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20 June 2018

Policy consultation: Domestic supplier-customer communications rulebook reforms

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.

We welcome these proposed changes to domestic customer communications. However, the scope of the changes should go further in certain areas. Notably, around the provision of the Tariff Information Label and Estimated Annual Costs at the same time as the Principal Terms. We recommend that Ofgem removes licence condition paragraph 31E.8 to enable suppliers to better enact the policy intent of the supplier-customer communications reforms, and provide such information at the most relevant point for the customer, rather than due to prescriptive requirements. Key is to provide suppliers with the flexibility to enable customers to receive the right information, at the right time, in the right form.

We are concerned that, in requiring a supplier to "provide Bills", the proposed principle contradicts the current SLC 21B.5 licence requirement to "make available a Bill or statement of account" at least twice yearly. Paragraph 21B.5 was introduced into the licences by government to implement a European Directive requirement. We note that Ofgem states that regulation introduced by government, or EU requirements are out of scope of this project. We therefore consider modification of 21B.5 to be outside of scope.

Furthermore, we recommend that Ofgem removes the requirement for a supplier to provide the customer with both the Relevant Cheapest Tariff and Alternative Cheapest Tariff at Key Engagement Points. Suppliers should only be required to provide the cheapest tariff available to the customer according to their characteristics and preferences, in line with Condition 25 Informed Choices.

We do question whether removing the prescribed requirement for gas safety and carbon monoxide information is in the best interest of consumers. Doing so will mean that suppliers take different approaches in this area which will make it challenging for third parties and trusted intermediaries to advise customer where such information can be found. Therefore, if Ofgem do not retain this then they should seek the views from consumer bodies to ensure they are content that supplier will take different approaches in this area.

In Annex 1 we have provided a number of recommendations for changes to the detailed wording of the principles to provide more clarity and to ensure these are aligned with the policy intent as outlined in this consultation document, as well as aligning to wider licence wording used elsewhere. However, we have not been able to review the detailed changes to the wider licence wording which has limited our ability to consider these fully. Due to the breadth and impact of these changes we recommend that Ofgem hold a detailed workshop for all suppliers to review these proposed changes in detail, when they become available for review.

Our current understanding is that Ofgem do not propose to allow suppliers to implement changes prior to all of these licence amendments being finalised. We would strongly urge that this decision is reconsidered so that we can make changes to our customer communications to the benefit of customers as early as possible. This could either be via confirming that enforcement against these changes would be deprioritised when the Statutory Consultation is published; introducing a fast track derogation approach where suppliers wish to make changes earlier which are compliant the Statutory Consultation recommendations; or, by providing market wide derogation to certain aspects e.g. the requirement to provide Annual Statements.

A key area of concern is how Ofgem's compliance framework will be amended to take account of the changes proposed in the consultation. Clarity in how Ofgem will expect suppliers to ensure there is no customer detriment, caused by any changes made to their communications, would be beneficial. Otherwise, innovation could be stifled as suppliers could carry out activity to ensure there is not any possible customer detriment, with appropriate customer insight etc; however, through unforeseen circumstances truly innovative approaches could lead to unexpected outcomes. Ofgem should clarify that in such circumstances as long as a supplier has acted responsibly and acts immediately to mitigate any detriment as soon as this becomes clear, for example via continuous improvement and customer feedback processes, then they will not be subject to enforcement action.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact John Mason on 07875 117690, or myself.

I confirm that this letter and its attachment 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

Attachment

Policy consultation: Domestic supplier-customer communications rulebook reforms

EDF Energy's response to your questions

Q1. Do you agree in general with our proposed reforms to the rules related to supplier-customer communications?

We agree in general with the proposed policy reforms and support the move away from prescriptive rules and the introduction of a principles-based approach. However, some of the wording in the principles could still lead suppliers to take a prescriptive approach due to concern as to how Ofgem will enforce these e.g. wording such as '*throughout the year*'. If Ofgem wishes to ensure there are minimum standards of what it determines is acceptable from suppliers then these should be clearly prescribed in the licence to provide clarity. Otherwise, Ofgem should provide suppliers with the flexibility they need to consider their customers characteristics and preferences and meet the broader requirements of the principles.

