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Dear Graeme

Supply licence simplification

We welcome the opportunity to respond to Ofgem's consultation on supply licence simplification. Clearer licence drafting and easier navigation will support consistent interpretation of obligations, reduce unnecessary administrative burden and enable suppliers to focus resources on delivering positive customer outcomes. We therefore support Ofgem's efforts to streamline the licence framework while preserving the existing intent and effect of regulatory requirements. We recognise that this work sits alongside Ofgem's wider Consumer Outcomes programme and provides a cleaner and more manageable licence framework to support future regulatory developments.

While we welcome Ofgem's efforts to improve accessibility through the move to the Electronic Public Register (EPR), our experience is that the current platform remains difficult to navigate and search effectively. In particular, the search functionality does not work efficiently when searching within an individual set of licence conditions and can return results from across multiple licence types, making it difficult to locate the relevant provisions. We have not found that the move to EPR has improved accessibility or usability and, in practice, the previous PDF versions of the licences were considerably easier to search and navigate. In particular, the 'Advanced Search' functionality in PDF documents shows a list of matches rather than having to step through each and allows searches to specify 'whole words only' and case sensitivity. Together these functions make it much easier to search and navigate a document than the simple 'Control F' functionality available on a web page.

It would be beneficial for EPR users to be able to:

- search effectively within a specific licence
- navigate easily between licence conditions
- move directly between defined terms and the provisions in which they are used
- follow cross-references quickly and intuitively.

We would encourage Ofgem to consider an approach similar to the legislation.gov.uk website, where documents are presented in an accessible HTML but with the option for

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users to generate or download a PDF version. Providing both formats would help accommodate different user needs and would improve the practical usability of the licence framework for stakeholders undertaking detailed regulatory and compliance analysis.

Improvements in these areas would materially enhance the usability of the licence framework and better support Ofgem's objective of making the regulatory framework easier for stakeholders to access and engage with.

We particularly welcome Ofgem's proposal to consolidate definitions within SLC 1 wherever practicable. Definitions are a critical component of licence interpretation, and a more centralised approach should improve accessibility, consistency and ease of use. Consolidating definitions should reduce duplication, make defined terms easier to locate and help stakeholders navigate licence requirements more efficiently.

The proposed changes should make the licences easier to navigate, interpret and apply in practice. The removal of outdated content, improved consistency of drafting conventions and a more coherent approach to definitions should all contribute to a more streamlined and accessible regulatory framework.

We would welcome further clarity on the governance arrangements that will apply going forward to maintain the licence framework. It would be valuable for Ofgem to set out what processes will be introduced to ensure that obsolete licence conditions, expired provisions and duplicate definitions are identified and removed promptly going forwards. Establishing an ongoing maintenance process would preserve the benefits delivered through this simplification exercise and reduce the need for similar large-scale housekeeping reviews in the future.

We welcome Ofgem's ongoing commitment to ensuring the regulatory framework remains effective, transparent and easy for stakeholders to navigate, and we look forward to supporting future initiatives aimed at further enhancing the clarity and accessibility of the licence regime.

Yours sincerely,



Richard Sweet
Director of Regulatory Policy