

Jemma Baker  
The Office of Gas and Electricity Markets  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

Email to: [FutureConsumers@Ofgem.gov.uk](mailto:FutureConsumers@Ofgem.gov.uk)

22 January 2026

Dear Jemma,

### **Call for input: Consumer Outcomes**

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.

#### **Executive summary**

EDF welcomes Ofgem's ambition to improve consumer outcomes and modernise the regulatory framework. The energy market has changed significantly in recent years, with major suppliers now operating under stronger governance, enhanced resilience, and robust compliance structures. The approach to regulating GB's energy market must now also evolve to reflect today's realities and support the transition to net zero, focusing on measurable outcomes that deliver tangible benefits for consumers while enabling flexibility and innovation. This means moving away from duplication and prescriptive rules toward a streamlined, outcome-based model that prioritises fairness, affordability, and resilience.

Ofgem's work on Consumer Outcomes is, at its core, an opportunity to reset the regulatory culture of energy retail in GB: away from ever thicker rulebooks and towards a model that defines what good looks like, enables innovation in how to get there, and uses transparency and supervision to lift performance over time. For that shift to be credible, however, it cannot be aimed only at suppliers. It also requires a deliberate reset in Ofgem's own regulatory culture: a move away from solving each new pressure point by adding another prescriptive rule, and towards a more collaborative, evidence-led and outcomes-focused way of regulating, one that builds trust through clarity, predictability, and earlier engagement with the market.

When taking forward its work in relation to Customer Outcomes we would, therefore encourage Ofgem to remain mindful of the following:

#### **Modernising energy regulation**

The energy market has matured significantly since Ofgem last undertook significant reform of the regulatory rulebook. Compliance failures are increasingly rare and consumer satisfaction levels are the highest they have been since the introduction of the Default Tariff Cap (DTC) and continue to improve each quarter. Ofgem's approach to regulation must, therefore, reflect current conditions and the market we wish to see going forwards, rather than legacy risks such as mis-selling or supplier collapse.

A forward-looking framework should target genuine, ongoing risks and measurable consumer outcomes, recognising the stronger governance and protections already in place across the supply sector. Ofgem's approach must shift from input-based compliance to a culture that trusts suppliers and regulates the outcomes they deliver. EDF, for example, has strengthened governance and operational resilience through robust compliance frameworks, enhanced audits, and significant investment in systems and digital tools to improve customer support. These investments enable rapid responses to market shocks, ensuring continuity of supply and safeguarding vulnerable customers.

There is also now a clear expectation that regulation should back growth, support innovation and remove unnecessary administrative burden. Outcomes-based regulation is a credible way to achieve that in retail energy because it can simplify the rule set, reduce duplication, and concentrate regulatory effort on the outcomes that matter most, particularly for vulnerable consumers, without prescribing a single operational model for the entire market.

#### Clear direction

Combining prescriptive rules with outcome-based principles creates duplication, confusion, and unnecessary complexity. Such hybrid models drive higher compliance costs, slows decision-making, and limits innovation by forcing suppliers to meet overlapping obligations rather than focus on delivering real consumer benefits. It also diverts resources away from frontline customer support, where they can make the greatest impact.

EDF strongly supports a clear, outcome-based regulatory approach that empowers suppliers to achieve defined consumer outcomes without being constrained by rigid, process-heavy requirements. A model that allows flexibility and innovation while maintaining accountability through transparent standards and appropriate assurance is essential.

In addition, it is critical to reduce—not increase—red tape and ensure a joined-up approach and coherence across the wide range of in-flight regulatory consultations and change. Without this alignment, the risk of conflicting obligations and unnecessary complexity will undermine the very outcomes the reforms seek to achieve.

With this in mind, we do have concerns about Ofgem's concurrent call for input on Guaranteed Standards of Performance (GSOP). A broadening GSOP regime would appear to pull in the opposite direction to that signalled by a shift to outcomes. GSOPs are prescriptive by nature: they translate complex service delivery into binary triggers and fixed payments, and it encourages suppliers to manage to a narrow definition of compliance rather than to manage to outcomes. In practice, an expanded use of GSOPs also risks pulling the regulator back towards a "rule-

*accumulation*” mindset where the primary response to service concerns is to tighten or multiply standards, rather than using outcomes-based supervision, transparency and targeted intervention to address the real drivers of detriment. That is not a stable direction for the sector.

