



By email only to: [EGPPconsultation@ofgem.gov.uk](mailto:EGPPconsultation@ofgem.gov.uk)  
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## **Pure Planet Response to consultation on changes to Ofgem's Enforcement Guidelines and Sectoral Penalty Statement**

Pure Planet is a 100% renewable electricity and 100% carbon offset gas energy provider, supplying over 250,000 households. Through our award-winning app and WattBot, our AI-powered digital service assistant, we're passionate about using technology to make low carbon energy affordable, accessible and engaging to our Members. We're committed to delivering a Smart and sustainable energy system - including working with Ofgem to strive for a more innovative and consumer-focused regulatory environment.

Pure Planet welcomes Ofgem's intention to streamline the enforcement process and speed up resolution of cases involving supplier non-compliance. As a supplier relatively new to the market, we feel it is crucial that this process is transparent and Ofgem's enforcement activity, from engagement and investigation to penalty, is understood by all licenced parties. This is also fundamental to fostering consumer confidence in the market, and the regulator.

We hope these changes will encourage Ofgem to target specific issues and trends of non-compliance among specific parties, and continue to bolster the industry's reputation overall as one that is open about failings and quick to resolve problems.

In response to this consultation, we are concerned that Ofgem has not sought to consider the bigger picture when reforming the enforcement process by failing to take into account the impact of the increasingly complex and lengthy Supply Licence that it is duty-bound to enforce. To truly enable a responsible and competitive market, it is in Ofgem's gift to ensure the regulations are simple to understand and interpreted consistently by all stakeholders.

Taking one recent significant case of supplier non-compliance, it is clear that the complexity of the regulations was a significant factor that led to customer detriment and suppliers' difficulty in auditing their operational processes. Ofgem's [compliance action](#) with 18 suppliers in March 2021 around failures to offer price protection for customers changing contract was governed by SLCs that are unnecessarily complicated and scattered across the Licence (SLCs SLC 23.6, 24.9 and 24.11). Ofgem should assess the implication of lengthy and complex regulation in the current Licence (now running over 500 pages) as a matter of urgency in order to meet its stated aims of improving the enforcement process and raising consumer protection standards..

We would also recommend that Ofgem develop a 'consistency test' for all future changes to the Licence, to ensure that new conditions are both easily and consistently understood by all parties and are located logically in the licence alongside existing conditions.

We look forward to receiving Ofgem's response to this consultation. Please use the contact details provided if you require further information or would like to discuss our response.