In Annex 1 we have provided a number of recommendations for changes to the detailed wording of the principles to provide more clarity and to ensure these are aligned with the policy intent as outlined in this consultation document, as well as aligning to wider licence wording used elsewhere. However, we have not been able to review the detailed changes to the wider licence wording which has limited our ability to consider these fully. Due to the breadth and impact of these changes we recommend that Ofgem hold a detailed workshop for all suppliers to review these proposed changes in detail, when they become available for review.

Q2. Do you think our proposals make appropriate use of principles and remove the right amount of prescription? Have we gone too far, or not far enough in removing prescription to enable suppliers to innovate?

The proposed principles allow for the removal of prescribed information that has ceased to benefit consumers, such as providing the customer with the postal address of their distribution network operator.

We would welcome Ofgem to go further and amend the top-down nature of the licence definition of Principal Terms, as a customer may have a different view of what information is most significant to them according to their characteristics and preferences. A prescribed list of Principal Terms does not reflect the key information about innovative contractual arrangements, and may detract from the information the customer is likely to require.

Additionally, we recommend that Ofgem removes paragraph 31E.8, which requires the provision of the Tariff Information Label and Estimated Annual Costs at the same time as Principal Terms. Our understanding is that this paragraph is currently intended to be

retained. We question whether suppliers can truly vary the timing of communications, or apply the spirit of the proposed principles where prescriptive regulation contradicts the policy intent, to enable customers to receive the right information, at the right time, in the right form. Customers may not welcome receiving all of the required information within the Tariff Information Label, if it is not relevant to their interaction with the supplier. Where it is relevant, that information will be required by the new proposed principles in conjunction with existing Condition 0 Standards of Conduct and Condition 25 Informed Choices.

We recommend that Ofgem removes 31E.8 to enable suppliers to better enact the policy intent of the supplier-customer communications reforms. In Annex 2 we provide track change recommendations for amendments to the communications rules changes tables Ofgem included as Annex 1 to the policy consultation.

Furthermore, we recommend that Ofgem removes the requirement for a supplier to provide the customer with both the Relevant Cheapest Tariff and Alternative Cheapest Tariff on Bills, Statement of Renewal Terms, and disadvantageous unilateral variation notices. Suppliers should be required to provide the cheapest tariff available to the customer according to their characteristics and preferences, in line with Condition 25 Informed Choices.

Q3. Do you think there are any areas of particular risk to Vulnerable Consumers that are not already addressed in this consultation and/or by the vulnerability principle in the Standards of Conduct?

EDF Energy agrees that, alongside the Standards of Conduct, the proposed principles will provide more flexibility for suppliers to provide communications to relevant customers in a manner which suits their characteristics and preferences. We note that Condition 26 requires that suppliers make communications available in an accessible format, where reasonably practicable, based on that customer's characteristics and preferences.

We understand the need to balance principles with firmer requirements for providing customers with certain information, such as in relation to gas safety and the dangers of carbon monoxide. However, this does mean that for such information third party intermediaries will no longer be able to advise consumers as to where such information can be found as different suppliers will be able to take different approaches. If this is Ofgem's intent then they should ensure that all consumer groups are content with such an approach.

The proposed 'assistance and advice' principle and Standards of Conduct will ensure that customers in emergency situations are provided with appropriate outcomes for their circumstances,

Q4. Do you support our proposed changes to the rules regarding the (i) content, (ii) format, layout and wording, and (iii) frequency and timing of communications? If not, why not?

We agree that suppliers should be able to communicate with customers, establishing their own standards of service and preferred practice. Customer research and insight demonstrates that the current prescriptive rules for the content, formatting and timing of customer communications do not meet the expectations of each customer.

We welcome the opportunities a more principles-based approach provides suppliers to provide more flexibility to communicate in a manner that suits the customer's characteristics and preferences.

However, one potential barrier to a swift implementation of the changes to the format, frequency and timing of communications is the binding provisions of the licences, which require that set information is included within the terms of customer contracts. Examples of this include the following paragraphs, which require domestic contract terms and conditions reflect the proposed removed requirements of:

- 23.9 and 23.9A. Terms of Domestic Supply Contracts (disadvantageous variation).
- 31A.12 and 31A.13. Terms of Domestic Supply Contracts (Annual Statements).