We do, however, recognise that some targeted prescription may still be necessary in areas of highest risk, such as safeguarding vulnerable customers, or where uniformity across the market is essential, but these should be minimal, clearly defined, and where appropriate subject to sunset clauses to prevent permanent overlap. This will help ensure regulation remains dynamic and adaptable, rather than locking the industry into dual frameworks that combine the worst aspects of both approaches.

### **Clear and fair framework**

A simpler framework improves responsiveness, supports innovation, and reduces unnecessary cost. Regulatory obligations should be proportionate to risk, avoiding blanket requirements that add complexity without evidence of improved outcomes. Trust should be built through predictable enforcement focused on material harm, collaborative guidance, and recognition of supplier maturity.

Success should be defined through explicit outcomes, limited minimum standards where needed, and illustrative examples to reduce interpretation risk. Ofgem should set data, evidence, and audit expectations in advance. New measures should be introduced through phased transitions and co-designed with industry, using pilots and feedback loops to refine requirements before full implementation.

Going forward, any new obligations should also be required to pass a clear gateway test: they must be necessary, proportionate, fundable, and non-duplicative. Without this discipline, Ofgem will inevitably risk cutting across the intent of outcomes-based reform.

### **Consumer protection**

We know from experience that front-line teams deliver better outcomes when guided by principles rather than rigid, prescriptive metrics. An outcome-based approach enables faster resolution and more tailored support—particularly in areas such as debt management, affordability, fair pricing, and resilience. This approach also encourages innovation and responsiveness, allowing suppliers to focus on what matters most: delivering tangible improvements for customers rather than complying with inflexible rules. Accountability remains essential but should be maintained through clear outcome standards, proportionate assurance, and targeted audits—not continuous micromanagement.

Safeguards should be simple and practical, including clear debt-support pathways, tailored repayment options, proactive identification of vulnerability, and timely hardship support. Regulation should also promote resilience through effective crisis planning that prioritises continuity of supply and fair treatment. Transparency should focus on meaningful indicators—such as customer outcomes and resolution speed — rather than raw league tables that risk misinterpretation and gaming.

### Reputational incentives—handled carefully

A coherent outcomes-based model starts from the premise that competition and reputation matter. In today's market, consumers are more informed, switching is more normalised, and service failures travel quickly. That reputational discipline is a powerful lever, often far stronger than Ofgem rules, because it affects growth, retention and brand trust. It is also more aligned to the kind of continuous improvement Ofgem is seeking. If the regulator wants to drive better service, the most impactful intervention is not necessarily a bigger menu of rules; it is enabling consumers to see, compare and act. A transparency-led approach, backed by effective supervision and targeted enforcement for serious failings, is how an outcomes-based regime will work.

However, while transparency can drive improvement, poorly designed comparisons risk unfair penalties and distorted incentives. A balanced scorecard approach is, therefore, preferable, reflecting outcomes achieved, quality of vulnerability support, complaint resolution timeliness, and affordability interventions. These measures should also be contextualised where possible to reflect customer mix and regional factors, ensuring comparisons are fair and constructive.

### Cross Government support

Achieving a transformation to an outcomes-based approach to regulation will be challenging and demands clear ownership and accountability at the highest levels. It must, therefore, be embedded in Ofgem's organisational objectives and cascaded into the personal objectives of senior leadership to ensure commitment and sustained delivery. Making this a core strategic priority will drive consistent behaviours across the organisation and reinforce the importance of outcomes-focused regulation.

If the shift to outcomes-based regulation is to endure, it will also need explicit, sustained buy-in beyond Ofgem alone. A recurring concern raised in the Consumer Outcomes discussion is that momentum can dissipate once the consultation closes. To avoid that, the move towards outcomes-based regulation should be anchored through clear cross-government support and policy alignment, particularly across Ofgem, DESNZ and DBT, so that it becomes a stable long-term direction rather than a short-lived programme. That includes embedding the approach in the frameworks that shape regulatory expectations over time.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact Tamara Dowson 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 'Keith Watson', with a stylized flourish at the end.

