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20 April 2026

Dear Daniel

### **Review of typical domestic consumption values**

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. EDF is therefore driving the transition towards '[an Electric Britain](#)' – a secure, affordable, low-carbon future for everyone. As [Britain's biggest generator of zero carbon electricity](#), we are investing more than £100 million weekly in Britain's electricity infrastructure. We supply millions of customers with electricity and help homes and businesses switch to electricity for heating, transport and industrial processes.

EDF supports Ofgem's proposals, set out in this consultation, to revise the Typical Domestic Consumption Values (TDCV). It is essential that consumer-facing benchmarks, such as TDCV, are kept as accurate as possible, using the most robust, up-to-date data available.

Given the usage of TDCV throughout the domestic energy market, as a benchmark for tariff affordability and informed choices, and as a basis for the Default Tariff Cap (DTC) methodology, EDF supports the earliest implementation of the revised values, from July 2026. This timeliness is particularly important given the previous review was conducted in 2023 (and used 2019 and 2021 data, to exclude anomalous consumption data from the 2020 COVID period), and Ofgem has observed significant and material changes to domestic customers' energy consumption over the intervening years. We note that this represents a favourable overall cost reduction to domestic customers across all TDCV consumption bands.

In addition to its market-wide use as a benchmark to establish estimated annual consumption as a basis for domestic customer tariff costs, the TDCV is a fundamental part of the DTC methodology. As acknowledged by Ofgem in this consultation, an accurate TDCV plays a core role in the DTC for volumetric fixed cost recovery. Against the backdrop of consistently falling customer consumption, it is vital that suppliers are able to recover their fair costs from DTC customers to support the sustainability and investability of the domestic energy market. We note this reflects Ofgem's November 2025 decision, as highlighted by this consultation, reinforcing regulatory certainty.

EDF agrees with Ofgem's decision to update the gas TDCV using the forward-looking methodology set down by Xoserve's Seasonal Normal Composite Weather Variable (SNCWV) approach. It is correct that the TDCV is updated based upon the most robust and current available data ensuring the benchmarking of consumption remains accurate and transparent, to support informed tariff choices for domestic customers, and sustainable cost recovery for the resilience of the market as a whole.

On Ofgem's decision to reserve the Economy 7 (E7) peak/off-peak consumption split for further consideration as part of the wider ongoing work to implement Market-wide Half-Hourly Settlement (MHHS). EDF recognises the logic of Ofgem's rationale and will continue to constructively engage with Ofgem on MHHS implementation, including via the current Call for Input on the technical approach to developing the DTC to accommodate MHHS.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Mark Hatton, 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 "John Mason", enclosed within a thin black rectangular border.

**John Mason**  
**Senior Manager - Senior Manager (Price Regulation and Market Dynamics)**