
Call for Input - Exercising Consumer Choice: A review of the gas disconnections framework

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1. Introduction

- 1.1 The way in which consumers are using the energy network is evolving, with an increasing number choosing to disconnect from their gas supply and install alternative heat sources within their homes¹ and businesses².
- 1.2 We consider the ability of consumers to exercise their choice to disconnect from the gas network and electrify their homes and businesses to be integral to the interests of current and future energy consumers, including their interests in the Government meeting its net zero targets.
- 1.3 As the economic regulator for gas networks, we are aware of reports from consumers and consumer advocates on behalf of domestic consumers who say that the current process to disconnect their supply is costly and a potential barrier to those wishing to transition away from gas. In addition to concerns around cost, we are also aware of reports that the current regulatory framework is complex and difficult to navigate, an issue that is exacerbated by a lack of clear guidance available for consumers on how the process works in practice.
- 1.4 We are committed to acting on these concerns and as such, our current intention is to review the regulatory arrangements that govern the gas disconnection process for domestic and small business consumers³ to ensure it remains fit for purpose as use of the gas system continues to evolve.
- 1.5 This Call for Input kickstarts that review by seeking stakeholder views on the current framework and potential future regulatory frameworks that may operate more effectively, assist in achieving net zero and protect consumers. It also seeks quantitative data from industry, for example, data on the current and expected costs of carrying out gas disconnection works as well as data on current and future gas disconnection volumes to help us in identifying trends, risks and opportunities. While we invite stakeholders to respond to the specific questions set out in Chapter 2, we would also invite views on any aspect of the issues raised in this paper.

¹ When we refer to homes and households, we include those residential premises that receive gas by way of non-domestic contracts including care homes, farm worker accommodation and mobile park homes, among others.

² [FES: Data Workbook 2024](#), National Energy System Operator.

³ By small businesses we mean those businesses with an annual gas consumption of not more than 500,000 kWh.

Ofgem's role

- 1.6 As Great Britain's independent energy regulator, Ofgem's principal objective is to protect the interests of existing and future gas and electricity consumers, including their interests in the Government's compliance with the net zero target for 2050 and five-year carbon budgets⁴. In regulating these sectors, we⁵ also have a duty to promote growth.
- 1.7 Ofgem's economic regulation of the gas sector extends to gas conveyed through transmission, distribution and independent networks⁶. The regulation of these networks is achieved through legislation such as the Gas Act 1986, statutory instruments, and industry codes.

An overview of the regulatory framework for gas disconnections

- 1.8 The Gas Act 1986, its subordinate legislation and related statutory instruments, namely licences and industry codes (which collectively we refer to as the Gas Laws) form a regime of economic regulation for Gas Transporters⁷ and their networks, for which Ofgem is responsible for monitoring and enforcing.
- 1.9 The Gas Laws prescribe certain duties, powers and rights for Gas Transporters, including obligations and requirements imposed on them in relation to the connection and disconnection of parties to their networks.
- 1.10 The Gas Act 1986 requires all Gas Transporters, including Gas Distribution Networks (GDNs), to carry a relevant gas transporter licence which imposes on them certain regulatory and financial conditions⁸. GDNs charge consumers requiring a gas disconnection a reasonable and cost reflective charge relating to the disconnection. This disconnection cost can result in different amounts depending on the case or circumstance of the disconnection, in conjunction with

⁴ Being the obligations on the Secretary of State set out in sections 1 and 4(1)(b) of the Climate Change Act 2008.

⁵ References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document to refer to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work.

⁶ By transmission network, we mean the National Transmission System (NTS), a system formed of high pressure gas pipelines that transport gas from terminals and ports and is owned and operated by National Gas Transmission (NGT). By distribution network, we mean the network of medium and low pressure pipelines that receive gas from the NTS and are owned and operated by the four Gas Distribution Networks (GDNs), namely Cadent, Northern Gas Networks, SGN and Wales and West Utilities. By independent gas networks, we mean the local gas transportation networks owned and operated by independent gas transporters.

⁷ By Gas Transporters we mean the licensed companies that own or operate gas pipelines. NGT is the Gas Transporter for the NTS. Gas Transporters can also own and operate GDNs or independent gas networks.