**Keith Watson**  
**Senior Manager Customers Policy and Regulation**

## **Attachment**

### **Call for input: Consumer Outcomes**

**Q1. In your view, what are the key factors we should consider if we are updating our regulatory framework for retail energy suppliers, keeping in mind the balance between our growth and net zero goals, and consumer interest duties?**

EDF would note the following:

#### **Reflect today's market conditions**

The energy market has matured; major suppliers are resilient, and compliance failures are rare. Regulation should focus on current risks and measurable consumer outcomes, not legacy concerns like mis-selling. Effort must target areas that deliver clear benefits rather than duplicating outdated controls.

#### **Enable growth and net zero**

The framework should support innovation and investment in low-carbon solutions, digital tools, and services that accelerate the transition to net zero. Overly prescriptive rules stifle progress and divert resources from initiatives that help consumers adopt electric transport, low-carbon heating, and energy efficiency. An outcomes-based approach can help unlock flexibility while maintaining protection.

#### **Adopt a clear outcome-based model**

Hybrid frameworks combining prescriptive rules with outcomes create duplication, complexity, and cost. EDF advocates a clear outcome-based approach that empowers suppliers to deliver defined results without rigid processes. Where prescriptive rules remain necessary (e.g., vulnerability safeguards), they should be minimal, targeted, clearly defined, and where possible time limited.

#### **Proportionality and simplicity**

Obligations must be proportionate to risk and avoid blanket requirements that add cost without improving outcomes. A simpler framework enhances responsiveness, supports innovation, and reduces complexity. Success should be measured through explicit outcomes and clear standards.

#### **Consumer protection and fairness**

Outcome-led regulation enables faster resolution and tailored support in areas like debt management, affordability, and resilience. Safeguards should include clear debt pathways, flexible repayment options, proactive vulnerability identification, and timely hardship support.

#### **Transparency that drives improvement**

Reputational incentives have a key role to play but must be designed carefully. Poorly structured comparisons risk unfair penalties and distorted behaviours. A balanced scorecard approach—reflecting outcomes, vulnerability support, complaint resolution, and affordability—offers a fairer, more constructive alternative.

### **Critical alignment across regulatory change**

It is critical to reduce—not increase—red tape and ensure a joined-up approach and coherence across the wide range of in-flight regulatory consultations and change programmes. Without this alignment, the risk of conflicting obligations and unnecessary complexity will undermine the very outcomes the reforms seek to achieve.

### **Government endorsement and organisational accountability**

If the shift to outcomes-based regulation is to endure it will also need explicit, sustained buy-in beyond Ofgem alone. A recurring concern raised in the Consumer Outcomes discussion is that momentum can dissipate once the consultation closes. To avoid that, the move towards outcomes-based regulation should be anchored through clear cross-government support and policy alignment, particularly across Ofgem, DESNZ and DBT, so that it becomes a stable long-term direction rather than a short-lived programme. That includes embedding the approach in the frameworks that shape regulatory expectations over time.

In addition, the approach should be embedded in Ofgem's organisational objectives and cascaded into senior leadership goals to ensure ownership and sustained delivery. Making this a core strategic priority will drive consistent behaviours across the organisation and reinforce the importance of outcomes-focused regulation.

### **Q2. Why do you think there is such a divergence of satisfaction rates across different consumer cohorts?**

Consumers have diverse priorities - a vulnerable customer, for example, may require more tailored support and flexible repayment options, while others value digital convenience and speed — meaning uniform standards can fail to meet these varied needs. Cohorts with debt challenges or specialist metering can face more complex, but necessary, service journeys with multiple touchpoints, increasing the risk of delays, and rigid frameworks that limit suppliers' ability to adapt solutions. While external factors such as price volatility, policy changes, and media-driven demand spikes can also disproportionately affect certain groups, creating uneven experiences.

Current prescriptive regulation reinforces a “one-size-fits-all” approach, whereas an outcome-based model would enable faster, tailored support, particularly for vulnerable customers, while maintaining accountability. A flat, universal and stringent DTC can also compound these challenges, as suppliers must balance limited funding across competing priorities, making flexibility essential to deliver better outcomes for all consumers.

