistic development of the RESP regional energy plans.

We note that the recent Ofgem consultation on the role of DNOs in LCTs and energy efficiency[23] includes a proposal for pilots of the DNO Extended Role (if Ofgem decide such a role is appropriate). **As a part of this we were pleased to see the references to GDN involvement and would actively support such pilots.**

3.5 Clarifying timeframes for related workstreams

Ofgem and DESNZ should clarify timetables for their respective reviews on Cost Allocation and Recovery. The outcomes are essential to informing thinking on managing future gas disconnection costs at scale. On interaction with government's work to consider the future of the gas system Ofgem state[24]: *'In particular, the government's upcoming call for evidence on network investment and cost recovery will seek views on options beyond accelerated depreciation to support the fair and equitable recovery of costs given a declining gas consumer base. This includes considering further the issue of perceived asset stranding and investor confidence. Government has acknowledged the importance of providing clarity and aims to determine its policy ahead of RIIO-4*'. **We are fully agreed that the initial two-year 'window' of GD3 represents a critical period in which to kick-off the right work packages and to start to address some of these fundamental matters of long-run principle**.

Building on this, there is an increasingly pressing need for **a better line-of-sight on the eventual road-map of steps and actions by government and other main actors on fossil gas phase-out**. We would look to this being a main outcome following the upcoming calls for evidence by government on network investment and affordability, and on transitioning the gas system.

[23] https://www.ofgem.gov.uk/sites/default/files/2026-03/DNOs-future-role-in-supporting-the-rollout-of-low-carbon-technologies.pdf

[24] RIIO-3 Final Determinations Overview (para 7.13) - December 2025 - https://www.ofgem.gov.uk/sites/default/files/2025-12/RIIO-3-Final-Determinations-overview.pdf

Annex : Sustainability First papers on gas disconnection and the future of gas

Our initial focus was on the five-year RIIO-3 gas distribution price-control (2026-2031) – **including the need to look further at the customer journey on gas disconnections and approaches to cost allocation and recovery**.

Here are links to our two papers on gas disconnections :

- **Sustainability First - Commentary on the Gas Disconnections Journey - Nov 2025**
- **Sustainability First - Gas Disconnections - Response to Ofgem CfI - February 2025**

And here are links to our other Future of Gas and related papers :

- **Sustainability First - Future of GB Gas Networks - Looking through the FOG - December 2023**
- **Sustainability First – RIIO3 Sector Specific Methodology Consultation – Response to Ofgem – March 2024**
- **Sustainability First - GD3 Business Plans - Response to Ofgem - February 2025**
- **Sustainability First - GD3 Draft Determinations - Response to Ofgem - August 2025**
- **Sustainability First - Energy System Cost Allocation and Recovery - Response to Ofgem CfI - September 2025**

Judith Ward
Maxine Frerk
Associates. Sustainability First

9 March 2026