

Government Electricity Rebate (GER)

Annual Report 2014-2015

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Foreword

I am pleased to present our first annual report on the Government Electricity Rebate (GER) scheme. The report covers the period from 3 October 2014 (the date the scheme went live) until 31 March 2015. We highlight the main achievements from the last year and provide an overview of supplier compliance and audit. Lastly we take a look at some changes and scheme developments to be implemented in scheme year 2.

This report follows an extensive auditing and compliance assessment period that took place over the summer and autumn period of 2015. This included facilitating a response from all 25 suppliers to ensure audit recommendations were addressed, prior to us making final compliance determinations. This thorough process provides us with assurance that suppliers delivered their obligations.

Now at the end of the scheme's first year we have determined that suppliers have provided around 26.8 million rebates, representing over 99% of the eligible customer base. This is an excellent result for consumers as it means around £321 million has been returned to customers through the scheme.

I am delighted with the success of the first year of the scheme. We've used our knowledge and administrative expertise to design a simple, cost effective scheme and promote best practice amongst suppliers. We did this by providing clear scheme guidance, carrying out targeted audits, monitoring supplier compliance and supporting scheme participants. This included ensuring there was clear guidance for suppliers on providing a GER to Pre-Payment Meter (PPM) customers, who needed to take action to receive the rebate. Furthermore we worked with DECC and suppliers to ensure customers were encouraged to redeem those rebates.

The GER scheme had 25 compulsory participating suppliers in scheme year 1. Unlike other schemes the GER was designed to provide a rebate to all households with a domestic electricity account and the high volume nature of this brought its own challenges. I am pleased that smaller suppliers, who did not have prior experience of delivering such schemes, managed to meet their obligations in the vast majority of circumstances.

In making our compliance assessments, we introduced a new category of minor non-compliance. This was in response to instances where a supplier is considered mainly compliant, however evidence obtained highlights some limited non-compliances and/or operational weaknesses. For suppliers where we made this determination, we have made it clear that we expect improvements in scheme year 2.

One supplier was found to be non-compliant with specific elements of their obligation, although we found that they did meet their obligations in the majority of circumstances. They have accepted our findings and have committed to undertake retrospective action to rectify scheme year 1 shortcomings and report on this by 11 March 2016. They have also committed to make improvement for the next scheme year.

We look forward to working with the industry to ensure the GER continues to be a success in scheme year 2 and to taking learnings from scheme year 1 forward into our administration of other schemes.

Chris Poulton
Managing Director, E-serve

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Associated Documents and Links

[Ofgem Guidance for Suppliers \(scheme year 1\)](#)

[DECC's Guidance for Suppliers](#)

[Electricity Supply Standard Licence Conditions](#)

[Ofgem's GER webpage](#)

[Secretary of State Direction](#)

Glossary of Terms

Key scheme definitions

To assist in interpreting scheme data the following definitions should be observed. These definitions correspond with those contained in Ofgem's *Guidance for Licensed Electricity Suppliers* document (version 1.1):

Cut-off date	The last date on which a domestic supplier may deliver a GER to an " <i>eligible customer</i> " for which the domestic supplier may make a request for reimbursement in relation to each scheme year. For scheme year 1 this was 28 February 2015.
Delivering a rebate	When the customer has received the financial benefit of the rebate (e.g. when an account balance is credited, vouchers/SAM redeemed or cheque cashed).
Eligible customer	A Domestic Customer of a domestic supplier with a Domestic Supply Contract or a Deemed Contract at 00:01 hours on a qualifying date.
Exception	An " <i>eligible customer</i> " to whom a supplier did not provide a rebate.
Late provided rebate	A rebate provided to an eligible customer for Scheme Year 1 after the " <i>cut-off date</i> ".
Outstanding customer	An " <i>eligible customer</i> " to whom a supplier did not provide a rebate by the end of the " <i>payment period</i> ". Suppliers had until the " <i>cut-off date</i> " to attempt to provide these customers with a rebate.
Payment period	The dates during which the rebate should be provided to domestic electricity customers identified on the " <i>Qualifying Date</i> ". This is a six-week period starting from the " <i>Qualifying Date</i> ".
Providing a rebate	A supplier tenders payment of the rebate to an " <i>eligible customer</i> " (e.g. credit sent to an account or vouchers/Special Action Messages (SAM) sent to prepayment meter (PPM) customer).
Qualifying date	The date on which a supplier must identify all of its domestic electricity customers who are eligible to receive the GER (" <i>eligible customers</i> "). For SY1 this was 12 October 2014.
Unredeemed rebate	When an " <i>eligible customer</i> " is provided a rebate but does not redeem the rebate provided (e.g. uncashed voucher/cheque or SAM not redeemed).

