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By e-mail only: ger@ofgem.gov.uk

Dear Barry

Statutory consultation on the modification of standard conditions of electricity supply licences to enable the delivery of the Government Electricity Rebate

Thank you for the opportunity to comment on Ofgem's updated proposals regarding the modification of relevant licence conditions to enable the delivery of the Government Electricity Rebate (GER).

We agree that a licence modification is appropriate in order to ensure that there is a clear framework for administering the rebate and that all electricity suppliers apply the rebate in the same way.

Many of our previous queries have been addressed and we support the overall approach to the rebate with regards to minimal formatting changes on bills or statements and the exclusion of the rebate from Personal Projections and TCR calculations.

E.ON agrees with Ofgem that the terms of the direction need to be proportionate and would ask that Ofgem and DECC be mindful of this when defining their monitoring and reporting requirements, to ensure they follow this principle and avoid unnecessary duplication.

We continue to have concerns regarding the tight timelines and high administration costs relative to the value to consumers of delivering the rebate.

We also have concerns in relation to inconsistencies between DECC's GER

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consultation, the draft version of Ofgem's 'Government Electricity Rebate: Guidance for Licences Electricity Suppliers' and the draft version of the Secretary of State's Direction. We appreciate that the latter two have been described as being early drafts and that Ofgem and DECC are working towards addressing any misalignment issues. We anticipate that the updated versions of these documents and additional guidance from DECC on the re-imbursement process will provide more clarity.

I hope that these comments are helpful, but would be happy to discuss our views in more detail.

Yours sincerely

Michael Lain
Commercial Regulation

