

Nicola Garland
Head of Delivery, Switching Programme
Ofgem
10 South Colonnade
Canary Wharf
LONDON
E14 4PU

24th January 2022

Dear Nicola,

Re: Statutory consultation on proposals to modify Gas and Electricity Supply Licence Conditions related to the Switching Programme.

Thank you for the opportunity to comment on the Statutory consultation on proposals to modify the Supply Licence conditions related to the Switching Programme.

As part of the review I note that the Supply Licence is proposed to be changed to place an obligation to effect Switching within 5 working days. I presume that the intention is that Non CSS Sites will be excluded from this obligation, and these timescales will remain as is within the Uniform Network Code. There are no intentions to amend the timings of these processes as part of the Consequential Changes for the Ofgem Faster Switching Programme for these very large sites, we would request that the disapplication of the licence change is clarified for these sites.

I note that the licence changes do reflect that in some instances Registration will be mastered under the Uniform Network Code rather than the Retail Energy Code. Given this, I wonder whether it would be more appropriate to reference the 'Relevant Code' in the subsequent sections of Supplier Standard Licence Condition 14 so as not to provide contradictory advice regarding the correct Code to be consulted. I appreciate that the majority of consumers will be covered under the REC, but question whether it is relevant to point those that are not covered by this to the REC. I note that this doesn't impact the function of the Licence so may be the intended drafting style.

Yours sincerely

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