### **Q3. The Consumer Outcomes have been developed based on what industry, charities, consumer groups and consumers have told us they need to cover. Do you agree that these outcomes cover the most important expectations consumers have of energy suppliers?**

The proposed Consumer Outcomes broadly reflect the most important expectations Ofgem have for the energy market and system today. However, many of the outcomes appear to relate more to market expectations, rather than consumer expectations. Others also appear to stretch beyond



what should be expected specifically of suppliers, overlapping with the responsibility of other participants, including energy networks and Ofgem itself. The Consumer Outcomes should, therefore, be revisited and reviewed with a view to ensuring these are focused on those outcomes sought by customers and exclusively in a supplier's control.

Further, the effectiveness of any outcomes ultimately depends on their implementation. Outcomes cannot just be another layer of rules but must be embedded within a clear, outcome-based regulatory framework that allows flexibility and innovation while maintaining accountability.

**Q4. Do you think we should streamline or consolidate the Consumer Outcomes further and, if so, which should we prioritise?**

Yes, building on our response to Q3, EDF believes there is considerable scope to streamline and consolidate the Consumer Outcomes to make them clearer, more practical, and easier to implement. Consolidation should prioritise proportionality and simplicity, grouping related outcomes to avoid duplication and reduce interpretation risk. For example, fairness, affordability, and resilience could sit under a single "Consumer Protection" outcome, while transparency and reputational incentives could be combined into one streamlined category.

EDF supports a simplified framework that reduces complexity, avoids duplication, and focuses on measurable outcomes within a supplier's control that deliver tangible benefits for consumers. This approach will make implementation more efficient and maintain flexibility for innovation while safeguarding vulnerable customers.

**Q5. Do you agree with the explanations provided of the Consumer Outcomes in the appendices of this call for input? Do they help you understand the intent of the outcomes?**

The explanations provided help clarify the intent of the Consumer Outcomes. They are broadly aligned with what consumers, charities, and industry stakeholders have identified as priorities—fairness, transparency, resilience, and tailored support.

However, EDF stresses that clarity in explanation must translate into clarity in implementation. Outcomes should not become just another layer of rules that sit on top of an already substantial and rigid rule book. Instead, they must be embedded within a streamlined, outcome-based regulatory framework that allows and encourages flexibility and innovation while maintaining accountability.

**Q6. Why do you think these outcomes are not materialising consistently for all consumer groups given that they are in line with our existing rules?**

These outcomes are not materialising consistently because of structural and practical challenges in the current framework. The current frameworks emphasise rigid metrics over outcomes, leading to a "one-size-fits-all" approach that overlooks nuanced needs. Further under a flat, universal and stringent DTC suppliers operate within tight financial budgets with limited headroom and returns.

**Q7. Do you think some outcomes are more important for consumers than others?**

Yes, some outcomes are more critical for consumers than others. EDF believes that outcomes relating to consumer protection, affordability, and resilience should be prioritised. These areas have the greatest impact on vulnerable customers and those facing financial hardship, ensuring they receive timely support and fair treatment.

**Q8. Do you see an opportunity for outcomes, though not necessarily the Consumer Outcomes set out in this call for input, to be applied to wider market participants? Who should they apply to and why?**

Yes, there is an opportunity to apply outcomes-based principles to wider market participants, provided they are proportionate and relevant to the role those parties play. For example:

- **Networks and System Operators:** Outcomes around resilience, reliability, and timely fault resolution could apply to network operators, as these directly impact consumer experience.
- **Third-Party Intermediaries (TPIs):** Outcomes related to transparency, fair treatment, and clear communication should extend to TPIs and brokers, given their influence on consumer decisions, particularly in the non-domestic market.
- **Industry Service Providers (e.g. DCC):** Where smart metering performance depends on shared infrastructure, outcomes should apply to the parties responsible for those systems to ensure accountability across the value chain, not just suppliers.

Applying outcomes beyond suppliers would help create a coherent, end-to-end framework that focuses on what matters most—consumer experience—while avoiding duplication and ensuring each participant is accountable for what is within their control. This approach supports fairness, clarity, and better overall outcomes for consumers.