We recommend that Ofgem clarifies that suppliers may vary the terms of existing fixed term contracts within the limited scope of these proposals to enable customers on those contracts to benefit from the changes driven by the customer communications reforms. Without this clarification, it may be that suppliers are unable to implement changes until existing fixed term contracts expire.

As detailed in our response to Question 2 and Question 7, we recommend that Ofgem removes paragraph 31E.8. It will be challenging for suppliers to vary the timing of communications, or apply the spirit of the proposed principles where prescriptive regulation contradicts the policy intent, to enable customers to receive the right information, at the right time, in the right form.

Q5. Do you agree with the key features of the new principles: (i) "Key Engagement Points", (ii) "characteristics and preferences", and (iii) our expectations of suppliers?

We welcome the flexibility that the key features will give to suppliers when communicating with customers and agree that, over time, we should see greater differentiation between suppliers.

Q6. Do you agree with our package of proposals to change the current customer communications rules to "encourage and enable" engagement? Please explain your answer, in particular noting any consequences you envisage for consumer outcomes or suppliers' ability to innovate.

How customers choose to engage with suppliers regarding their options in relation to their energy supplier has changed over time, and will continue to change; over recent years engaged customers have adopted online account management and self-service

channels. The proposed principles will provide suppliers with greater flexibility to communicate with customers in a variety of methods, and using alternative formats, which may be developed in the future.

Q7. Do you agree with our definition of Key Engagement Points?

The definition of Key Engagement Points is very broad, but we do not propose that it should be more prescriptive.

We recommend that suppliers should not need to provide all the information at every key engagement point, and should have the flexibility to supply the right information at the right time. As with our responses to Question 2 and Question 4, we recommend that Ofgem removes paragraph 31E.8. It will be challenging for suppliers to vary the timing of communications, or apply the spirit of the proposed principles where prescriptive regulation contradict the policy intent, to enable customers to receive the right information, at the right time, in the right form.

Q8. Do you support our package of proposals to change the current customer communications rules to ensure consumers are aware of, and can obtain, “assistance and advice”? Please explain your answer, in particular noting any consequences you envisage for consumer outcomes or suppliers’ ability to innovate.

We support the proposed changes. The current rulebook was written at a time when alternative communication channels, such as social media, were less developed. Advances in the features, affordability, and proliferation of technology provide customers with a broader range of opportunities to seek advice, in addition to a supplier’s written communications, telephone services, and website.

The current prescriptive licence requirements do not reflect the sources of assistance that are actually available to customers, and the proposed changes will enable suppliers to further innovate to deliver better customer outcomes.

We do question whether removing the prescribed requirement for gas safety and carbon monoxide information is in the best interest of consumers. Doing so will mean that suppliers take different approaches in this area which will make it challenging for third parties and trusted intermediaries to advise customer where such information can be found. Therefore, if Ofgem do not retain this then they should seek the views from consumer bodies to ensure they are content that supplier will take different approaches in this area.

The proposed principles supplement the requirements on suppliers, and powers Ofgem already has, under the Standards of Conduct and Consumer Complaints Handling Standards Regulations to ensure that suppliers make it easy for a customer to contact them in relation to customer service arrangements.

Q9. Do you support our proposed changes to the customer communications rules relating to “Bills and billing information”? Please explain your answer, in particular noting any consequences you envisage for consumer outcomes or suppliers’ ability to innovate.

We support Ofgem’s proposal that the bill focusses on its core purpose, and support the removal of the prescriptive requirements regarding the content and formatting of information on the Bill.

However, requiring a supplier to “*provide Bills*” contradicts the current SLC 21B.5 licence requirement to “*make available a Bill or statement of account*” at least twice yearly. We consider modification of 21B.5 to be outside of the intended scope of this policy consultation, and propose modification of Principle 4 to replace “*provide*” with “*make available*”, to ensure consistency with the legal drafting of 22B.5.

Q10. Do you agree with the distinction between billing information and Bills?

We agree with the distinction between billing information and Bills. It may be appropriate to provide certain information on a written Bill or statement of account, such as contact details of independent sources of advice. However, it would not be practicable to provide these wherever billing information is provided, such as during a customer service telephone conversation, where it is not expected or required by the customer.

