



**Question 1.1.: Do you agree with the proposed standard licence condition modifications as drafted in Appendix 3 for the Gas Supply Licence?**

Yes, we agree that the majority of the modifications are housekeeping. However, we take this opportunity to raise our concerns with the significant risk attached to unregulated territory concerning PCWs and TPIs as these account for approximately 65% of marketplace switching. E.ON believes that these groups are not currently held to the same level of accountability as suppliers, which may subsequently introduce risk to the customer journey.

A further concern we have is the increased risk associated with misdirected payments if a pre-payment device consumer invokes cooling off following a confirmed switch, we would like to see more prescriptive governance in place for this eventuality.

**Question 1.2.: Do you agree with the proposed standard licences condition modifications as drafted in Appendix 2 for the Electricity Supply Licence?**

As per our answer to question 1.1.

**Question 1.3.: Do you agree with our proposal to modify the five working day switching regulatory backstop by introducing a 5pm cut off on a working day, after which, if a consumer signs up, the start of the five working day period will be counted as the next working day?**

Yes, E.ON agrees with this proposal to modify the backstop as this is in line with the design switching arrangements.

**Question 1.4.: Do you agree with our proposals to measure the start of the grace period, from which Supplier B must continue to supply the customer on the same tariff after the consumer has switched and cancelled, from the point that Supplier B sends notice to the consumer of their options and that the grace period should be 15 working days?**

Yes, E.ON is comfortable with the grace period being set at 15 working days.

**Question 1.5.: Do you agree with our proposals to measure the start of the period over which Supplier A must offer to take a customer back on equivalent terms from the switch date? Do you agree that the period that Supplier A must maintain this offer is 16 working days from the switch date?**

Yes, E.ON is comfortable with the proposal to offer equivalent terms.



**Question 2.1.: Do you agree with the proposed standard licence condition modifications as drafted in Appendix 4 for the Gas Shipper Licence?**

Yes. we agree with the proposed modifications, however we would expect to see changes to shipper reporting and also the way in which shippers are monitored through the PAC, this would need to reflect the fact that shippers are no longer responsible for the obligations which will move under the governance of the supply licence. Therefore, the emphasis should be on monitoring suppliers compliance on those activities.

**Question 4.1: Do you agree with the proposed licence modifications as drafted in Appendix 7 for the Smart Communication Licence?**

Yes, E.ON agrees with the proposed modifications.