Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

Email to: futureconsumers@ofgem.gov.uk

19 August 2026

Dear Graeme,

**Proposed changes to simplify the gas and electricity supply licence**

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 welcomes Ofgem's ambition to make the Standard Licence Conditions (SLCs) clearer, simpler and easier to navigate. We support the proposed changes, including removing obsolete or unused provisions, simplifying drafting, rationalising definitions and improving the structure of the licence. We would welcome confirmation from Ofgem that the proposed changes are non-substantive unless clearly stated otherwise. This would give suppliers certainty and help avoid unintended compliance risks.

However, while the proposed housekeeping changes may be somewhat helpful to those not familiar with the SLCs, they will not provide any real value or improvement to any supplier who is properly engaged with the licence and how it operates. It is therefore important that Ofgem recognises that this alone will not reduce any regulatory burden placed upon suppliers at all, and that much more is needed to modernise and simplify the SLCs to better encourage good outcomes for consumers and enable innovation. With this in mind, Ofgem should promptly build on these first set of proposed changes with wider and more meaningful reform, including the removal of obligations that are outdated, duplicated, overly prescriptive or that drive unnecessary cost without clear consumer benefit – this is what will actually add value and in our view have a greater impact in helping suppliers improve consumer outcomes.

This should happen quickly and should prioritise areas where licence requirements create unnecessary cost or complexity, and suppress or limit innovation including customer communications, smart metering and data, payments and debt, mature schemes, unnecessary assurance requirements, and temporary provisions that have been repeatedly extended.

Ofgem should also look to remove requirements that unnecessarily prescribe process rather than focus on customer outcomes, or requirements that duplicate other regulatory obligations, or limit innovation

such as smart data, Market-wide Half-Hourly Settlement (MHHS), dynamic tariffs and new customer propositions.

A more simplified licence is urgently needed and should focus regulation on areas of genuine customer risk, while maintaining consumer protections where needed. Where simplification opportunities are identified, Ofgem should rapidly review related obligations together to reduce repeated implementation costs and provide greater regulatory certainty. Above all, simplification should deliver a genuine reduction in regulatory burden, rather than simply removing obligations that no longer apply or moving requirements from licence conditions into guidance or other non-statutory documents.

## Priority areas for future reform

We have set out in the annex to this document a list of specific SLCs that we believe should be considered for urgent change. These are areas where reform could reduce unnecessary cost and complexity, support innovation while maintaining or better facilitating improved outcomes for consumers. Where simplification opportunities are identified, Ofgem should review related obligations together to reduce repeated implementation costs and provide greater regulatory certainty. Above all, simplification should deliver a genuine reduction in regulatory burden, rather than moving requirements from licence conditions into guidance or other non-statutory documents.

**Customer communications and engagement**

Ofgem should prioritise simplifying customer communication requirements by removing all unnecessary prescription and solely focus on clear consumer outcomes. For example, requirements relating to billing, tariffs, contract changes and annual statements should set the outcome and leave suppliers full flexibility to deliver these outcomes in the way they understand best meet consumers' needs while maintaining transparency, fairness and understanding.

**Smart metering and data**

Ofgem should review smart metering and data obligations to ensure they reflect today's market and support innovation. Requirements relating to data consent, In-Home Displays and access to consumption data should be simplified where appropriate, while maintaining appropriate safeguards for transparency, privacy and informed consent.

**Payments, debt and customer protection**

Ofgem should review obligations relating to transfer objections, Direct Debits and prepayment meters to ensure they remain proportionate and outcomes focused. Simplification should remove unnecessary prescription while maintaining strong protections for customers in debt or vulnerable circumstances, and without encouraging unintended outcomes or gaming.

**Mature schemes and assurance**

Ofgem should review assurance, reporting and audit requirements for mature schemes, including Feed-in Tariffs, Warm Home Discount, Payment Levelisation and the Smart Export Guarantee. Where existing requirements no longer reflect the level of consumer or market risk, they should be streamlined or removed.

