

30 July 2021

Rachel Clark  
Programme Director  
Switching Programme  
Ofgem  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

Email: [AlisonRussell@utilita.co.uk](mailto:AlisonRussell@utilita.co.uk)

Dear Rachel,

**RE: Switching Programme Significant Code Review: Retail Energy Code v3.0**

Thank you for the opportunity to comment on the above consultation.

Utilita Energy Limited (Utilita) is a smart prepayment energy supplier, specialising in providing an excellent smart service to a previously poorly served market sector. We have been installing smart meters for our customers since 2008, and SMETS meters since 2013. Our portfolio is around 95% prepay customers, and of those approximately 90% have smart meters operating in smart mode.

We broadly agree with the proposals within this consultation and welcome the opportunity to provide our comments to the consultation.

Our response comprises of this letter, the accompanying appendix and a completed spreadsheet in which we set out our comments following a detailed review of the proposed REC drafting and consultation questions. If you would like to discuss any of the points raised, we would be happy to help.

Yours sincerely,

By email only

Alison Russell  
Director of Policy and Regulatory Affairs

## Appendix 1: Utilita's response in respect of the consultation questions

This appendix sets out Utilita's views on each of questions posed in the consultation paper.

**Question 2.1: Do you agree that access to data within the GES should be governed under the provisions of the REC?**

Yes, we continue to believe that having governance relating to data access for both electricity and gas enquiry systems under the REC is beneficial and will lead to simplification and efficiencies within the market.

**Question 2.2: Do you agree that suppliers should be required to de-activate a registration following termination of an RMP within 10 working days? If not, what would be an appropriate timeline?**

Utilita does not agree that a supplier should be required to de-activate a registration following a RMP termination. Our preference would be that this is automatically triggered. We believe the proposed solution includes an unnecessary step that has little benefit.