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### **Future of the Gas Transporter Traditional Metering Obligations post-2025**

EDF is the UK's largest producer of low carbon electricity. EDF operates low carbon nuclear power stations and is building the first of a new generation of nuclear plants. EDF also has a large and growing portfolio of renewables, including onshore and offshore wind and solar generation, as well as energy storage. With over five and a half million electricity and gas customer accounts, including residential and business users, EDF aims to help Britain achieve net zero by building a smarter energy future that will support delivery of net zero carbon emissions, including through digital innovations and new customer offerings that encourage the transition to low carbon electric transport and heating.

EDF is committed to supporting all its customers to save cash and save carbon. It is why we have completed a successful migration to the Kraken platform. It is also why this winter we are making an additional £30m of support available to help our customers most in need in response to the ongoing Cost of Living crisis. This commitment to our customers is reflected in our Trustpilot score recently increasing to 4.8 out of 5, giving us a score of five stars.

We welcome the opportunity to respond to Ofgem's consultation on the future of the Gas Transporter Traditional Metering Obligations post-2025. It is, however, concerning that this consultation has been issued so close to the expiry of the current licence obligations, and seemingly without certainty being obtained from the Gas Distribution Networks (GDNs), and National Gas Transmission (NGT) that they will support the voluntary arrangements proposed.

We are only able to agree that the current licence obligations should not be extended if all GDNs and NGT have confirmed that they have agreed to the proposed voluntary commitments, and specifically the pricing principles. EDF has a significant number of customers (c.440k) whose traditional gas meters are supported under the current licence obligations. If the current providers do not agree to voluntarily provide a traditional metering service from the 1<sup>st</sup> January 2026, or if they significantly increase the price of their metering services, this provides insufficient time to negotiate terms with an alternate provider and transfer the portfolio to them. This would leave our customers with no support for their gas metering and potentially increase bills if any additional costs resulting from Ofgem's decision to end the current metering arrangements cannot be accounted for under the price cap.

We welcome Ofgem's confirmation that it will step in and reinstate the licence obligations if the GDNs and NGT abuse their market position, or if suppliers are not able to find alternative service providers at a fair price. While we hope that commercial negotiations will lead to the

right outcomes for all parties, Ofgem needs to be able to intervene and take action to protect consumers from unnecessary costs.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the points raised in our response or have any queries, please contact Paul Saker or myself.

I confirm that this letter and its attachment may be published on Ofgem's website.

Yours sincerely

A handwritten signature in black ink, appearing to read "Denise Willis".

**Denise Willis**  
**Senior Manager of Industry Change**

## Attachment

### Future of the Gas Transporter Traditional Metering Obligations post-2025

#### EDF's response to your questions

##### **Q1a. Do you agree the proposed voluntary commitments set out in paragraph 2.2?**

Yes.

We broadly agree that the proposed voluntary commitments should support continuity of the current metering arrangements. However, we require early clarity on what the pricing for the voluntary arrangements will be under the proposed pricing principle. We assume that this principle will ensure that there is not a material increase in the costs to suppliers as a result of moving to a voluntary arrangement, but we need this to be confirmed. Any increase in the costs to suppliers will ultimately result in higher costs for consumers.

We are only able to agree that the licence obligations should not be extended if all GDNs and NGT have confirmed that they have agreed to the proposed voluntary commitments, and specifically the pricing principles. If any of the current providers do not agree to voluntarily provide a traditional metering service from the 1<sup>st</sup> January 2026, or if they significantly increase the cost of their metering services, there is insufficient time available for suppliers to negotiate terms with an alternate provider.

##### **Q1b. Do you agree that this agreement will provide consistency over the 12 months it is in place until 31 December 2026?**

Yes.

However, this agreement is dependent on the pricing of metering services under the voluntary arrangements. If the incumbent service providers do not adhere to the pricing principle and there is a material increase in the costs to suppliers as a result of moving to a voluntary arrangement, this will ultimately result in higher costs for consumers,

##### **Q2. Do you agree with and propose to uphold the principles of the voluntary agreement set out above in paragraph 2.2 while continuing to offer traditional metering services from 1 January 2026 until 31 December 2026?**

We note that only NGT and the GDNs who offer traditional metering services were asked to respond to this question. However, we would like to note our concern that this consultation has been issued so close to the expiry of the current licence obligations, and that Ofgem is considering removing them without any confirmation from NGT or the GDNs that they will agree to the proposed voluntary arrangements. This provides suppliers with little certainty that these voluntary arrangements will be implemented universally or consistently.

**Q3. Do you agree with our proposal to remove the additional licence conditions set out below from NGT's Gas Transporter Licence Standard Special Conditions section B?**

No.

The consultation notes that Ofgem will step in and reinstate the licence obligations if the GDNs and NGT abuse their market position, or if suppliers are not able to find alternative service providers at a fair price. On that basis it would seem prudent for the obligations to remain in NGT's Gas Transporter Licence but inactive, should it become necessary for them to be reactivated in the future.

**EDF**  
**December 2025**