Executive Summary

The Government Electricity Rebate (GER) scheme has its origins in the government Autumn Statement of 2013, where government committed to reducing the cost of social and environmental programmes on customer bills. This included the payment of a £12 rebate to domestic customers for two years (2014/15 and 2015/16). The GER scheme was developed and is administered by both Ofgem and DECC.

The GER scheme requires participating energy suppliers to provide a rebate to domestic electricity customers registered to them on a qualifying date. The rebate is normally deducted from a customer's bill or provided in the form of a credit through voucher or credit to a meter for pre-payment customers.

This is a report on the first year of the scheme and summarises the outcomes achieved as well as suppliers' compliance with it. **This report covers the first year of the scheme – 3 October 2014 to 31 March 2015.**

In the year, obligated suppliers provided around £321m worth of rebates to consumers, representing 99.16% of the eligible customer base, or c.26.8 million rebates. Suppliers were unable to provide a rebate to around 225,000 eligible customers, representing 0.83% of total eligible customers. Around 1.2 million rebates were not redeemed by customers totalling around £14.5 million in value.

We found that 24 of 25 participating suppliers complied overall with obligations, or had minor non-compliances. For suppliers, where minor issues were noted, we are confident that this affected a limited number of customers. One supplier, npower, failed to attempt to provide a rebate to some identified eligible customers and was judged not to have fully complied with its obligations. We are currently working with npower, requiring them to rectify this situation.

The scheme is in the second of its scheduled two years, with this report being the first produced. We intend to follow this up with a scheme year 2 report once all required actions are complete.

1. Regulatory Context

Chapter overview

This chapter describes the background and regulatory context to the GER scheme. It provides a summary of the regulatory framework which underpins the scheme, summarises participating suppliers' obligations and explains the purpose and structure of this report.

The Government Electricity Rebate (GER) scheme

- 1.1. In the 2013 Autumn Statement, government indicated that a £12 annual "Government Energy Discount" (now called the Government Electricity Rebate, or GER) would be paid to domestic electricity customers for each of the next two years. The payments are intended to reduce the impact of social and environmental programmes on domestic energy bills. One rebate was to be provided during the autumn of 2014 and the other during the autumn of 2015.
- 1.2. In general terms, suppliers are required to provide rebates to all domestic electricity customers they hold on the qualifying date and will be reimbursed by government to the value of rebates delivered. This reimbursement function is administered by Department of Energy and Climate Change (DECC).
- 1.3. The GER applied to all holders of electricity supply licences regardless of the number of domestic electricity customers they had. Unlike other schemes (e.g. Energy Companies Obligation or Warm Home Discount) there was no customer number threshold applied. This ensured the GER covered all domestic electricity customers, being available to around 27 million households.
- 1.4. In Scheme Year 1 there were 25 obligated suppliers with domestic electricity customers on the qualifying date.
- 1.5. We operated a compliance assessment and auditing framework to test supplier compliance with GER obligations and worked with DECC who separately ensured the funds from government for this rebates were controlled.
- 1.6. This document is an annual report on delivery in Scheme Year 1 (3 October 2014 - 31 March 2015).

The scheme administrators

- 1.7. DECC is responsible for GER policy and Secretary of State Direction. Through sections 7(3)(a) and 107 of the Electricity Act (1989), the Secretary of State for Energy & Climate Change introduced a Direction, requiring suppliers to implement the Government Electricity Rebate.

