

# Guidance

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## **Review of historical debt related costs Confidentiality Rings - Compliance Statement Guidance**

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This document is for stakeholders interested in participating in the Spring 2026 disclosure arrangements for the review of historical debt related costs.

We require stakeholders and each of their advisers to set out in separate "Compliance Documents" how they will comply with the terms of the review of historical debt related costs confidentiality rings. The Compliance Documents should describe the arrangements each party has in place to keep the disclosed material secure. This document describes the arrangements that must be considered within these Compliance Documents.

**Guidance** – Review of historical debt related costs Confidentiality Rings - Compliance  
Statement Guidance

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## 1. Introduction

### Context and related publications

- 1.1 We previously published the following:
- Decision on the additional debt-related costs review in February 2024.<sup>1</sup>
  - Decision on the operating cost and debt allowances review in May 2025.<sup>2</sup>
- 1.2 Between 25 March and 16 June 2026, we intend to consult on a minded-to position of making no further adjustment to the price cap for debt-related costs incurred between April 2022 and June 2025
- 1.3 Our proposals for the consultation rely on detailed modelling and analysis. For stakeholders to understand our proposals, we consider it necessary to disclose the key models and data that underpin them.
- 1.4 If you wish to participate in the disclosure process for this consultation, you will need to submit Compliance Documents and undertakings.
- 1.5 The Compliance Documents should describe the arrangements each party has in place to keep the disclosed material secure. This document describes the arrangements that must be considered within these Compliance Documents.

### Your feedback

- 1.6 We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this guidance. We'd also like to get your answers to these questions:
- Do you have any comments about the overall quality of this guidance?
  - Do you have any comments about its tone and content?
  - Was it easy to read and understand? Or could it have been better written?
  - Any further comments?

Please send any general feedback comments to [priceprotectionpolicy@ofgem.gov.uk](mailto:priceprotectionpolicy@ofgem.gov.uk)

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<sup>1</sup> Ofgem (2024), "Energy price cap: additional debt costs review decision", <https://www.ofgem.gov.uk/decision/energy-price-cap-additional-debt-costs-review-decision>

<sup>2</sup> Ofgem (2025), "Energy price cap operating cost and debt allowances decision: overview", [https://www.ofgem.gov.uk/sites/default/files/2025-05/Energy-price-cap-operating-cost-and-debt-allowances-decision-overview\\_0.pdf](https://www.ofgem.gov.uk/sites/default/files/2025-05/Energy-price-cap-operating-cost-and-debt-allowances-decision-overview_0.pdf)

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## 2. Guidance

- 2.1 We require stakeholders and each of their advisers to set out in separate “Compliance Documents” how they will comply with the terms of the debt-related costs true-up review confidentiality rings.
- 2.2 The Compliance Document should describe the arrangements each party has in place to keep the disclosed material secure having given the relevant undertakings. At a minimum, the Compliance Documents should briefly explain the following arrangements.

### Security arrangements

- 2.3 These are processes to store electronic and physical copies of the disclosed material, and in doing so maintain their confidentiality in accordance with the undertakings.
- 2.4 This includes the following:
- proposed method of transferring electronic copies of the disclosed material from Ofgem to stakeholders;
  - appropriate protection in place when storing electronic and physical copies of the disclosed material; and
  - consideration of how to delete files containing, and destroy physical copies of, the relevant information at the end of the disclosure process.
- 2.5 Where stakeholders’ IT systems retain backup copies of information, and it is not reasonably possible to delete those backups at the end of the disclosure process, stakeholders must commit to ensuring that no backed-up data is accessed or restored without Ofgem’s prior approval. Appropriate protections should remain in place to maintain the confidentiality of the information in line with the undertakings.

### Working environment arrangements

- 2.6 These are processes to ensure that Authorised Attendees and authorised Advisers (as defined and described in the undertakings) can work on the disclosed material and discuss their contents, and in doing so maintain their confidentiality in accordance with the undertakings.
- 2.7 This includes the following:

- appropriate protections in place in an office environment to maintain the confidentiality of disclosed material and their contents; and
- appropriate protections in place in a working from home environment to maintain the confidentiality of disclosed material and their contents.

## **Support arrangements**

2.8 These are processes to ensure that: (a) Authorised Attendees and authorised Advisers are aware of their responsibilities and the arrangements the Relevant Party/Firm (as defined in the undertakings) has in place, (b) sufficient monitoring and governance is in place to maintain confidentiality, and (c) support and guidance is available to authorised Attendees.

2.9 This includes the following:

- confirmation that Authorised Attendees and Advisers have read and understood the compliance statement and the relevant undertakings;
- confirmation that appropriate support/guidance is available to Authorised Attendees and Advisers on how to comply with the compliance statement and undertakings;
- clarification of the roles and responsibilities of the Compliance Officer, or similar persons, in maintaining confidentiality of the disclosed material; and
- processes in place in the event of a breach of confidentiality.