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Sent by email only to: FutureConsumers@Ofgem.gov.uk
Cc: [redacted]

20 July 2026

Dear Future Retail Markets Team

Re: Supply licence simplification

Thank you for providing the opportunity to respond to Ofgem's statutory consultation on supply licence simplification. We welcome Ofgem's housekeeping approach as a first step towards streamlining and updating the electricity and gas supply licences to improve clarity, remove outdated conditions and consolidate definitions.

We note that this is a first phase in simplifying the licence and that more will come with the progression of Ofgem's move to a Consumer Outcomes Regulatory Framework. We recognise that this consultation does not represent a substantial overhaul or fundamental change to the SLCs, and we expect that Ofgem will, in due course, conduct further extensive work to review obsolete or outdated SLCs. However, we welcome this step-by-step approach to enable an easier transition.

We also welcome Ofgem's proposals to improve its approach to issuing guidance, and that, where possible, such guidance can be hyperlinked and accessed from the relevant SLC in the document.

Where Ofgem proposes to remove licence conditions with an end date or licence conditions that are no longer relevant, we would welcome clarity on how Ofgem will preserve an accessible history or audit trail, should this ever be required to review historic compliance positions or previous regulatory obligations.

We note that Ofgem has already moved its SLCs from PDF to HTML, making this an online, live and up-to-date document. However, it may be helpful to ensure that there is a simple way for users to convert this to PDF, where this is the user's preferred working format or supports easier searching by term.

Broader observations

While we recognise that this consultation is intended to simplify and consolidate licence drafting, SLC 28AD highlights an area where substantive policy review may also be warranted. The current provisions continue to preserve legacy protections for a narrow cohort of Warm Home Discount customers based on historic scheme participation rather than current circumstances. This may create operational complexity and interpretive risk over time. We encourage Ofgem to consider a future review of SLC 28AD to assess whether

the policy remains proportionate, targeted and consistent with current vulnerability and consumer protection objectives.

While Ofgem has not suggested any changes to smart metering SLCs within this consultation, as these are implemented and amended by Government, we suggest that Ofgem considers, as part of future simplification work with Government, whether the presentation and accessibility of the Guaranteed Standards of Performance (GSOPs) framework could be improved. The current format can be difficult to navigate and interpret.

Full responses to the questions raised within the consultation can be found in Appendix A, together with detailed drafting comments that could be addressed as part of this initial phase of simplification.

If you would like to discuss any of our responses, please feel free to contact me at [redacted].

Yours faithfully

Amanda Nolan

Amanda Nolan
Senior Regulatory Manager
Centrica

Appendix A

1. **Do you agree with amending the wording of unused SLCs to one consistent term, "Not in use", and other proposed minor drafting amendments to SLC titles?**

We agree with amending the wording of unused SLCs to one consistent term, "Not in use", and other proposed minor drafting amendments to SLC titles.

2. **Do you agree that SLC 25D of the electricity supply licence and SLC 28A, 28AA and 32A of the electricity and gas supply licences have historic end dates that have not been extended? If so, do you agree that they should be removed?**

We agree that SLCs 25D, 28A, 28AA and 32A have historic end dates that have not been extended and agree that they should be removed. As noted in our covering letter, we would welcome clarity on how Ofgem will preserve an accessible history or audit trail for removed licence conditions.

3. **Do you agree that SLC 25E of the electricity supply licence is no longer relevant and could be removed?**

We agree that SLC 25E, as it was introduced for the purpose of EBSS, is no longer relevant and could be removed.

As a future-facing point, given ongoing discussions with Government on consumer support, Ofgem may wish to consider whether any similar provision is likely to be required again before the condition is removed permanently.

4. **Do you agree that SLC 21A of the electricity and gas supply licences is no longer relevant and could be removed?**

We agree that SLC 21A of the electricity and gas supply licences is no longer relevant and could be removed.

5. **Do you agree that SLC 56 of the electricity supply licence and SLC 50 of the gas supply licence are no longer relevant and could be removed?**

We agree that SLC 56 of the electricity supply licence and SLC 50 of the gas supply licence are no longer relevant and could be removed.

6. **Do you agree with consolidating definitions within SLC 1, as much as possible?**

Yes, we agree with consolidating definitions within SLC 1 as much as possible.

