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21 July 2017

### **Standards of Conduct for suppliers in the retail energy market – Statutory Consultation**

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, storage, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

In our response to earlier consultations on the proposed changes to the Standards of Conduct (SoC) we expressed concerns with elements of Ofgem's policy proposals, in particular regarding the changes to the fairness test and the compliance threshold. We continue to have concerns with these proposals and the potential for them to increase regulatory risk and stifle innovation.

However, we are keen to work with Ofgem in its transition from prescription to a more principles based regulatory model, as demonstrated by our support for the introduction of the original SoC. In terms of this statutory consultation, we believe that Ofgem has made appropriate licence condition amendments that implement its policy decision on SoC changes.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Steven Eyre on 01273 428348, or myself.

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

Yours sincerely,

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

**Paul Delamare**  
**Head of Customers Policy and Regulation**