



E.ON response to the Statutory Consultation for the Government Energy Bill Support Scheme.

Thank you for the opportunity to review and provide commentary on Ofgem's draft licence condition proposals for Energy Bill Support Scheme (EBSS).

Whilst we acknowledge the need for Ofgem to share an early draft of the relevant licence conditions, the direction from BEIS is still at a draft stage with important delivery areas yet to be finalised with suppliers. As a result, the current Ofgem proposals are vague, for example, 'there will be a scheme and suppliers will comply', however there is a fundamental lack of detail as to what compliance will look like, leaving this open to interpretation.

The timing of this consultation, running in parallel with BEIS workstreams to define the scheme design and requirements, means there remains a high degree of uncertainty for suppliers in understanding the scheme design and our ability to deliver it. We therefore request flexibility from Ofgem to receive and consider further comments as the outcome of any and all BEIS decisions may impact the licence wording requirements. Ofgem and BEIS will need to work in close partnership to ensure suppliers are set up to succeed by aligning the main requirements, exclusions and expectations in sufficient detail and in a timely manner.

Ofgem has utilised the wording of the expired 2014 Government Energy Rebate licence condition (25D) as a starting point for this drafting. Whilst this approach is sensible, there is a level of prescriptive requirements with regard to supplier communications to domestic customers (including billing information) which has since been replaced by principles based requirements (SLCs 31E to 31H). To avoid unintentionally reintroducing the obsolete prescriptive obligations we believe Ofgem should remove 25.5(c) and (d) from the "Relevant Matters for Standard Condition 25E", as currently drafted and allow suppliers the freedom to communicate to customers regarding the scheme either proactively or retrospectively as they see appropriate. We perceive that this is more in line with the supplier obligations under supply licence to communicate with customers based on their individual characteristics and preferences, which may be different for each of our customer segments and believe suppliers are best suited to achieve this.

For our traditional prepayment customer base, we will be communicating with the customer in writing in order to issue the vouchers and potentially following up with the customer should they fail to cash their voucher. As such we do not perceive that there is value in writing to the customer in addition to this to confirm that they have received the voucher. For our smart prepayment customer base, we will be issuing the £200 directly to their meter, making the customer immediately aware that they have received the reduction. We therefore do not believe further communication is necessary.