7. **Do you agree, or have any comments on, our proposed modifications to the licence?**

Agreement with proposed modifications

We agree with Ofgem's proposals as outlined above. We also welcome Ofgem's phased approach to simplifying the licence, alongside the progression of its move to a Consumer Outcomes Regulatory Framework. We recognise that this consultation does not represent a substantial overhaul or fundamental change to the SLCs and expect that Ofgem will, in due course, conduct further work to review obsolete or outdated SLCs.

We also welcome Ofgem's proposals to improve its approach to issuing guidance, and that, where possible, such guidance can be hyperlinked and accessed from the relevant SLC in the document.
As noted in our covering letter, where Ofgem removes licence conditions as part of this process, we would welcome clarity on how an accessible history or audit trail will be preserved for future reference.

Broader observations on guidance, SLC 28AD and GSOPs

While we recognise that this consultation is intended to simplify and consolidate licence drafting, SLC 28AD highlights an area where substantive policy review may also be warranted. The current provisions continue to preserve legacy protections for a narrow cohort of Warm Home Discount customers based on historic scheme participation rather than current circumstances. This may create operational complexity and interpretive risk over time. We encourage Ofgem to consider a future review of SLC 28AD to assess whether the policy remains proportionate, targeted and consistent with current vulnerability and consumer protection objectives.

While Ofgem has not suggested any changes to smart metering SLCs within this consultation, as these are implemented and amended by Government, we suggest that Ofgem considers, as part of future simplification work with Government, whether the presentation and accessibility of the Guaranteed Standards of Performance (GSOPs) framework could be improved. The current format can be difficult to navigate and interpret.

We note that Ofgem has already moved its SLCs from PDF to HTML, making this an online, live and up-to-date document. However, it may be helpful to ensure that there is a simple way for users to convert this to PDF, where this is the user's preferred working format or supports easier searching by term.

Detailed drafting comments

In addition to the proposed changes outlined in Ofgem's consultation, we have also noted the points below, which could be considered within the scope of this housekeeping activity.

Electricity

SLC / Definition	Amendment
0.9	Should be yellow-highlighted with strikethrough to reflect that this is moving to SLC 1, as opposed to being simply deleted.
0A.9	Should be yellow-highlighted with strikethrough to reflect that this is moving to SLC 1, as opposed to being simply deleted.
Benchmark Metering Arrangement	Refers to 'this licence condition.' Should state which licence condition.
Credit (for the purpose of condition 9)	c) 'for the supply of gas…under a contract for the supply of gas' – assume this should be electricity?
Economy 7 Metering Infrastructure	(i) 'nigh/low' – should this be 'night'?
First Demand Guarantee (for the purposes of condition 30)	4. 'it provides for a compliant demand to state that, by reason of the insolvency of the licensee or revocation of the it licence or a failure by the licensee to pay' – remove 'it' or replace 'the it' with 'its'?
Green Deal Arrears Notice	a) And b) suggest replacing 'his' with 'their'.
Initial Period for the purposes of condition 4D	Replace 'M' with 'm'.
Licence Event	Replace 'M' with 'm'.
Metering Arrangement	Refers to 'this licence condition.' Should state which licence condition.

Prepayment Advanced Domestic Meter	'a Electricity Meter' should be 'an Electricity Meter'.
Proposed New Electricity Supplier	'a Electricity Supplier' should be 'an Electricity Supplier'.
Quarterly Progress Milestones	Replace 'M' with 'm'.
Relevant 28AD Customers	'Evergreen Supply Contact' – assume this should be 'Evergreen Supply Contract'?
Relevant Matters for SLC 22C	(a) Has an additional space between 'in' and 'the'.
Theft of Electricity	(a) Should be 'an electricity supplier'.
12.A.14	Strikethrough should be 'Not in use'?
12.A.15	Strikethrough should be 'Not in use'?

Gas

SLC / Definition	Amendment
Advanced Domestic Meter	'an Gas Meter' should be 'a Gas Meter'.
Credit (for the purposes of condition 9)	b) (iii) 'A Electricity Supply Licence' would be 'An Electricity Supply Licence' but should be 'a **Gas** Supply Licence' and 'for the supply of electricity to domestic premises…for the supply of electricity' – 'electricity' should be 'gas'?
Losing Supplier Loss Trigger	Please consider removing 'this'.
Market Stabilisation Charge	Please consider removing 'this'.
SLC 22D Exempt Information	(b) Not used – should be 'Not in use'.
7A.10C	Strikethrough – should be 'Not in use'?
22.16	Strikethrough – should be 'Not in use'?