



Bulb's response to the proposals to modify licence conditions as a result of Retail Code Consolidation

This document outlines Bulbs response to the *Statutory Consultation on Proposals to Modify Licence Conditions as a Result of Retail Code Consolidation*.

This response is not confidential and can be published on the Ofgem website. If you have any questions, please email archiegalbraith@bulb.co.uk.

Question 1: Do you agree that the proposed changes to the Electricity Supply Standard Licence Conditions will ensure the licence reflects Retail Code Consolidation?

Ofgem should update the language in the Supply Licence to match the Retail Energy Code. In particular we note that Supply License Condition 12 uses the term 'Electricity Theft Investigation' which is not consistent with the REC Unbilled Energy Code of Practice. The REC documentation indicates any suspected 'Energy Theft' should be regarded as 'Unbilled Energy' until the point the investigation has been completed and it is found to be a genuine theft. This takes into account the fact that unbilled energy could be a result of a data error rather than theft, and that much of the current CoPs relate to conduct of investigations before it has been proven that theft has occurred. The SLC documentation should be updated to reflect this and provide consistency across regulatory documentation.

Question 2: Do you agree that the proposed changes to the Gas Supply Standard Licence Conditions will ensure the licence reflects Retail Code Consolidation?

Ofgem should update the language in the Supply Licence to match the Retail Energy Code. In particular we note that Supply License Condition 12A uses the term 'Gas Theft Investigation' which is not consistent with the REC Unbilled Energy Code of Practice. The REC documentation indicates any suspected 'Energy Theft' should be regarded as 'Unbilled Energy' until the point the investigation has been completed and it is found to be a genuine theft. This takes into account the fact that unbilled energy could be a result of a data error rather than theft, and that much of the current CoPs relate to conduct of investigations before it has been proven that theft has occurred. The SLC documentation should be updated to reflect this and provide consistency across regulatory documentation.

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