Q11. Do you agree our principle reflects the different needs and circumstances of different customer groups, including prepayment customers?

We are concerned that, in requiring a supplier to “provide Bills”, the proposed principle contradicts the current SLC 21B.5 licence requirement to “make available a Bill or statement of account” at least twice yearly. Customers with Prepayment Meters do not receive a bill requesting payment, as they pay in advance for their electricity and gas. The requirements of 21B.5 reflect this.

Paragraph 21B.5 was introduced into the licences by government through The Electricity and Gas (Billing) Regulations 2014¹, which implemented Directive 2012/27/EU of the European Parliament and of the Council². We note that in paragraph 5.5, on page 35 of the policy consultation document, Ofgem states that regulation introduced by government, or EU requirements are out of scope of this project. We therefore consider modification of 21B.5 to be outside of the intended scope of this policy consultation.

Q12. Do you support our proposed changes to the customer communications rules relating to “contract changes”? Please explain your answer, in

¹ <http://www.legislation.gov.uk/uksi/2014/1648/made/data.pdf>

² <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012L0027&from=EN>

particular noting any consequences you envisage for consumer outcomes or suppliers' ability to innovate.

We support Ofgem's proposed changes. However, we would need to review the legal drafting of the licence condition modifications to understand how the proposed changes to the timing of sending the disadvantageous variation and statement of renewal terms work in practice with:

- The prescribed timings of the "price hold" period for disadvantageous variation; and,
- 49-day Switching Window for the statement of renewal terms, as defined by Condition 24.

As with our response to Question 4, one potential barrier to a swift implementation of the changes to the "contract changes" rules is the binding provisions of the licences, which require that certain information is included within the terms of fixed term customer contracts.

Examples of this includes the following paragraphs, which require domestic contract terms and conditions reflect the proposed removed requirements of:

- 23.9 and 23.9A. Terms of Domestic Supply Contracts (disadvantageous variation);
- 22C.13 to 22C.14. Terms of Fixed Term Supply Contracts (statement of renewal).

We recommend that Ofgem clarifies that suppliers may vary the terms of existing fixed term contracts within the limited scope of these proposals to enable customers on those contracts to benefit from the changes driven by the customer communications reforms. Without this clarification, suppliers may be unable to implement changes until existing fixed term contracts expire. Ofgem is able to facilitate this through the exception to compliance with condition in paragraph 22C.10.

Q13. Do you agree with our proposal to no longer require suppliers to provide Annual Statements?

Consumer research has demonstrated that customers are not benefiting from the requirement to provide the current prescribed Annual Statement.

EDF Energy agrees with Ofgem's proposal and supports the removal of the requirement to send an Annual Statement.

However, we recommend that the scope of the changes should go further in certain areas. Notably, around the provision of the Tariff Information Label and Estimated Annual Costs at the same time as the Principal Terms. We recommend that Ofgem removes licence condition paragraph 31E.8.

Furthermore, we recommend that Ofgem removes the requirement for a supplier to provide the customer with both the Relevant Cheapest Tariff and Alternative Cheapest Tariff at Key Engagement Points. Suppliers should only be required to provide the

cheapest tariff available to the customer according to their characteristics and preferences, in line with the Condition 25 Informed Choices.

Q14. Do you agree that the intended outcomes of the Annual Statement are reflected in our proposed new principles?

We agree that the proposed changes will enable suppliers to provide information to customers at times where it is most useful, and will have a positive effect on engagement. The proposed new principles, with the minor amendments we have suggested, are appropriate to enable suppliers to achieve better customer outcomes than the existing prescriptive requirements to send a one-size fits all Annual Statements.

**EDF Energy
June 2018**

Annex 1

Below we have provided track change recommendations for amendments to the principles that are provided in the document, with our reasons for these changes.

