

Dear Ofgem Heat Networks Regulation team,

Please accept the comments below as Veolias response to the authorisation conditions consultation. I have broken our *comments* down by the AC and point they refer to. For the points not mentioned below, we have no comments.

Section A: Condition 3: Definitions

Electronic communication: means a message comprising text or an image of text that:

- (a) is sent over a Public Electronic Communications Network;
- (b) can be stored in that network or in the recipient's terminal equipment until it is collected by the recipient; and
- (c) is in a particular form and is used for a particular purpose and the recipient of it has expressed a willingness, to the sender, to receive it in that form and for that purpose;

Could Ofgem please clarify that ANY of these circumstances would be considered electronic communication, and not that an electronic communication must fulfill ALL of the points.

Section A: Condition 3: Definitions

Self-rationing: "When a Domestic Consumer deliberately limits its use of heating, cooling or hot water to save money for other goods or services.

We understand the rationale for defining self-rationing as above, but would query how this works in practice (for example lessons from how this has been applied in the G&E markets). As such, guidance would be appreciated. How would the operator know if a consumer is self rationing if that are not told? If they are told, for example in a phonecall the consumer was to mention that they have started turning off their heating earlier than usual, would this constitute self-rationing? If not mentioned, is the service provider expected to ask the consumer?

Section B: Condition 6: Provision of Billing and Price Transparency of Information

6.3 Where Bill or Billing Information for a supply of heating, cooling or hot water are intended to be based:

6.3.1 on meter readings from a Supply Meter to be provided by a Relevant Consumer but that Relevant Consumer has not provided a meter reading; or

6.3.2 on meter readings from a Supply Meter with smart functionality, but the

authorised person, despite taking all reasonable steps, is unable to obtain a meter reading, a Bill or Billing Information may be based on an estimate of consumption.

Further elaboration on what actual actions would constitute 'all reasonable steps' would be appreciated, either by formally defining the term or some guidance.

Section B: Condition 6: Provision of Billing and Price Transparency of Information

6.16 Any Bills or statements of account must either:

6.16.1 be provided in a Form that allows a Relevant Consumer to easily retain a copy; or

6.16.2 be made easily available to a Relevant Consumer for reference.

Can Ofgem please clarify that Bills or statements of account can be electronic if they meet these criteria (i.e. are downloadable/retainable)

Section B: Condition 11: Self-Disconnection

11.11 In the event it is technically infeasible to apply the Prepayment Meter Credit in paragraph 11.9, the authorised person must take all reasonable steps to ensure that the Domestic Consumer does not experience an interruption to their supply of heating, cooling or hot water.

Again, further elaboration on what actual actions would constitute 'all reasonable steps' would be appreciated, either by formally defining the term or some guidance.

Thank you for your time, if you wish to discuss any of these points in further details, please let me know.