**Q9. Do you have a preferred approach among those outlined below or should we retain the current framework? Do you have an alternative suggestion? Please explain your reasoning.**

Rather than retaining the current hybrid model, prescriptive rules should be minimised and reserved only for areas of highest risk, while outcomes should drive flexibility, innovation, and measurable improvements for consumers. The current framework creates duplication and complexity, increasing compliance costs without delivering proportionate benefits. An outcomes-based approach would allow suppliers to focus on delivering tangible results—such as improved affordability, resilience, and tailored support—rather than meeting rigid process requirements.

**a) What level of action/intervention do you feel would be proportionate to drive up customer service in the non-domestic sector? Does it differ from domestic?**



For the non-domestic sector, EDF believes intervention should be proportionate and targeted. Larger businesses typically negotiate bespoke contracts and service levels, so universal prescriptive standards would add cost without clear benefit. Instead, outcomes-based principles, supported by contractual remedies, are more effective for this segment, while microbusiness customers may require closer alignment with domestic protections to ensure fairness and continuity of service.

Whichever option is chosen, a formal Government statement backing outcomes-based regulation is essential to anchor implementation and deter reversion to prescriptive layering.

**Q10. Do you think a voluntary approach – where suppliers make a public commitment to deliver the Consumer Outcomes without formal regulatory change could be effective? What conditions would need to be in place for this to work?**

A voluntary approach could work in principle, but only under specific conditions. Public commitments by suppliers can demonstrate intent and foster collaboration, but effectiveness depends on clear and shared definitions of the outcomes to avoid ambiguity, transparency and accountability through agreed reporting standards and independent oversight, and proportionality so that commitments remain realistic within the current DTC framework. It would also require industry-wide participation to ensure a level playing field and prevent competitive distortions, alongside a regulatory backstop so Ofgem can intervene if voluntary measures fail. EDF supports voluntary collaboration where it encourages innovation and flexibility, but it must be underpinned by clarity, transparency, and proportionality to avoid becoming symbolic rather than effective.

**Q11. Could a more outcomes-based regulatory framework benefit the supply market? Do you think this kind of approach could unlock innovation and growth? Please provide examples.**

Yes. By moving away from rigid, prescriptive rules, suppliers could gain the flexibility to design solutions that deliver measurable improvements for consumers rather than focusing on compliance with process-heavy requirements. This approach could enable faster adoption of digital tools, tailored support for vulnerable customers, and investment in low-carbon technologies that accelerate the transition to net zero. For example, suppliers could innovate in areas such as smart energy management, flexible repayment solutions, and proactive vulnerability identification without being constrained by overlapping obligations. An outcomes-based model could also foster greater competition on service quality and customer experience rather than on meeting narrow compliance metrics, driving efficiency and resilience while maintaining accountability through clear, transparent standards.

**Q12. Are there specific licence conditions where less prescription could benefit the retail market without compromising consumer protection?**

a) For suppliers: are there any areas where you find guidance helpful or unhelpful?

Yes, EDF believes there are specific licence conditions where less prescription could benefit the retail market without compromising consumer protection. Areas such as complaints handling, affordability support, and customer engagement would be better governed through principles and

outcomes rather than rigid, metric-driven rules. Prescriptive requirements often create a “one-size-fits-all” approach that limits flexibility and innovation, whereas principle-led obligations allow suppliers to tailor solutions to individual needs while maintaining accountability.

Guidance is helpful when it clarifies intent and supports consistent interpretation, but it becomes unhelpful when it introduces de facto new obligations or adds complexity without improving outcomes. EDF supports guidance that explains expectations in plain language and provides illustrative examples, while avoiding duplication or creating parallel compliance regimes.

**Q13. Are there areas where prescriptive rules should remain in place? If so, why?**

EDF believes some prescriptive rules should remain in place, but only in areas of highest risk where consumer harm would be significant and where outcomes cannot be reliably achieved through principles alone. Examples could include safeguarding vulnerable customers, ensuring billing accuracy, and maintaining continuity of supply. These obligations provide essential baseline protections and should be minimal, clearly defined, and subject to regular review or sunset clauses to prevent permanent overlap with outcome-based regulation. Retaining a small number of prescriptive rules in these critical areas ensures predictability and consumer confidence while allowing the wider framework to remain flexible and innovation friendly.

