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**Statutory consultation on the process for making changes to the Default Tariff Cap licence conditions**

EDF is the UK's largest producer of low carbon electricity. We operate low carbon nuclear power stations and are building the first of a new generation of nuclear plants. We also have a large and growing portfolio of renewable generation, including onshore and offshore wind, as well as coal and gas stations and energy storage. We have around five million electricity and gas customer accounts, including residential and business users. EDF is committed to building a smarter energy future that will support delivery of net zero carbon emissions, including through digital innovations and new customer offerings that encourage the transition to low carbon electric transport and heating.

EDF welcomes the opportunity to comment on Ofgem's proposals to modify Standard Licence Condition 28AD (SLC28AD) in the gas and electricity supply licences in respect of the process it will adopt in determining the updated Cap levels for forthcoming Cap periods.

Following a full and effective assessment and industry consultation process, Ofgem's final decisions should be capable of coming in to effect in a timely manner, so that the benefits of such modifications are not unduly delayed. It is noted that Ofgem's interpretation of the provisions of both the Default Tariff Cap and SLC28AD results in a requirement for a modification to SLC28AD to be in effect at the time Ofgem sets a Cap level for the forthcoming Cap period. The impact of this is such that the period between publishing a modification decision and the start of a cap period where such modifications first have effect is a minimum of around 110 days.

EDF is supportive of the proposed licence changes that seek to address the risks that could arise from such a large notification window. The implementation of these proposals should avoid both the need to constrain a consultation process in order to meet such timeframes, or delay such modifications having an effect on the setting of Cap levels. However, we believe the minimal window between final modification decision and announcement of a forthcoming Cap level should be used as a backstop only and that Ofgem should plan towards giving suppliers the maximum notification window, while not unduly delaying the implementation of its final decisions.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Steven Eyre or myself. I can confirm this letter is not confidential and may be published.

Yours sincerely



**Rebecca Beresford**  
**Head of Customers Policy and Regulation**