- 1.8. Following consultation, we introduced electricity supply standard licence condition modification 25D on 3 October 2014. This required licence holders to comply with this SoS Direction (provided by DECC) to implement the GER. Electricity supply licence holders were required to comply with the SLC 25D and the SoS Direction. Both Ofgem and DECC published guidance to assist suppliers interpret the licence condition and Direction in order that they understand and deliver their obligations.

Summary of Scheme Year 1 (SY1) Supplier Obligations

- 1.9. Suppliers were responsible for providing the rebate to all eligible customers they had registered at 00:01 on the scheme year 1 (SY1) qualifying date (12 October 2014) regardless of billing or payment method (e.g. direct debit, credit or prepayment). Suppliers were required to take all reasonable steps to provide a rebate during a specified period (the payment period). This is a six-week period immediately following the qualifying date. If they are not able to do so they had until the following 28 February to provide any outstanding GER rebates.
- 1.10. Suppliers were required to report to us by 28 April 2015 including on the number of eligible customers and the number of rebates provided by the SY1 cut-off date (28 February 2015).
- 1.11. Suppliers were required to clearly label the GER on the first electricity bill or statement of account following the payment date, or otherwise notify customers in writing that they had been provided with the GER.
- 1.12. Suppliers were required to establish transparent procedures and reporting to demonstrate the number and value of rebates delivered and that the amount of government funding received was exactly equivalent to the value of the rebates delivered.
- 1.13. As part of our monitoring functions, we supported suppliers in delivering the GER through engaging with participants, facilitating discussions between all stakeholders and sharing best practice in delivery through our monitoring of scheme progress. As the rebate was delivered by all suppliers with domestic customers this meant that most of the obligated suppliers in SY1, had no experience of delivering such obligations¹, thus a key objective was to help upskill those suppliers in order that they were able to deliver their obligations.

Purpose of this Report

- 1.14. As an output of our monitoring of Scheme Year 1 achievement, we prepared this annual report detailing suppliers' performance against their obligations, with an overall review of the outcomes achieved by the scheme as a whole.
- 1.15. This report is prepared to inform the Secretary of State of supplier performance against obligations and to inform future policy development by DECC. The report also informs participating suppliers and interested stakeholders of the scheme's overall progress and the outcomes achieved.
- 1.16. We prepared this report based on information submitted by suppliers in their end of year compliance reports for scheme year 1. We have reviewed these along with supporting evidence, and asked suppliers' internal auditors, as well as external auditors contracted by us, to verify the reports were accurate.

¹ the majority of environmental and social programmes which place obligations on suppliers have thresholds which exempt the smallest energy companies.

2. Achievements in Scheme Year 1

Chapter overview

This chapter outlines the key achievements from scheme year 1 focusing on the provision of rebates by suppliers, relative to the entire eligible customer base. Included is the total financial support provided and definitions to help interpret data.

