



Sophie Adams
Economist, Consumers and Competition
Ofgem
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London
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12 July 2017

Dear Sophie,

Ofgem's proposal to revise the Typical Domestic Consumption Values for gas and electricity, including additional information on the peak and off-peak split for Economy 7 meters, and on the mean consumption for restricted meter customers.

Thank you for the opportunity to comment on the proposed new Typical Domestic Consumption Values and peak and off-peak split for Economy 7 meters. EDF Energy supports the proposed typical consumption values, and implementation date for the new values of 1 September 2017.

Peak and off-peak split for Economy 7 meters

We note that the Department for Business, Energy and Industrial Strategy's consumption split values were calculated in 2010, and recognise that there have been significant changes in domestic customer energy usage and behaviour since that time. It is important that estimated values used is based on up-to-date information, and support updating the consumption split used to calculate the typical bill for an Economy 7 customer.

Changes in usage and customer behaviour have been reflected several times in updated the Typical Domestic Consumption Values, and we believe it is appropriate to adopt Ofgem's proposed new consumption split, of 58% Peak, and 42% Off-peak usage. This will ensure that customers with Economy 7 meters are provided with more accurate estimates of typical usage where estimated consumption split values are used.

Prepayment Charge Restriction

We see no reason or benefit from delaying using the updated split for the Prepayment Charge Restriction until February 2018, and do not consider that there would be any additional burden on Suppliers to use the new values for the charge restriction period beginning in October.

We support the adoption of the new values and believe it is logical that Ofgem adopts the new consumption split values for the October 2017 Prepayment Charge Restriction calculations, as this aligns with the adoption of the consumption split proposed for use from 1 September 2017.

Should you wish to discuss this further or have any queries, please contact Kevin Hammond on 01273 428 521, or myself.

I confirm that this letter may be published on Ofgem's website.

Yours sincerely,

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A handwritten signature in blue ink that reads "Paul Delamare".

Paul Delamare
Head of Customers Policy and Regulation

EDF Energy
July 2017