**Temporary or repeatedly extended licence provisions**
Ofgem should review temporary licence provisions that have been repeatedly extended to determine whether they remain justified. Measures that no longer deliver proportionate consumer benefits should be removed or replaced with more targeted, outcomes-based requirements.

**Avoid shifting regulatory burden from licence to guidance**
Ofgem should ensure that licence simplification delivers a genuine reduction in regulatory burden rather than simply shifting obligations from licence conditions into guidance. Guidance should not create new de facto obligations or reduce transparency. Where guidance is used, Ofgem should clearly explain its status, its relationship to enforceable licence obligations, and where suppliers have flexibility, while ensuring it remains up to date and easily accessible. We also support consolidating ancillary guidance and supporting materials into a single, accessible framework to improve usability and help suppliers navigate regulatory requirements more effectively.

**Implementation and future engagement**
Ofgem should provide a clear implementation timeline for any licence changes following this statutory consultation, and how this aligns with Ofgem's ongoing consumer outcomes work. For future phases of licence reform, Ofgem should continue to engage closely with suppliers and consumer representatives to identify priority areas for simplification, supported by a clear assessment of both consumer benefit and operational cost.

In addition, Ofgem should clearly distinguish between administrative drafting changes, changes that remove obsolete or unused obligations, changes that consolidate or relocate existing obligations, and changes that alter policy intent or supplier obligations. Making these distinctions is essential, as it will enable suppliers to assess the impact of proposed changes, plan implementation effectively, and ensure that licence reform delivers genuine simplification rather than introducing further complexity.

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 the Ofgem website.

Yours sincerely



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

## Attachment
## Proposed changes to simplify the gas and electricity supply licence

**Question 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?**

Yes. We support amending unused SLCs to use the consistent term "Not in use", alongside minor drafting amendments to SLC titles where these improve clarity and usability. We agree that consistent terminology will make the licence somewhat easier to navigate.

**Question 2. Do you agree 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?**

Yes, we support the removal of licence conditions with expired end dates where they are no longer legally or operationally relevant.

However, Ofgem should clearly distinguish between conditions that are genuinely expired and those that have been extended, replaced or linked to ongoing obligations. The Energy UK / Ofgem workshop on this topic highlighted supplier concern that Ofgem should be careful where temporary provisions have been extended over time, particularly where there may be uncertainty about the current status of a condition.

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

Yes, we support removing licence provisions that are no longer relevant, especially where they relate to historic arrangements or market interventions that have since evolved.

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

Yes, we support the removal of licence conditions that are no longer relevant. Simplification should reduce unnecessary complexity and remove historic provisions that no longer support good consumer outcomes.

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

Yes, we support the removal of redundant conditions from both the electricity and gas supply licences.

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

Yes. We support consolidating definitions within SLC 1, where this improves clarity, reduces duplication and makes the licence easier to navigate. However, consolidation should be carefully managed. Ofgem should ensure that moving definitions does not change their legal meaning, scope or application. Where definitions currently apply only to specific conditions, Ofgem should make clear whether the definition is intended to apply more generally or remain limited in effect.

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

Overall, yes. We support Ofgem's proposed modifications as a positive first step towards a clearer, more proportionate and easier-to-use licence framework. The proposed housekeeping changes should improve accessibility for those not familiar with the licence by removing obsolete provisions, simplifying drafting and rationalising definitions.

However, housekeeping changes alone will not materially reduce regulatory burden. We encourage Ofgem to treat this consultation as the first phase of a wider programme of reform focused on obligations that are outdated, duplicated, unnecessarily prescriptive or no longer delivering clear customer benefit. We also encourage Ofgem to ensure that simplification genuinely reduces regulatory burden rather than relocating obligations from licence conditions into guidance.

Where guidance is used, Ofgem should ensure its status, purpose and interaction with licence obligations are clear. We would also welcome consolidation of ancillary guidance and supporting materials into a single accessible framework to improve usability.

