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“Tackling Energy Debt in the Supplier Home Moves Process” – So Energy Response

Dear Sophia,

So Energy is a leading energy supplier providing great value renewable electricity to homes across Great Britain. We supply 300,000 customers as one of the last challenger suppliers left in the market and one that is backed by ESB Group’s resources and expertise, So Energy is able to provide a unique view of debt and affordability in today’s energy market.

This is a very good initiative and we are happy to lend support to your working group. It is essential that rising levels of debt in the industry are tackled as quickly as possible.

Unfortunately we are not in the position to submit additional evidence, due to volume of consultations and RFIs at this time. However, the 20-40% estimate is within the range of our reasonable estimates.

In terms of approach, our preference would be for uniform minimum standards across suppliers. This would take the form of clearly articulated steps every supplier would take, and, provided they are taken, the premises would be switched to prepay mode. These steps should be stated in clear, simple terms and positive terms – “your supplier will...”. This will help give consumers and consumer advisors a clear understanding of how the new process will work across the industry.

More generally, the existing Standards of Conduct and Ofgem’s new approach to compliance can be used to guard against adverse consumer outcomes. We would caution against imagining what could go wrong and writing a great deal of additional rules to address hypothetical situations. This is especially true given, in the context of traditional prepayment, customers have been moving into premises supplied by a prepay meter for decades and it seems to work rather well.

Yours Sincerely,

Paul Fuller  
Head of Regulation

