

Andrew Ryan
Ofgem

Sent via email to DebtConsultations@ofgem.gov.uk

27 August 2025

Dear Andrew

Debt Relief Scheme (DRS): Policy update working paper

I am writing on behalf of the Independent Networks Association (INA), a trade body which represents the interests of independent utility networks across the gas, electricity and water sectors.

Thank you for the opportunity to comment on Ofgem's latest proposals for the debt relief scheme. The INA membership is supportive of the approach and measures outlined in the consultation. Specific comment is made below on one of the key components of the approach discussed.

Section 6. Funding and supplier cost recovery process

INA members would like to confirm that the proposed approach of networks reimbursing suppliers using the supplier of last resort model i.e. "Pay when Paid" is the best methodology for cost recovery of this scheme. This addresses our concerns of additional risk being priced into the investment in networks and any perceived wider risks for investors in the energy networks sector.

I hope you find this useful, please contact me if you have any questions or queries or wish to discuss further.

Yours sincerely,



Nicola Pitts
Executive Director