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Andrew Thomsen
Future Retail Regulation
Sent by email only
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OVO Energy Response to Statutory Consultation on Standards of Conduct

Dear Andrew,

OVO Energy welcomes the opportunity to respond to the above consultation and appreciates the work that has gone into the consultation process, and the collaborative approach adopted by Ofgem. We strongly support the move to principles based regulation (PBR) to promote competition and innovation amongst suppliers, and ultimately facilitate positive outcomes for consumers.

OVO are generally supportive of the changes proposed and can see the value in each of the separate propositions made. We strongly support moving the Standards of Conduct to the front of the licence conditions, reflecting the overarching importance of the Standards whilst making them much more accessible.

We would, however, reiterate our concern around the risk of duplication within the licence, where both broad and narrow principles are introduced covering similar material, such as informed choices. We acknowledge that the broad principle covers a wider scope than the narrow informed choices principles, and therefore question the need for narrow principles if the broad principle covers all activity. We therefore request that Ofgem considers the need for both broad and narrow principles carefully in the future development of principles based regulation, and monitors their effectiveness as PBR becomes embedded within the licence.

We have been actively engaged in the Energy UK review of customer communication supply licence conditions, and we welcome the ambitious approach being taken in this proposal. We strongly believe that the Standards of Conduct are sufficient to ensure that customers are protected and it is in a supplier's interests to communicate with its customers appropriately. We are keen to continue to work with Energy UK and Ofgem as this work develops.

If you have any questions concerning these views please do not hesitate to get in touch.

Kind regards,

Jennifer Mann

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