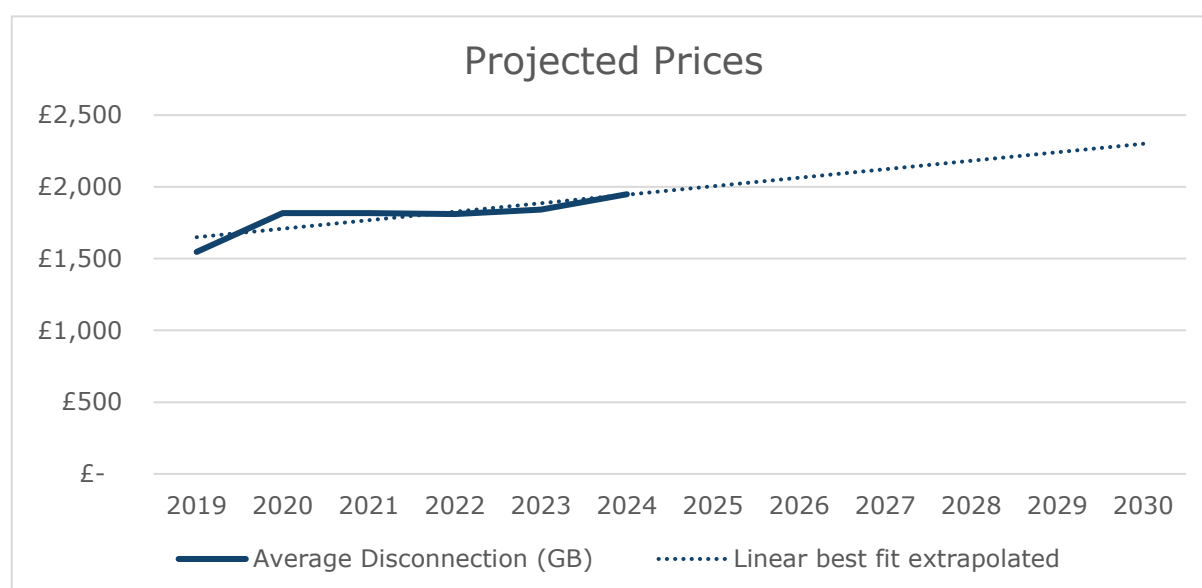
⁸ This requirement is subject to the exceptions set out in section 6A and Schedule 2A to the Act.

the GDNs' connection charging methodology as approved by the Authority. We call this process a 'voluntary disconnection'.

- 1.11 However, GDNs are not able to charge customers for any gas disconnection works required under health and safety legislation⁹, including the disconnection and capping of pipes 12 months after any meter has been removed¹⁰. We term this parallel and alternate gas disconnection process, which is regulated by the Health and Safety Executive, a 'health and safety disconnection'.

The issues

- 1.12 The cost of disconnecting from the gas network is high, and we expect these rates to increase in the coming years, regardless of inflation. In 2019, the average voluntary disconnection price for consumers across GB was £1,546.90¹¹. As things stand, an average gas disconnection price is approximately £1,950 and if current trends continue, we estimate that this could increase to approximately £2300 by 2030.



⁹ In particular the Gas Safety Installation and Use Regulations 1998, the Pipeline Safety Regulations 1996 and the Gas Safety (Management) Regulations 1996.

¹⁰ Gas Safety Installation and Use Regulations (GSIUR) 1998, established under the Health and Safety at Work etc. Act 1974 and regulated by the Health and Safety Executive.

¹¹ Please note, this figure is an average across all types of standard disconnection charges as detailed by the Gas Distribution Network companies in their Connection Charges Statements. To arrive at these figures we deflated the nominal disconnection cost to 2019 prices to find out the increase in the price of disconnection costs over time excluding inflation. These disconnection costs may include profit. Please also note that by costs we mean costs incurred by the entity and by price we mean moneys recovered from consumers.

- 1.13 Anecdotal reports from consumer groups tell us that many domestic consumers are now waiting to disconnect via the health and safety disconnection process so as to avoid these high gas disconnection charges. As Gas Transporters are unable to charge for this type of gas disconnection, according to industry, these costs are ultimately passed onto other customers through network charges which in turn leads to higher household bills for those that remain on the network. We intend to investigate this issue further as part of this Call for Input and understand to what extent it also extends to small business consumers.
- 1.14 Ofgem is also aware of reports that many consumers struggle to understand the current framework, due to the existence of the two alternate gas disconnection processes set out in legislation (see paragraphs 1.10-1.11 above) and the absence of clear guidance on how the processes are intended to operate.

