

FINAL REPAYMENT DIRECTION

THIS FINAL REPAYMENT DIRECTION is made under clause 7 of the Deed of Undertaking made on 8 February 2022, between the GAS AND ELECTRICITY MARKETS AUTHORITY (the Authority) acting by THE OFFICE OF GAS AND ELECTRICITY MARKETS (Ofgem) and Octopus Energy Operations 2 Limited (previously known as Shell Energy Retail Limited) (the True-up Agreement).

1. In accordance with its obligations under clause 2.2 of the True-up Agreement, the Authority decided on 14 December 2023 that the True-up Agreement will cease to have effect on the date that the SoLR has repaid the total Excess determined by that decision. That decision was conditional on the SoLR repaying any amounts it received in respect of Customer Credit Balances, which would have resulted in an Excess for the purposes of clause 5 of the True-up Agreement, and any future repayments will be considered in accordance with the terms of the True-up Agreement.
2. On that basis, and in accordance with its obligations under clause 5 of the True-up Agreement, Octopus Energy Operations 2 Limited (Company Number: 05070887) has submitted to the Authority a True-up in relation to acting as Supplier of Last Resort (SoLR) to customers of the former **GoTo Energy (UK) Limited (Company Number: 09844990)**.
3. The Authority has reviewed the True-up in accordance with clause 5 of the True-up Agreement and has determined that the Valid True-up Amount is an Excess. The reasons for the Authority's decision can be found in its decision document published on 18 September 2026.
4. The Authority provided a draft of this Repayment Direction to Octopus Energy Operations 2 Limited in accordance with clause 7.1 of the True-up Agreement and has considered representations and responses in accordance with clause 7.2.
5. In accordance with clause 7 of the True-up Agreement the Authority directs that the Excess, plus Interest accrued, shall be repaid as follows:
 - a. Amount: Excess of **£15,720.93** is to be paid at the time and by the method below.
 - b. Interest: Interest of **£1,688.40** accrued in respect of the Excess and is to be paid at the same time and by the same method as the Excess.
 - c. Time: Payments to commence from April 2027.
 - d. Method: 12 monthly payments of combined Excess and Interest is to be made to each relevant network operator as set out in clause 6 of this Direction **UNLESS** earlier payment or payments (but no earlier than April 2027) are agreed between Octopus Energy Operations 2 Limited and relevant gas transporters and electricity distribution licensees.
6. The total amount of Excess and Interest to be paid by **Octopus Energy Operations 2 Limited** is **£17,409.33**.
7. Repayment is to be made to the relevant gas transporter licensees, as set out in Schedule 1, and the relevant electricity distribution licensees, as set out in Schedule 2, in the following amounts:

- a. **45%** of the total amount be repaid by Octopus Energy Operations 2 Limited
£7,834.20 is to be paid to each relevant gas transporter licensee in the proportions set out in Schedule 1;
- b. **55%** of the total amount be repaid by Octopus Energy Operations 2 Limited
£9,575.13 is to be paid to each relevant electricity distribution licensee in the proportions set out in Schedule 2.

Dated: 18/09/2026

Elaine Hutcheson
Deputy Director, Financial Resilience and Controls
Duly authorised on behalf of the Authority

Schedule 1 – Allocation to Gas Networks

GDN	Customers	
	#	Proportion
Cadent - East	4,045,910.0	18.3%
Cadent - London	2,270,065.0	10.3%
Cadent - North West	2,700,549.0	12.2%
Cadent - West Midlands	1,973,387.0	8.9%
NGN	2,560,228.5	11.6%
SGN - Scotland	1,852,538.0	8.4%
SGN - Southern	4,145,784.0	18.7%
WWU	2,573,706.0	11.6%
Total	22,122,168	100%

Schedule 2 – Allocation to Electricity Networks

Distribution Licensee	Total Number of Premises	Proportion of Total Number of Premises
Electricity North West Limited	2,427,511	8.0%
Northern Powergrid (Northeast) plc	1,618,576	5.3%
Northern Powergrid (Yorkshire) plc	2,332,833	7.7%
Scottish Hydro Electric Power Distribution plc	800,332	2.6%
Southern Electric Power Distribution plc	3,157,831	10.4%
SP Distribution plc	2,020,019	6.6%
SP Manweb plc	1,534,609	5.0%
Eastern Power Networks plc	3,719,925	12.2%
London Power Networks plc	2,420,130	7.9%
South Eastern Power Networks plc	2,359,503	7.7%
National Grid Electricity Distribution (East Midlands) plc	2,709,181	8.9%
National Grid Electricity Distribution (South Wales) plc	1,163,640	3.8%
National Grid Electricity Distribution (South West) plc	1,664,748	5.5%
National Grid Electricity Distribution (West Midlands) plc	2,529,603	8.3%
Total	30,458,441	100%