Encourage and Enable Contract choices

1. The licensee must ensure that it ~~provides~~ *makes available* information, services and/or tools for each Domestic Customer at ~~all relevant~~ Key Engagement Points and throughout each year that, taking into account that Domestic Customer's characteristics, preferences and current Tariff, ~~is effective in to:~~
 - a. ~~Enabling that Domestic Customer to understand that they can switch Tariff and Energy Supplier, and how they may benefit financially from doing so.~~
 - b. ~~Encouraging that Domestic Customer to consider their options relating to contracts and terms, including their choice of Tariff.~~

- It is recommended that '*provides*' is changed to '*make available*' as through innovative technology such information may not be defined as being 'provided' until the customer accesses this e.g. if they are able to make a live update to receive the most up-to-date and accurate information. This would also align this to similar drafting in the licence e.g. in relation to billing provision.
- The word '*relevant*' should replace '*all*' to ensure that all suppliers are providing such information at a time that is of most use to customers, rather than just providing at '*all*' such points to ensure compliance with this requirement.
- We recommend that '*is effective*' is replaced with '*to*'. Otherwise it is not clear how a supplier will be able to comply to ensure that the tools and services provided are effective for all customers at all times.
- The words '*and how they may benefit financially from doing so*' are not required as Ofgem has proposed a separate principle for Consumption and cost choices. This requires a supplier to ensure customers are aware of all the key principle terms of tariffs to make an informed choice about their energy supply, including price, so focussing on only once aspect is not required.
- The term 'Energy Supplier' is not a defined term within Condition 1, and we recommend that Ofgem uses the pre-existing defined term 'Supplier', as this will meet the policy intent without creating an additional defined term unnecessarily.

Consumption and cost choices

2. The licensee must ensure that it ~~provides~~ *makes available* information, services, and/or tools for each Domestic Customer ~~throughout each year that,~~ taking into account that Domestic Customer's characteristics, preferences ~~and current Tariff,~~ is effective in:
 - a. ~~Enabling that Domestic Customer to understand the key features of their Tariff, including any Charges, and make timely choices in how and when they consume [electricity/gas].~~
 - b. ~~Encouraging that Domestic Customer to consider their options to improve their ability to manage costs and consumption, including ways to be more~~

efficient and flexible in how that Domestic Customer consumes [electricity/gas].

Key Engagement Points: *Points in time where a Domestic Customer is likely to want to consider, or could benefit from considering, their options relating to contracts and terms, including their choice of Tariff.*

- It is recommended that '*provides*' is changed to '*make available*' as through innovative technology such information may not be defined as being '*provided*' until the customer accesses this e.g. if they are able to make a live update to receive the most up-to-date and accurate information. This would also align this to similar drafting in the licence e.g. in relation to billing provision.
- The addition of the comma after '*services*' helps to clarify the intent in the grammatical drafting
- The requirement to provide consumption and cost information to each customer "*throughout the year*" contradicts the requirement to take account of each customer's characteristics and preferences. Some customers will not want to receive this information multiple times throughout the year, as implied by the proposed principle. Therefore, we recommend that Ofgem removes "*throughout the year*" from Principle 2. If Ofgem do not remove this then we recommend they define what is required by the term '*throughout the year*' so there is clarity for all suppliers.
- The words '*and current Tariff*' are not required as this would be a core characteristic of a domestic customer.

Assistance and advice information

3. *The licensee must ensure that it provides relevant information about their **energy services licensed activity** to each Domestic Customer at a frequency and in a form that enables that Domestic Customer to know how to **quickly and easily**:*
 - a. *Identify and contact the Relevant Party about a problem, question and/or other request for assistance. This includes, but is not limited to, general or specific queries, complaints, disputes and emergencies;*
 - b. *Seek impartial advice from independent parties such as Citizens Advice or Citizens Advice Scotland;*
 - c. *Identify their rights as regards to the means of dispute settlement, including how to access to any Relevant Ombudsman, in the event of a dispute with a Relevant Party; and*
 - d. *Access assistance. This includes, but is not limited to information about:*
 - i. *Managing debt **and finances**;*
 - ii. *Managing energy consumption and associated costs; and*
 - iii. *Energy efficiency, social **and financial programmes**.*

Relevant Party: *All relevant party/parties in relation to a Domestic Customer's energy supply. This includes, but is not limited to, the licensee, their Representatives or energy network companies.*

- The use of the term '*energy services*' as an undefined term and could cause confusion and be interpreted as being broader than the licensed activity of the

supplier in relation to the provision of energy. Therefore, we recommend this is amended.

