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Dear Sirs

## Ofgem's proposal to revise the Typical Domestic Consumption Values for gas and electricity

Thank you for the opportunity to comment on the above proposal.

We remain supportive of the methodology used to calculate the TDCVs and note that the new values reflect the further improvements in energy efficiency over the past two years.

We support the move to a September effective date as we believe this will be less confusing for customers and simpler for suppliers than the current mid-winter date. We would support moving the effective date for future revisions to June/July.

We understand the reasons for using a different consumption dataset for the Supply Market Indicators to those used for the TDCV. However the difference continues to cause confusion and misinformation in the media and we would welcome a review of whether the benefits of using different datasets outweigh the disadvantages.

We note that Ofgem, in its 2013 decision document for TDCVs, stated that it will be reviewing the assumed day/night split for profile class 2 meters as part of the work to develop a Tariff Comparison Rate for this profile class. We continue to believe the current percentages do not accurately represent usage for most customers and are keen to participate in discussions regarding this.

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Yours faithfully

Graham Kirby

Specialist Regulatory Expert