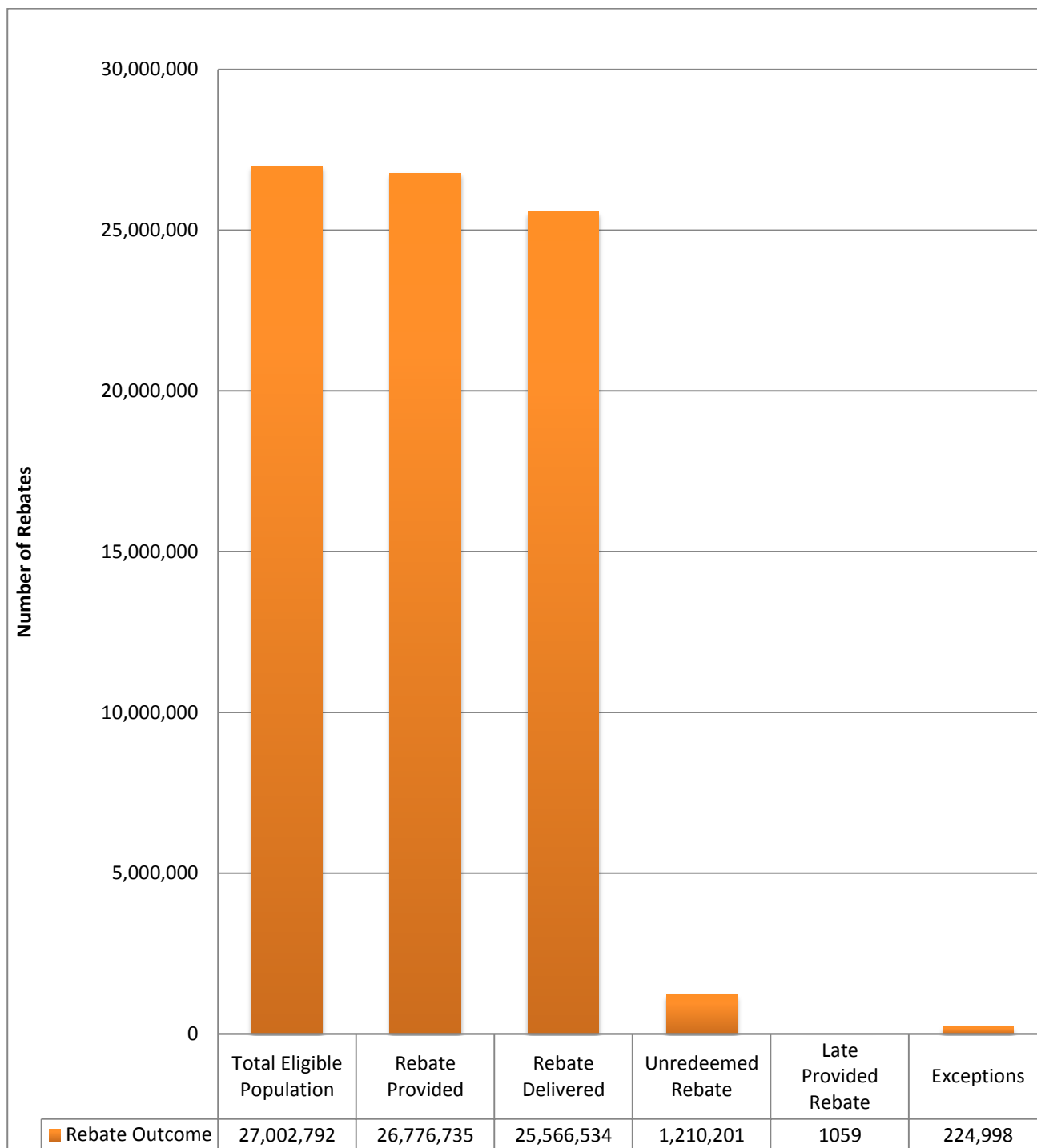
2.1. In scheme year 1 the following was achieved across all 25 participating suppliers:

	Number	Percentage of eligible customers	Financial Value
Total eligible customers	27,002,792	100%	£324,033,504
Rebates provided	26,776,735	99.16%	£321,320,820
Rebates delivered	25,566,534	94.68%	£306,798,408
Unredeemed rebate	1,210,201	4.48%	£14,522,412
Late provided rebates (after 28 Feb 15)	1059	0.004%	£12,708
Exceptions	224,998	0.83%	£2,699,976

Note rebates "Delivered" are a sub-set of rebates "Provided".

- 2.2. The above data was verified through external audit by Ofgem-appointed auditors, after supplier end of year returns were submitted.
- 2.3. It is evidenced that over 99% of eligible customers were provided a rebate, representing c. £321m worth of financial support being provided directly to customers. We consider this to be a key positive outcome.
- 2.4. Suppliers reported that c.1.2m customers did not redeem their rebate. This primarily relates to circumstances where a supplier provided a rebate to a PPM customer but the customer not taking the opportunity to redeem this (e.g. voucher or Special Action Message). In this regard the c. £14.5m worth of rebates not redeemed is disappointing, but largely down to customer behaviour not within supplier control. Delivery of rebates to direct debit or credit customers was easier to achieve as the rebate was applied directly to the balance of the bill, thus there was no need for these customers to redeem the rebate.
- 2.5. Exception numbers were <1% of total population, which was considered by us to be within acceptable levels. There are further details on exceptions in chapter 3.

