(Sent via email)

Dear Ofgem Colleagues

Utilita supports Ofgem's objective of making the supply licences easier to navigate and welcomes the removal of obsolete conditions and consolidation of definitions.

However, we are disappointed by the limited scope and ambition of the proposals. Given the broader policy backdrop, including ongoing market reform discussions, we expected Ofgem to deliver a more substantive package of licence simplification. Almost a year on from the wider debate around regulatory modernisation, this consultation feels like a missed opportunity.

The proposals focus largely on drafting changes and administrative tidying-up rather than addressing the underlying causes of regulatory complexity. We believe Ofgem could have gone significantly further by reviewing and removing legacy policy requirements that no longer deliver meaningful consumer benefit and by addressing long-standing licence provisions that act as pinch points or barriers to innovation.

A genuine simplification exercise should seek not only to make the licence easier to read, but also easier to comply with, more proportionate, and better suited to supporting innovation, new business models and the future energy system.

We would therefore encourage Ofgem to treat this exercise as a first step and to bring forward a more ambitious programme of licence modernisation focused on removing outdated requirements, reducing unnecessary regulatory burden and eliminating barriers to innovation.

Thank you for your consideration

Faye

