

Dennis Berg  
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Friday 16<sup>th</sup> September 2016  
via Email to: dennis.berg@ofgem.gov.uk

Dear Dennis,

Thank you for the opportunity to review the open consultation with regards to the proposed removal of certain RMR licence conditions and provide a response.

Having considered the impacts of the proposed removal of certain licence conditions we take no issue with the proposed changes. We agree with your assertion that their removal will give suppliers more freedom to innovate and this has the potential to deliver benefits to consumers. The freedom presented by the changes may create greater opportunity for abuse by unscrupulous parties, therefore it is important that the monitoring and evaluation of suppliers' fairness is a critical point of fairness and misconduct is policed and penalised appropriately. We appreciate that you have alluded to using market monitoring data to identify trends in customer complaints for example, however this would be retrospective rather than a preventative measure.

To support the proposed changes that you are considering we would ask that clear guidance is issued on two particular areas of current regulation in terms of Collective Switching & Derogations. Good Energy have participated in a number of collective switch bids and therefore interested in the impact that the removal of the licence condition (SLC22B.38) will have. With regards to derogations, Good Energy has derogation against SLC22B.4, our assumption is therefore that the derogation will no longer be required and we will become compliant by default when the obligation is removed.

Given the dependency of the open consultation in relation to Clearer Information tools against this proposed change we would request that both remedies are combined and interlinked to ensure both can be delivered together. Should these changes be made separately it could result in a period of time where the licence conditions are inconsistent and in conflict.

We look forward to your response to this consultation in due course.

Kind Regards,



**Peter Berry**  
**Senior Compliance Manager**  
**Good Energy**