2.6. Figure 1 – Eligible Customer Rebate Outcome



Note rebates "Delivered" are a sub-set of rebates "Provided".

2.7. Figure 1 above provides visualisation of the success of GER as a rebate delivery mechanism. It is demonstrated that the vast majority of rebates are both provided and delivered.

- 2.8. From the above we have evidence that the GER scheme has shown itself to be an effective mechanism to provide rebates to a large volume of customers and that the policy intent has been met in the vast majority of cases.
- 2.9. Figure 1 also demonstrates that suppliers have been very effective in ensuring that rebates have been provided to eligible customers.
- 2.10. From evidence gathered through end of year returns and verified through external audit, it was found that all 25 obligated suppliers provided a GER to between 97.9 - 100% of their eligible customer base. As such there is no evidence that supplier size affected rebate provision performance. This demonstrates that suppliers of all sizes have shown themselves to be effective at providing a GER to their customers. This included effective performance by smaller suppliers who did not have prior experience of delivering such schemes.
- 2.11. To support suppliers in understanding and delivering their obligations we engaged with them through a series of one to one meetings where we discussed progress updates and delivery and compliance issues in order to facilitate resolution. Suppliers engaged with us effectively during these meetings and demonstrated willingness to take on board our comments and concerns. The result of this was enhanced supplier practice helping to facilitate a high level of rebate provision, which was recognised during compliance assessment.

3. Supplier Compliance in Scheme Year 1

Chapter overview

This chapter outlines Ofgem’s compliance assessment activity for SY1 including summary of the steps involved. It also outlines the compliance determination made for each of the 25 participating suppliers. Further detail is provided on the one supplier who was found non-compliant with obligations, the reasoning for this and further action taken.

- 3.1. Paragraph 10 of the Direction requires suppliers to submit an end of year return to us for every electricity supply licence which they are attributing eligible customers to.
- 3.2. The end of year return comprises statistical reporting and supporting narrative for each electricity supply licence that eligible customers were attributed to. In addition suppliers were required to submit an Internal Audit (IA) report.
- 3.3. On the basis of these returns and supplementary evidence (notably the external audit report), Ofgem undertook compliance assessment of supplier activity to ensure suppliers complied with GER obligations. Ofgem undertook no assessment on the supplier reimbursement function. This was administered and assessed by DECC.
- 3.4. Ofgem stratified different levels of compliance/non-compliance to take account of the materiality and impact of non-compliances identified. The 4 levels of determination were:

Determination Level	Summary Definition
Compliant	Supplier is considered compliant based on end of year report and satisfactory audit assurances obtained.
Compliant with minor contraventions	Supplier is considered mainly compliant. Some minor contraventions were reported however these were not considered significant and the supplier appears to have implemented a suitable response.
Minor non-compliant	Supplier is considered mainly compliant, however evidence obtained highlights some limited non-compliances and/or operational weaknesses.
Non-compliant	Supplier is considered non-compliant based on end of year report and/or lack of audit assurance. Information obtained highlights significant non-compliances and/or significant operational weaknesses.

3.5. Our final determination for all 25 obligated suppliers in SY1 is summarised in Figure 2 below:

Figure 2 – Supplier Compliance Determination

Supplier	Compliance Assessment Level
Axis Telecom	Compliant with minor contraventions
British Gas	Minor non-compliant
Co-operative Energy	Compliant with minor contraventions
E Gas and Electricity	Compliant with minor contraventions
Economy Energy	Compliant with minor contraventions
Ecotricity	Minor non-compliant
EDF Energy	Compliant with minor contraventions
E.ON	Compliant with minor contraventions
Extra Energy	Minor non-compliant
First Utility	Minor non-compliant
Flow Energy	Minor non-compliant
GnERGY Energy	Minor non-compliant
Good Energy	Compliant
Green Energy	Compliant
Green Star Energy	Minor non-compliant
i-Supply Energy	Compliant
LoCo2 Energy	Compliant with minor contraventions
nPower	Non-compliant
OVO	Minor non-compliant
ScottishPower	Minor non-compliant
Spark Energy	Minor non-compliant
SSE	Minor non-compliant
Symbio	Compliant with minor contraventions
Utilita	Minor non-compliant
Utility Warehouse	Compliant