- The words '*quickly and easily*' are not required. Timing and ease should be appropriate to ensure a domestic customer can make an informed choice about their energy supply.
- The use of the term '*finances*' and '*financial programmes*' could cause confusion and this could be interpreted as requiring a supplier to implement arrangements which are much broader than their current licensed activities. We recommend that this is deleted or that Ofgem clarify their intent by defining such terms.

Bills and billing information

4. *The licensee must ensure that they **provide make available** Bills, statements of account and/or any relevant billing information to each Domestic Customer. **This should be** at a frequency and in a form that takes into account that Domestic Customer's characteristics, preferences and their ability to effectively manage their costs and consumption, including information about:*
 - a. *Any Charges that are, or will be, owed to and/or by the Licensee*
 - b. *How any Charges since the last Bill or statement of account have been calculated, and*
 - c. *When and how that Domestic Customer needs to pay any Charges, leaving adequate time for that Domestic Customer to understand their circumstances and, where appropriate, arrange payment.*
- Requiring a supplier to "*provide Bills*" contradicts the current SLC 21B.5 licence requirement to "*make available a Bill or statement of account*" at least twice yearly. We consider modification of 21B.5 to be outside of the intended scope of this policy consultation, and propose modification of Principle 4 to replace "*provide*" with "*make available*".
- We have also suggested some minor amendments to the grammatical drafting.

Contract changes

5. *The licensee must ensure that it provides notification(s) to each Domestic Customer of any disadvantageous contract change, **price change** or any renewal of a fixed term contract. Taking into account that Domestic Customer's characteristics and/or preferences, the notification(s) must:*
 - a. *Be provided in adequate time and in a form that enables that Domestic Customer to make an informed choice and take action to allow them to avoid any changes before they take effect;*
 - b. *Describe what the change is, including an explanation of the **relevant** reason(s) for the change, any implications of the change if that customer takes no action and when the changes take effect; and*
 - c. *Communicate to the Domestic Customer their rights and options relevant to the change, including those set out in [conditions setting out retained prescription relating to the rights of the consumer].*
- The words '*price change*' should be deleted. Any price increase will already be required to be communicated as this would be a '*disadvantageous contract*'

change. However, suppliers may wish to make minor reductions to some pricing structures and in such instances it should be at a suppliers discretion as to whether sharing such information with domestic customers is required to ensure they are able to make informed choices about their energy supply.

- We recommend the addition of the word '*relevant*' or as currently drafted this could result in suppliers providing information which is not useful to customers.

Annex 2

Below we have provided track change recommendations for amendments to the communications rules changes tables Ofgem included as Annex 1 to the policy consultation.

SLC	Clause	Requirement	Proposal	Rationale
31E: Overarching requirements	31E.8	<p>Where the licensee or any Representative is required by any standard condition to provide information about all the Principal Terms, the licensee must take (and ensure that any Representative takes) all reasonable steps to communicate the following information to the Domestic Customer and ensure that the information is communicated (or, where the information is provided in Writing, drafted) in plain and intelligible language:</p> <p>(a) the Tariff Information Label or, in the case of oral communications, the information contained in the Tariff Information Label (in respect of any Domestic Supply Contract offered to the Domestic Customer); and</p> <p>(b) the Domestic Customer's Estimated Annual Costs (in respect of any Domestic Supply Contract offered to the Domestic Customer).</p> <p>Retain</p>	<p>Retain</p> <p>Remove</p>	<p>This is an important protection for consumers. It ensures that they get a projection of the costs they can expect to pay, and a summary of the key features of their tariff, before they become subject to the terms of that tariff (among other times).</p> <p>We question whether suppliers can truly vary the timing of communications, or apply the spirit of the proposed principles where prescriptive regulation contradicts the policy intent, to enable customers to receive the right information, at the right time, in the right form. Customers may not welcome receiving all of the required information within the Tariff Information Label, if it is not relevant to their interaction with the supplier. Where it is relevant, that information will be required by the new proposed principles in conjunction with existing Condition 0 Standards of Conduct and Condition 25 Informed Choices principles.</p> <p>We recommend that Ofgem removes 31E.8 to enable suppliers to better enact the policy intention of the supplier-customer communications reforms.</p>