

Andrew Milligan
Ofgem
10 South Colonnade
London E14 4PU

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Dear Andrew

Consolidated Segmental Statements Guidance Update

This letter is open and non-confidential

Tilix welcomes the opportunity to respond to Ofgem's consultation published on 26th September 2025. We commend Ofgem for its continuing commitment to transparency in the retail energy market. The CSS scheme improves the evidence base available to policymakers, investors, and consumers. It is a fine example of regulatory reporting that simultaneously supports accountability, competition, and public trust.

We particularly endorse Ofgem's progress in refining the technical accounting guidelines. Clearer definitions, consistent categorisation of costs, and improved reconciliation requirements will enhance comparability across licensees and over time.

That said, we believe that the open data dimension deserves further development. The publication of PDFs alone does not fully realise the potential of the scheme. We therefore encourage Ofgem to consider a subsequent consultation dedicated to the technical aspects of open data. We hope that future CSS disclosures (machine readable, published under permissive licences) would enable richer secondary analysis, improve auditability, and reduce costs for both licensees and the regulator.

Tilix does not share the reservations expressed by some respondents regarding cost, proportionality, or the capacity of smaller suppliers. In our direct experience supporting a micro-supplier with its CSS submission, the process proved manageable and beneficial. Furthermore, we can demonstrate that meaningful cross-sector analysis is achievable with meagre resources. See <https://drnw.github.io/ofgem-css/>

In our view, a well-designed open data framework would lower, not raise, the burden of compliance. It would also unlock the creativity of analysts, academics, and innovators working to strengthen market understanding and consumer outcomes. We look forward to continued engagement whilst the guidelines are finalised and whilst you consider the future of the CSS scheme.



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Tilix