



OVO Energy  
1 Rivergate  
Temple Quay  
Bristol BS1 6ED

[policy@OVOenergy.com](mailto:policy@OVOenergy.com)  
[www.OVOenergy.com](http://www.OVOenergy.com)

Andrew Milligan  
Financial Resilience and Controls, Ofgem  
[css@ofgem.gov.uk](mailto:css@ofgem.gov.uk)  
By email only

24 October 2025

Dear Andrew,

**OVO response to Ofgem Consultation on Modification of Consolidated Segmental Statements**

Thank you for the opportunity to respond to this consultation. We support Ofgem's efforts to improve the guidance for the consolidated segmental statement submissions.

We believe that it would be beneficial for Ofgem to provide more detailed clarification on "metering" costs. While the guidance has always stated that these costs should be included under "Indirect Costs", previous CSS submissions indicate varying interpretations among suppliers. This is likely due to the wide range of costs associated with metering and therefore we think that more detailed guidance in this area would be helpful.

We would be happy to discuss our response further, and should you have any questions please contact [policy@OVOenergy.com](mailto:policy@OVOenergy.com).

Kind regards,

Nicola Roberts  
**Senior Regulation Manager, OVO**