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Consultation response: supply licence simplification

Dear Graeme,

We are writing to respond to the consultation on supply licence simplification.

We have no objections to the specific proposals in the document. However we are concerned about the regulatory priority and resource being allocated to this exercise as these proposals will have a negligible impact on how suppliers interact with the regulations. The changes are largely superficial and therefore will not make a meaningful difference to making regulation simpler, easier to understand, or easier to comply with.

Ofgem's time and effort would be far better spent on the more substantive issue of how to actually simplify the core regulatory framework and associated guidance documents. It is critical that minor exercises like this do not act as a distraction from priority workstreams that need to proceed at pace, such as the consumer outcomes work. Ofgem should consider how it can rationalise its active workstreams to enable high-priority activities to move more quickly.

Furthermore, we would like to stress that we do not believe that page or word count is a meaningful metric for regulatory simplification - and not something Ofgem should be using as a primary measure of success. In fact, superficial changes like removing page breaks could risk making the licence harder to read.

Going forwards, we urge Ofgem to consider a more streamlined process for minor formatting and administrative updates rather than full consultation processes to avoid wasting both regulatory and industry capacity. This kind of work should be 'business as usual,' rather than forming the basis for substantive reviews of the licence or in response to concerns about regulatory burden.

We are happy to discuss the above if helpful

Yours sincerely,

Anne-Marie Spalding
Head of Regulation and Policy
Octopus Energy Limited