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**12/01/2024**

Dear Andrew,

**Re: Reviewing the Consolidated Segmental Statements – Our Final Proposals**

Thank you for the invitation to respond to the statutory consultation on the final proposals for the Consolidated Segmental Statement (CSS). Please find enclosed Good Energy's response.

Good Energy is a supplier of 100% renewable power to homes and businesses across the UK, an innovator in energy services, and an installer of heat pumps. We are working towards a cleaner, greener future by making it simple to generate, share, store, use and travel by clean power. Our ambition is to support one million homes and businesses to cut carbon from their energy and transport used by 2025.

*Opening reflections*

Good Energy continues to be supportive of Ofgem's work to improve transparency in the retail market and welcomes some of the revised positions as part of this latest consultation. Notably, we strongly support the updated position to align the submission timelines to statutory reporting deadlines (9 months).

We also support the revised positions to remove the request to report on 'other activities' as part of the CSS, in addition to the removal of the requirement to audit the CSS. On these points, we appreciate Ofgem taking account of the concerns and feedback raised from the earlier consultations.

*Data requirements*

Having reflected on the draft templates in Appendix 3, we are satisfied that we can provide the revenue splits by domestic and non-domestic for electricity and gas.

However, the proposed requirement to request EBITDA level information split out between domestic and non-domestic for both electricity and gas presents some fundamental challenges.

Ofgem will not be able to reconcile to published statutory accounts, since this information is not separated between domestic and non-domestic portfolios under existing statutory reporting requirements. This will require significant work internally to facilitate, which will present more pressures due to the removal of the previously proposed transition period.

Given that the transition period is seemingly no longer on the table, a more pragmatic approach for the EBITDA level information is to align the requirements to existing statutory reporting, where it is reconciled back to the relevant entity, which in Good Energy's example would be Good Energy Ltd and Good Energy Gas Ltd.

*Impact assessment*

We note that Ofgem considers the previous 2021 impact assessment still valid. In our view, a more recent and updated assessment is still necessary. The assessment referred to does not capture the scale of change in the financial reporting landscape since 2021, of which the burden has increased enormously.

The 2021 impact assessment also fails to present a comprehensive illustration of the overall benefits this change will bring to consumers, nor does it provide insight into how this reporting has helped Ofgem perform its duties.

If a decision is taken to expand the CSS thresholds to include smaller suppliers, Ofgem should consider conducting regular checks, possibly on an annual basis. It is important that Ofgem continues to measure the benefits brought to consumers by this change, when weighed against the increased cost and administrative burdens placed on newly obligated suppliers.

I hope you have found our response helpful. If you would like more information, or have any questions about our views, please do not hesitate to let me know.

Kind regards,

**Simon Shaw**
Regulatory Affairs Lead