

Dear Dennis

Please accept my apologies for the late reply, I understand the time for sending responses to the Statutory Consultation closed yesterday however, I hope this response is able to be considered. We did not feel it appropriate to issue a formal written response as we echo the points raised in Energy UK's response. However, we would reiterate our main concern regarding the prescriptive requirements set out in SLC 21BA.4 which requires Licensees to ensure their terms and conditions reflect the effect of SLC21BA. We consider that a principle would lead to better consumer outcomes, as it places the onus on suppliers to decide how best this message should be communicated (as discussed in Ofgem's Working Paper: domestic supplier-customer communications rulebook reforms).

We agree that consumers should be protected from the shock and financial hardship of catch-up bills for unbilled consumption older than 12 months. We also consider that voluntary codes alone do not offer adequate protection or consistency across suppliers in the market. Therefore, we are generally supportive of Ofgem's intention to introduce licence obligations for backbilling.

Kind regards

Faye



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