The potential impacts

- 1.15 As the number of premises electing to install heat-pumps and other low carbon technologies increases, so too does the number of gas customers requesting that their gas supply be disconnected in order to avoid paying standing charges for a supply they no longer use. With gas disconnection volumes expected to rise significantly in the coming years, we consider the following to be the key potential impacts associated with regulatory inaction or the introduction of inappropriate reform measures:
- if current trends continue and gas disconnection prices continue to rise and outstrip inflation, those wishing to disconnect from the network will be faced with higher direct costs and may be deterred from switching to a heat pump or other technologies;
 - as the gas disconnection workload for industry increases and in turn the expenditure on health and safety disconnections, were these rising costs to be socialised and spread across a declining consumer base, we are concerned that the impact of higher bills will be felt most acutely by those last to transition off the network including the most vulnerable consumers who may not be able to afford electrification;
 - in the event that measures were introduced that restricted the ability of gas distribution companies to recover their reasonable costs without first finding an alternative means for overheads to be sustainably absorbed, the financial viability of the network companies would likely be negatively impacted. In turn, this could

raise bills through higher financing costs and also threaten security of supply for GB gas consumers should any of these companies suffer financial distress;

- the absence of clear guidance for current consumers on how the gas disconnection processes are intended to operate may prevent some consumers from exercising their power to choose the type of energy supply they wish to use and in turn making the switch to greener technologies;
- a weak and outdated gas disconnections framework which fails to clarify roles and responsibilities and set clear expectations for industry, regulators and consumers will likely prevent an orderly decommissioning of the gas network;
- Government's objective to accelerate net-zero will likely be hindered by a regulatory framework that may no longer be fit for purpose for the energy transition and the benefits of net-zero initiatives undermined by a failure to address the barriers to gas disconnection.

We intend to gain a better understanding of these issues and potential impacts through this Call For Input allowing us to investigate them further.

Our objective and approach to the review

Objective

1.16 Ofgem's principal objective under the Gas Act 1986 is to protect the interests of existing and future consumers in relation to gas conveyed through pipes. As such, the primary aim of our review will be to consider the information we receive in response to this Call for Input on:

- the current gas disconnection process and the drivers behind disconnections,
- historic and expected future volumes of gas disconnections,
- historic and expected future costs of gas disconnections,
- the factors that affect the gas disconnections framework, and
- potential regulatory and legislative changes to the current framework

and assess the ability of the existing framework and any potential future framework to protect the interests of consumers and deliver UK's net zero emissions target at lowest cost to consumers.

- 1.17 We are conducting this review now as there is a need to examine these frameworks ahead of the expected increase in heat pump uptake¹² and other low carbon technologies to meet ambitious Government targets, to ensure they are fit for purpose and fair for current and future consumers.

Approach

- 1.18 We will use information, data and documents provided in response to this Call for Input to identify existing and future trends, risks and opportunities. We will gather this information as well as the views of stakeholders via this Call for Input, as well as potential future formal consultations and engagements if necessary.
- 1.19 If we are unable to gather the requisite information we require to conduct this review via voluntary responses, we may elect to issue a Request for Information to regulated entities using our powers under Section 34A of the Gas Act 1986.
- 1.20 We will use the information we gather and analysis we complete to understand the impact and effectiveness of the existing gas disconnections framework and to compare current arrangements with alternate arrangements of merit identified by us, industry or other stakeholders. We will develop an approach to assessing the different options and identify the key principles for an effective gas disconnections regime in accordance with our statutory duties.
- 1.21 The review may produce one or several different options depending on the results of the analysis undertaken by us.

2. Responding to the Call for Input

Who should respond?

- 2.1 We are keen to engage with a wide range of interested parties. This Call for Input has therefore been drafted with the intention that it is read by a general audience, including industry stakeholders such as Gas Transporters and suppliers, those working in the gas sector as well as representatives of domestic and small business consumers. While questions 1-10 have been drafted with this in mind, we consider questions 11-35 to be relevant only to Gas Distribution Networks, Independent Gas Transporters and Utility Infrastructure Providers (UIPs) given the nature of the data

¹² In 2020, the government established the ambition to grow the market in heat pumps to 600,000 installations per year by 2028 ([The Ten Point Plan for a Green Industrial Revolution](#), November 2020).

and information sought. While the latter are not regulated by Ofgem, we welcome responses from UIPs, to the extent that the questions are relevant to them.