**EDF**
**August 2026**

## Annex
## Specific SLCs for future amendment

### Customer communications, billing and engagement

**SLC 31F — Encouraging and enabling customer engagement**
Ofgem should review and amend SLC 31F to simplify requirements such as Cheapest Tariff Messaging, Estimated Annual Cost and tariff labels. These requirements are complex, prescriptive and may not be suitable for dynamic tariffs, Market-wide Half-Hourly Settlement and more innovative customer engagement approaches. The condition should be reframed around the outcome of helping customers understand and engage with their tariff options.

**SLC 31H — Relevant Billing Information, bills and statements**
Ofgem should review and amend SLC 31H to reduce prescriptive billing content requirements, including Relevant Billing Information and QR code requirements. The focus should be on whether customers receive clear, useful and understandable billing information, rather than requiring fixed information in all cases.

**SLC 31I — Contract change information**
Ofgem should review SLC 31I, particularly requirements linked to price cap change notifications. These communications can create significant operational cost, especially for non-digital customers, with limited evidence of customer engagement where customers are already protected by the price cap.

**SLC 51 — Customer access to consumption data**
Ofgem should simplify SLC 51 so that suppliers can provide consumption data in ways that better reflect customer needs and preferences. Current requirements are complex and vary by customer type, creating unnecessary system and process complexity.

### Smart metering and smart data

**SLC 25B — Advanced Domestic Meters**
Ofgem should consider removing or substantially amending SLC 25B. These obligations were aimed at early-generation smart meters and are now largely outdated, creating potential confusion alongside current smart metering obligations.

**SLC 39 — Smart metering installation**
Ofgem should amend SLC 39 to allow greater flexibility for microbusiness customers in choosing between smart and advanced metering options. This would allow suppliers to offer the most appropriate and cost-effective metering solution for the customer.

**SLC 40 — In-Home Displays**
Ofgem should amend SLC 40 to move away from a mandatory In-Home Display approach where

customers do not want or use the device. Customers should be able to choose how they access energy usage information, including through digital alternatives.

**SLC 47 — Smart meter consumption data consent**
Ofgem should simplify SLC 47, particularly where separate consent rules apply to settlement and non-settlement data. The current approach creates unnecessary system and process complexity, especially as Market-wide Half-Hourly Settlement becomes more embedded.

**SLC 49 — Smart meter operational requirements**
Ofgem should review SLC 49 where requirements to maintain pricing information on meters no longer support customer outcomes. This is particularly relevant for customers on dynamic tariffs or customers who do not use In-Home Displays.

### Payments, debt and customer protection

**SLC 14 — Customer transfer blocking**
Ofgem should review SLC 14 in relation to non-domestic customers on deemed contracts. The current approach may create a gap where suppliers cannot object to transfer for debt in the same way as for domestic customers.

**SLC 27 — Direct Debits and payments**
Ofgem should review SLC 27 and associated expectations so that suppliers can use accurate and up-to-date information, including forecast price changes, when setting payment arrangements. This would support prudent account management and help customers manage future bills.

**SLC 28 — Prepayment meters and Safe and Reasonably Practicable guidance**
Ofgem should review SLC 28 and associated guidance to ensure the framework protects customers while avoiding unnecessary operational prescription. A more outcomes-based approach could maintain safeguards for customers in vulnerable circumstances while enabling effective debt recovery and support.

### Mature schemes, assurance and audit

**SLC 33 — Feed-in Tariffs**
Ofgem should review SLC 33 because the Feed-in Tariff scheme is closed to new participants and is now embedded in business-as-usual processes. Ongoing audit and monitoring requirements should be reduced where they are no longer proportionate.

**Payment Levelisation and Warm Home Discount assurance requirements**
Ofgem should review assurance requirements linked to Payment Levelisation and Warm Home Discount where they duplicate Ofgem's own external audit arrangements. Removing duplicative supplier-side assurance would reduce cost without weakening oversight.

**SLC 57 — Smart Export Guarantee**
Ofgem should review SLC 57 to assess whether the current mandated Smart Export Guarantee

framework remains necessary in its current form, given the development of the export market and the wider range of export propositions now offered by suppliers.