



Rachel Fletcher
Senior Partner, Consumer & Competition
The Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE

Opal Gas
PO Box 818
Harrogate
HG1 9XE

Tel: 0330 400 4444

10th November 2017

**Opal Gas response to the Ofgem statutory consultation for a
vulnerable customer safeguard tariff.**

Opal Gas is a relatively new and very small energy supplier, holding both commercial and domestic licences for both natural gas and electricity.

At the time of writing (November 2017) Opal Gas does not have an electricity supply chain and as such does not trade electricity, however we do supply in the region of sixty (60) commercial natural gas meters and one (1) domestic natural gas customer.

We recognise the need for suppliers to provide protection to vulnerable domestic customers, and especially those who may be unable to access the wider market, or have little knowledge of the opportunity to switch supplier. We therefore welcome the implementation of the proposed safeguard tariff.

Because Opal Gas do not currently supply electricity we not a dual-fuel supplier, or a Warm Home Discount Compulsory Supplier. Subject to compliance with the Smart Energy Code, we do intend to increase the number of domestic natural gas customers in 2018, but only on a basis of 'Family and Friends' as opposed to an advertised offering to the general public. Should we extend domestic gas to the wider public in 2019 and begin trading in the domestic electricity market, then due to the number of customers required, it is extremely unlikely that Opal Gas would become a WHD supplier by December 2019, when the proposed Government price cap is put into place.

As matter of clarity, the single domestic customer that Opal Gas currently supplies is a former director of the company, and would not qualify as a vulnerable customer. Standard payment terms are direct debit, and we do not currently supply any prepayment meters.

We note the requirement for a Priority Service Register (PSR), and will put this into place as we grow our domestic customer base, in order to monitor the needs of any vulnerable clients.

Graham Wright
Operations Director
Opal Gas