- 2.2 Our current intention is to review the regulatory arrangements that govern the gas disconnection process for domestic and small business consumers. We would therefore ask respondents to limit their responses as well as the quantitative data submitted to those particular types of consumer.
- 2.3 We welcome responses to the questions that follow and, as far as possible, ask that responses are supported with appropriate evidence in the form of information, documents, numerical data and analysis.

Questions

The current gas disconnections framework

- 1. How effective is the current gas disconnections framework in protecting the consumer interest, assisting net zero goals and promoting economic growth?**
- 2. What factors impact the effectiveness of the framework in achieving its objectives?**
- 3. What factors impact the efficiency of the framework in achieving its objectives?**
- 4. What other factors beyond those impacting the effectiveness and efficiency of the framework (dealt with in questions 2 and 3), for example, safety, financial, commercial factors, ought Ofgem consider as part of its review?**
- 5. What factors do you believe will impact demand for gas disconnections?**

A future gas disconnections framework

- 6. What are the potential future regulatory frameworks, regimes or mechanisms that should be considered for gas disconnections that would operate effectively, assist in achieving net zero and protect consumers?**

We are open to hearing any potential options you have identified for regulatory reform whether they be commercial, technological, regulatory, policy-based or legislative in nature. While Ofgem is not responsible for changing legislation, we can make recommendations to government.

- 7. Of these potential future frameworks, regimes or mechanisms which is preferable and why?**

- 8. Are there any impediments inherent in the potential future regulatory frameworks, regimes or mechanisms identified in response to question 6 above that would affect their effective operation, the achievement of net zero and/or the protection of consumers?**

Additional

- 9. For the purposes of this Call for Input, we have defined 'small businesses' as those with an annual gas consumption of not more than 500,000 kWh. What are the implications, if any, of using this definition?**
- 10. Is there anything else we ought to consider that has not been covered in your responses to questions 1-9?**
-

We consider the following questions to be relevant to Gas Distribution Networks, Independent Gas Transporters and Utility Infrastructure Providers (UIPs). While the latter are not regulated by Ofgem we welcome responses from UIPs, to the extent that the questions below are relevant to them.

Process

- 11. What is the step-by-step process for carrying out a gas disconnection and the role(s) of each party involved in the process?** As part of your response, please describe the internal, administrative process as well as the practical procedures carried out on-site. Please also confirm at what stage in the process costs are recovered.
- 12. What, if any, ancillary services are impacted by the disconnection process (e.g. renovators, appliance technicians etc)? What/who are they, and what impact could any change to the disconnection framework have on them?**

Historic and future volumes of gas connections and disconnections

- 13. How many domestic health and safety disconnections for households and small businesses have been carried out over GD2 to date? What is the anticipated number to be carried out in 2025 - 2026 and over GD3 and up until 2035?** As part of your response, please provide a breakdown showing the figure for each regulatory year and for each Local Distribution Zone (LDZ) (or LDZ equivalent for UIPs). If possible, please also provide a breakdown showing the figure for each type of health and safety connection. If possible, please provide a
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breakdown showing the figure for households and the figure for small businesses. If you are able to provide data prior to the start of GD2, please do so. In your response, please also explain your methodology for calculating the projected figures, including the Future Energy Pathway (also known as the Future Energy Scenario) used and any assumptions that have been made to arrive at the projected figures.

14. What factors, if any, could impact the anticipated number of health and safety disconnections for households and small businesses to be carried out over GD3 and up until 2035?

15. How many voluntary disconnections for households and small businesses have been carried out over GD2 to date? What is the anticipated number to be carried out in 2025 – 2026 and over GD3 and up until 2035? As part of your response, please provide a breakdown showing the figure for each regulatory year and for each LDZ (or LDZ equivalent for UIPs). If you are able to provide data prior to the start of GD2, please do so. If possible, please provide a breakdown showing the figure for households and the figure for small businesses. In your response, please also explain your methodology for calculating the projected figures including the Future Energy Pathway (also known as the Future Energy Scenario) used and any assumptions that have been made to arrive at the projected figures.

16. What factors, if any, could impact the anticipated number of voluntary disconnections for households and small businesses to be carried out over GD3 and up until 2035?