- 3.6. In making the above determinations we distinguished between scheme "compliance" and scheme "performance". In this way a supplier may be able to evidence a high degree of rebate provision (scheme performance), but nonetheless may also demonstrate a number of non-compliances with the Direction and Guidance (scheme compliance), which was taken into account when making the compliance determination.
- 3.7. Compliant suppliers (with or without minor contraventions) had few (or no) non-compliances with the Direction or Guidance and no further response was required. Little or no customer harm arose from these contraventions.
- 3.8. For suppliers found "minor non-compliant" we determined that no further action was required, on the basis that they had provided a suitable response to findings outlined in the external audit report. Furthermore these suppliers had already submitted satisfactory proposals for SY2, taking account of shortcomings identified in SY1. All "minor non-compliant" suppliers provided a rebate successfully to the vast majority of their eligible customers. Suppliers falling into this category typically demonstrated shortcomings in reporting and often did not demonstrate robust approaches to the management of exceptions.
- 3.9. We were disappointed with the standard of some suppliers reporting. Some required resubmission of returns and following external audit there were often discrepancies identified between supplier's records on-site and what was reported in end of year returns to us. These discrepancies were small relative to the entire customer base.
- 3.10. Although the percentage of exceptions was low (0.83%) we expected all suppliers to be able to evidence an active attempt to contact households to determine eligibility and provide a GER, where possible. Had all suppliers done so, we can assume that the number of exceptions outlined would have been lower and more households would have received the rebate than actually did. We were not concerned with the number of exceptions reported, but we expect improvements during SY2 from a number of suppliers in terms of how they are handled.
- 3.11. One supplier, npower, was found to be non-compliant with some of their obligations. The most serious non-compliance evidenced was that npower identified a substantial number of eligible customers following the scheme year 1 qualifying date (12 October 2014) but failed to attempt to provide these customers with a rebate during the scheme year. Also npower could not evidence that they made reasonable attempts to contact the vast majority of their outstanding customers to provide a GER by the scheme year 1 cut-off date. In addition npower also had substantial reporting errors. A considerable number of discrepancies were identified at audit between supplier records on-site and end of year reporting to us.

- 3.12. In making this determination we recognised the difference between supplier performance and supplier compliance. npower evidenced that they provided a GER to over 99% of their customer base. However it was our assessment that the failure to address the retrospective identification of a substantial number of eligible customers, as well as the impact of other minor non-compliances and contraventions, meant that a determination of “non-compliant” was appropriate.
- 3.13. Following the determination of “non-compliant” we are now requiring npower to complete SY1 retrospective work to ensure SY1 eligible customers are credited with a GER, where possible. npower have accepted that a substantial number of customers were not processed in line with the Direction and Guidance and have advised they have undertaken retrospective work, including providing rebates to eligible customers previously omitted. npower will be required to report to us in March 2016 to evidence completion of this retrospective work.
- 3.14. Following assessment of this retrospective SY1 work, we will consider whether further action is required.

4. Audit Programme

Chapter overview

This chapter outlines the purpose of the audit programme in contributing towards supplier compliance assessment, including summary of the assurances being sought. Furthermore summary of the overall outcome is outlined.

