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22 July 2026

E.ON[1] response to Ofgem's statutory consultation on Supply Licence Simplification

Dear Graeme,

Thank you for the opportunity to respond to Ofgem's statutory consultation on Supply Licence Simplification[2]. We welcome the government's objective of reducing administrative burden across the economy by 25% and ensuring regulation better supports economic growth. This work should contribute to that by making the supply licence clearer. However, this first phase will only deliver meaningful benefits if implemented quickly and used as a foundation for more substantive changes.

We recommend that Ofgem should:

- **Implement Phase 1 quickly**, publishing its decision promptly so that these 'housekeeping' changes can take effect well before the end of 2026[3].
- **Consolidate all forms of regulatory guidance** into a more accessible, comprehensive format, including all regulatory expectation letters (some of which aren't published[4]). This is a prerequisite for the Consumer Outcomes work to efficiently consider how rules/guidance need to change.
- **Use licence digitalisation to improve usability**, such as embedded links to definitions and guidance, and consider how Ofgem presents proposed licence changes.

Phase 2 should be accelerated to provide the foundations for successful implementation of the Consumer Outcomes project. The scope presented by Ofgem in April[5] appeared to include many of the activities being undertaken by the Consumer Outcomes implementation teams. Rather than treating these as separate exercises, we suggest Ofgem uses Phase 2 to quickly establish the underlying framework needed to support Consumer Outcomes, particularly through consolidation of guidance and regulatory expectation documents. This would address an issue already identified by Ofgem[6] and provide a clearer foundation for the outcomes-based regulation policy work.

We hope these comments are helpful and would be pleased to discuss any aspect of this response further.

Yours sincerely,

James Doig

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[1] This response is on behalf of E.ON Next and npower Business Solutions (licensed as Npower Commercial Gas Ltd).
[2] Proposed changes to simplify the gas and electricity supply licence | Ofgem
[3] Ofgem said "We aim to implement relevant changes before the end of the year" at the Non-Dom Reg Dirs Mtg (Jun 2026)
[4] A recent example of an unpublished letter is the 'win-back' clarification letter (17 June 2026)
[5] Licence simplification workshop (9 April 2026). Ofgem wrote that Phase 2 would include "assessment of SLCs against broad consumer outcomes work … identify areas that can be streamlined … identify overly prescriptive areas of the SLCs".
[6] Energy consumer outcomes: proposed implementation | Ofgem para 4.56

Responses to the questions

Q1. 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. Given Ofgem believes it can make presentational changes to the licence without consultation that "do not alter the content or meaning of the licence conditions"[7] Ofgem should proceed at pace.

Q2: 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 agree these conditions have historic end dates and they can be removed.

Q3: Do you agree that SLC 25E of the electricity supply licence is no longer relevant and could be removed?

Yes, on the basis that we presume Ofgem has discussed this proposal with government, who are content that the specific powers the Secretary of State has through this SLC are unlikely to be required in the future.

Q4: Do you agree that SLC 21A of the electricity and gas supply licences is no longer relevant and could be removed?

Yes.

Q5: Do you agree that SLC 56, of the electricity supply licence & SLC 50 of the gas supply licence, are no longer relevant and could be removed?

Yes.

Q6: Do you agree with consolidating definitions within SLC 1, as much as possible?

Yes, although we suggest Ofgem consider how consolidating definitions may make navigating the supply licence more difficult. We believe Ofgem's Electronic Public Register (EPR) could benefit from hyperlinks, pop ups, or similar from defined licence terms to their definitions.

Ofgem should also review existing guidance to check whether updates are necessary due to the removal of paragraphs. Existing guidance has references to the paragraph numbers of some of the definitions that are being removed. For example, the Standards of Conduct Guidance[8] has explicit reference to SLC 0.9/0A.9 in page 8, para 4 on the fairness test, which are the first two paragraphs that Ofgem proposes to remove.

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

Yes. However, we note that the PDF version of the supply licence published alongside this consultation[9] (consolidated to 31 March 2026) has been superseded by changes in the EPR to the paragraphs that Ofgem proposes to change (e.g., on 10 June 2026 para 1.2 was changed). This suggests **Ofgem should adapt its consultation process as it moves to digital licences to make it easier for stakeholders to compare the impact of the proposed changes**.

There are further typographical errors that Ofgem should address as a matter of course (e.g., "form" rather than "from" in 14.2A, and "Contracts" plural in the title of 22C.3.).

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[7] Consultation para 2.5.
[8] Standards of Conduct Guidance
[9] Electricity Notice Licence Simplification Modification