17. How many of the voluntary disconnections for households and small businesses carried out over GD2 were deemed to be non-standard (e.g. 'Sufficiently Complex') works, by which we mean those works defined as such in your Connection Charging Methodology? As part of your response, please provide a breakdown showing the figure for each regulatory year and for each LDZ (or LDZ equivalent for UIPs). If possible, please provide a breakdown showing the figure for households and the figure for small businesses.

18. How many gas connections for households and small businesses have been carried out over GD2 to date? What is the anticipated volume to be carried out in 2025-2026 and over GD3 and up until 2035? As part of your response, please provide a breakdown showing the figure for each regulatory year and for each LDZ (or LDZ equivalent for UIPs). If you are able to provide data prior to the start of GD2, please do so. If possible, please provide a breakdown showing the figure for households and the figure for small businesses. In your response,

please also explain your methodology for calculating the projected figures including the Future Energy Pathway (also known as the Future Energy Scenario) used and any assumptions that have been made to arrive at the projected figures.

Costs

19.What costs are incurred in carrying out a health and safety disconnection or voluntary disconnection for households and small businesses, including:

- (i) the cost and availability of labour (including salaries and wages);**
- (ii) the use of land and related costs (including rent);**
- (iii) finance and administration costs;**
- (iv) regulatory and policy compliance costs;**
- (v) the cost of consumables and other business outputs;**
- (vi) the cost of repairs, upkeep and maintenance; and**
- (vii) any other costs (whether controllable or uncontrollable) incurred that do not fall under (i)-(vi)?**

As part of your response please provide the current average cost for each and the expected cost for each over the course of GD3. Please provide the figures for both health and safety disconnections and voluntary disconnections if the costs differ for each. If possible, please provide a breakdown showing the figure for households and the figure for small businesses if these differ.

20.What is the average cost of a health and safety disconnection for households and small businesses, including:

- (i) the average cost for each year of GD2 to date, any changes in average cost over the course of GD2 and the reason(s) for these changes;**
- (ii) the estimated average cost in 2025-2026, during GD3 and up until 2035 and the reason(s) for any changes.** In your response, please provide a breakdown showing the figure for each regulatory year if appropriate; **and**
- (iii) the number carried out over GD2 to date incurring costs that exceeded the figure provided in answer to question 20(i) above?**

If possible, please provide a breakdown showing the figure for households and the figure for small businesses if these differ.

21. In what circumstances has the cost exceeded the figure provided in answer to question 20(i) and are there any other circumstances where the cost would exceed the figure provided in question 20(i)-(ii)?

22. How and when are the costs of a health and safety disconnection for households and small businesses recovered?

23. Is there a cap on the maximum total cost to be incurred in carrying out a health and safety disconnection for households and small businesses and if so, what is the cap?

24. What is the average cost charged for a voluntary disconnection for households and small businesses, including:

- (i) the average cost for each year of GD2 to date, any changes in average cost over the course of GD2 and the reason(s) for these changes;**
- (ii) the estimated average cost in 2025-2026, during GD3 and up until 2035 and the reason(s) for any changes.** In your response, please provide a breakdown showing the figure for each regulatory year if appropriate;
- (iii) the average cost of a voluntary disconnection deemed to be non-standard (e.g. Sufficiently Complex) works; and**
- (iv) the number carried out over GD2 incurring costs that exceeded the figure provided in answer to question 24(i) above?**

If possible, please provide a breakdown showing the figure for households and the figure for small businesses.

25. In what circumstances would the cost exceed the figure provided in answer to question 24(i) above and are there any other circumstances where the cost would exceed the figure provided in question 24(i)-(ii)?

26. How and when are the costs of a voluntary disconnection for households and small businesses recovered?

27. Is there a cap on the maximum total cost to be incurred in carrying out a voluntary disconnection for households and small businesses and if so, what is the cap?

28. How are the costs incurred for work designed to enhance your system and which are additional to those required to fulfil the requirements of a

voluntary disconnection request separated out from the costs incurred in fulfilling the request?

29. How (if at all) do costs of gas disconnection for households and small businesses differ depending on:

- (i) connection type;**
- (ii) consumer type (i.e. household or small business);**
- (iii) complexity of the works (i.e. standard / non-standard works);**
- (iv) time taken to complete the works;**
- (v) headcount;**
- (vi) provider type and size (i.e. the provider of the gas disconnection works, for example, a UIP, GDN or IGT);**
- (vii) geographical location (for example, urban, regional, and remote);**
- (viii) level of competition present in the market for the supply of gas disconnection services; and**
- (ix) any other factors that do not fall under (i)-(vii)?**

30. Can you estimate what proportion of your network is made up of pipes with the following diameters: $\leq 63\text{mm PE}^{13}$ / 2" met¹⁴; 90mm PE / 3" met; 125mm PE / 4" met; 180mm / 6" met; $> 180\text{mm PE}$ or $> 6"$ met? As part of your response, please provide a breakdown showing the figure for each Local Distribution Zone (LDZ) if possible.