**Q14. What factors should we consider determining whether specific rules are best delivered through prescription, principles or outcomes?**

When determining whether specific rules are best delivered through prescription, principles, or outcomes, Ofgem should consider several key factors. These include the level of risk and potential consumer harm, the degree of control suppliers have over the process, and whether the obligation can be measured objectively or requires professional judgment. Prescriptive rules may be appropriate for high-risk areas where failures are binary and easily verifiable, or where uniformity in approach is absolutely needed across suppliers.

Principles work best where flexibility and judgment are needed to tailor solutions to individual circumstances, while outcomes are most effective for driving innovation and focusing on measurable improvements without constraining processes. Proportionality, clarity, and funding context should underpin all decisions to ensure obligations are practical, non-duplicative, and aligned with the intent of an outcome-based framework.

**Q15. Which of the monitoring approaches we outline below would be the most effective for monitoring supplier performance against the Consumer Outcomes? Are there alternative approaches? Please provide evidence.**

The most effective monitoring approach is one that is proportionate, transparent, and aligned with the intent of an outcomes-based framework. Monitoring should focus on meaningful indicators of consumer experience — such as resolution speed, quality of vulnerability support, and affordability interventions — rather than rigid process metrics or raw league tables that risk distortion. A

balanced scorecard approach, contextualised by customer mix and regional factors, would provide a fairer and more constructive view of performance.

We also support structured, standardised reporting with clear definitions to ensure consistency across suppliers, combined with risk-based engagement rather than heavy-handed enforcement triggered by isolated variances. This approach would maintain accountability while avoiding unnecessary complexity and cost, ensuring monitoring drives genuine improvement in outcomes rather than compliance for its own sake.

To reinforce this, monitoring should also align to Ofgem's internal objectives for senior leaders, creating a clear line of sight between organisational accountability and consumer outcomes.

**Q16. How do we best measure our success as to whether we have:**

- a) Improved consumer outcomes and achieved our ambitions for customer service and**
- b) Reduced regulatory burden and encouraged growth and innovation**

Success should be measured through clear, outcome-focused indicators that demonstrate both improved consumer experience and reduced regulatory burden. For part (a), this means tracking metrics such as resolution speed, quality of vulnerability support, affordability interventions, and overall customer satisfaction—contextualised to reflect different consumer cohorts. For part (b), success should be assessed by the extent to which the framework enables innovation and growth, measured through indicators like investment in digital tools, adoption of low-carbon solutions, and the introduction of new customer offerings.

Importantly, these measures should be developed collaboratively with industry, supported by transparent reporting and phased implementation, to ensure they reflect real improvements rather than compliance with rigid processes.

To reinforce this monitoring should also align to Ofgem's internal objectives for senior leaders, creating a clear line of sight between organisational accountability and consumer outcomes.

**Q17. Is there anything Ofgem can do to improve how we work and engage with you as a stakeholder on retail energy supply policy and regulation?**

Ofgem can improve engagement by fostering more collaborative, transparent, and iterative dialogue with suppliers. Early involvement in policy development—through structured workshops, co-design sessions, and pilot programs—helps to ensure proposals are practical, proportionate, and aligned with market realities. Clearer communication of regulatory intent and expectations, supported by timely guidance and feedback loops, would also reduce interpretation risk and avoid unnecessary complexity.

We also encourage Ofgem to adopt a more risk-based approach to engagement, focusing effort where consumer harm is most likely, and to maintain open channels for sharing insights on emerging challenges and innovations. This collaborative model would strengthen trust, improve regulatory outcomes, and support innovation while safeguarding consumers.

If the shift to outcomes-based regulation is to endure, it will also need explicit, sustained buy-in beyond Ofgem alone. A recurring concern raised in the Consumer Outcomes discussion is that momentum can dissipate once the consultation closes. To avoid that, the move towards outcomes-based regulation should be anchored through clear cross-government support and policy alignment, particularly across Ofgem, DESNZ and DBT, so that it becomes a stable long-term direction rather than a short-lived programme. That includes embedding the approach in the frameworks that shape regulatory expectations over time.

**EDF**  
**January 2026**