Factors affecting the gas disconnections framework

31. What factors affect demand, supply and competition in gas disconnections, including the extent and existence of practices and strategies in response to the existing disconnections regulatory and policy framework?

32. What impact do the above factors have on viability, quality and profits of gas disconnection services?

The consumer journey

33. What guidance have you made available to consumers on the gas disconnection process and the differences between a voluntary and health and safety disconnection?

¹³ By 'PE' we mean plastic service pipes.

¹⁴ By 'met' we mean metallic service pipes.

34. Has any consumer research and/or testing been carried out to establish or improve the service and information you provide to consumers wishing to disconnect from the network? If yes, please provide information on the outcome of that work and any relevant documents and/or data.

35. What are the barriers or impediments, if any, to consumers understanding the disconnection process and/or framework that are outside your control?

Guidance for stakeholders

2.4 Respondents are invited to use our response template which accompanies this CFI to provide the quantitative data requested in questions 13,15,17,18,19,20, 24 and 30.

2.5 Please note that it is not necessary to submit information or data in response to any of the matters listed above where that information or data has already been submitted to Ofgem. We ask that in these circumstances you provide:

- details of when the information was provided and the context for the provision of the information; and
- your consent to us using this data and information as part of our review of the domestic gas disconnections framework and for the reasons given in paragraphs 1.20 and 3.3.

To assist us in locating the relevant information or data we ask respondents to provide as much detail as possible.

2.6 Please note that by 'health and safety disconnections' we mean gas disconnections carried out pursuant to a legal obligation under health and safety legislation including the Gas Safety (Installation and Use) Regulations 1998 which require the disconnection of premises 'as near as reasonably practicable to the main' within 12 months of the relevant meter being removed¹⁵. By 'voluntary disconnections' we mean gas disconnections carried out at the request of the consumer and which are not required under health and safety legislation. Where the type of gas disconnection is unspecified, we are referring to both safety and voluntary disconnections collectively.

¹⁵ See the Health and Safety Executive's Approved Code of Practice and guidance document, '[Safety in the installation and use of gas systems and appliances](#)' for further information.

- 2.7 References to GD2 mean the period starting on 1 April 2021 and ending on 31 March 2026.
- 2.8 References to GD3 mean the period starting on 1 April 2026 and ending on 31 March 2031.

3. Next Steps

- 3.1 Please email responses to gas.systems@ofgem.gov.uk by 7 March 2025. We may publish non-confidential responses on our website (see paragraphs 3.4-3.7 below for more information).
- 3.2 We invite stakeholders' views on any aspect of the issues raised in this paper and in particular on the questions raised in Chapter 2. We ask that, as far as is possible, responses are supported with appropriate evidence in the form of information, documents, numerical data and analysis. As set out in paragraph 2.4 above, respondents are invited to use our response template which accompanies this CFI to provide the quantitative data requested.
- 3.3 Following this Call for Input, we intend to commence a formal review of the arrangements governing gas disconnections for households and small businesses to ensure they remain fit for purpose across the energy transition. As set out in paragraph 1.20 above, we will use the information we gather to understand the impact and effectiveness of the existing gas disconnections framework and to compare current arrangements with alternate arrangements of merit identified by us, industry or other stakeholders. We will develop an approach to assessing the different options and identify the key principles for an effective gas disconnections regime in accordance with our statutory duties. The review may produce one or several different options for change depending on the results of the analysis undertaken by us. We will engage with industry and wider stakeholders on these options and next steps.

Your response, your data and confidentiality

- 3.4 You can ask us to keep your response, or parts of your response, confidential. We'll respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your

response confidential, please clearly mark this on your response and explain why. We have included check boxes on the response template for you to mark whether the data and/or information supplied is confidential.

- 3.5 If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. We advise that you password protect your response and send your response and the password to us in two separate emails. If necessary, we'll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.
- 3.6 If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the UK's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.
- 3.7 If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.