- 4.1. As noted above, as part of monitoring functions, we must make sure that suppliers comply with their obligations under the Direction and our guidance. One way that we do this is through an annual audit programme which provides assurance that information is reported accurately, and which helps the supplier follow best practice in delivery of obligations by recommending process improvements.
- 4.2. As outlined previously Ofgem and DECC have separate functions in relation to the administration of the functions under the Direction. To promote efficiency of the audit programme in terms of resources and costs, both organisations shared the same external audit programme, though received separate audit reports tailored to the requirements of each organisation. Similarly to compliance assessment, we did not review the supplier reimbursement aspect of the audit as this was administered by DECC. Both Ofgem and DECC made independent decisions based on the audit results.
- 4.3. As part of year end reporting, all 25 participating suppliers also submitted an internal audit report to confirm that their internal teams had completed the required audit testing, along with an outline of the results and findings.
- 4.4. Our appointed auditors carried out a total of 25 supplier audits across June and July 2015, being one external audit per participating supplier. For us the focus of these audits was to gain external assurance that:
 - Eligible customers had been correctly identified
 - Suppliers provided rebates to their eligible customers as required
 - Supplier end of year reporting was accurate

Our auditors:

- Examined source information to ensure data reported reconciled with supplier records
- Examined records for a sample of rebates provided to test compliance
- Examined records for a sample of reported exceptions to test compliance
- Undertook an overview of supplier governance arrangements

4.5. The breakdown of results of these audits is as follows:

Figure 3 – External Audit Rating Outcomes:

	Good / Satisfactory	Weak	Unsatisfactory
External Audit ratings (number of suppliers in each category)	15	8	2

- 4.6. We agreed a scoring mechanism and tolerances with our external auditor, which were used to determine the audit rating. Following receipt of all draft reports, findings and ratings were assessed for consistency to ensure equal applicability across all suppliers.
- 4.7. Audits reports were shared with suppliers, who had opportunity to comment on the report and provide a written management response to findings. This allowed all parties to agree the report was accurate and to agree actions to address the findings.
- 4.8. Whilst 10 audits had a “Weak” or “Unsatisfactory” rating, these were often due to non-compliance with aspects of the Direction and Guidance that had little impact upon overall rebate provision.
- 4.9. For all external audit reports, we received written responses from suppliers to address points of concern and recommendations. In most cases suppliers accepted the findings. Where suppliers challenged findings, or ratings, they were given opportunity to have their representations considered prior to any final rating determination being made.
- 4.10. Audit reports, including the supplier management response, were taken into account as part of supplier compliance assessment to help determine the compliance levels outlined in Figure 2 in section 3.
- 4.11. We will continue to work with suppliers in scheme year 2, to ensure that their internal audit reports meet the requirements for audit assurance of the GER scheme, and that they continue to strive for best practice in delivering their obligations.
- 4.12. We will also work in conjunction with DECC and our external auditors to agree an audit strategy for SY2 that meets the requirements of both organisations, providing effective independent assurance on supplier delivery of GER obligations.

5. Looking Forward: Scheme Year 2

Chapter overview

This chapter gives consideration to developments in Scheme Year 2, building on Scheme Year 1. It outlines the new suppliers participating in Scheme Year 2 and summarises key changes from SY1 to improve SY2 delivery of obligations.

- 5.1. The scheme successfully provided a rebate to the vast majority of eligible customers in SY1, and we anticipate similar success in SY2. We recognise that there is limited scope for suppliers to improve upon rebate provision but expect that improvements will focus on reducing exceptions and increasing the uptake by customers.
- 5.2. The scheme provided financial support of around £321m to customers in SY1 and we hope that a similar level of support will be provided in SY2, totalling around £640m across the two scheme years.
- 5.3. As originally intended scheme year 2 (SY2) will be the final year of the scheme.
- 5.4. We intend to produce a similar report on SY2 compliance following completion of our compliance assessment.

Participating suppliers

- 5.5. In SY1 there were 25 obligated suppliers (listed in Appendix 1) with their eligible customer numbers ranging from 22 to c.6.5 million.
- 5.6. For SY2 there are seven new suppliers in addition to the 25 who participated in SY1, thus 32 in total. The seven new suppliers are; Bulb, Effortless Energy, Future Energy, GB Energy, Places for People, Robin Hood Energy and Tempus Energy.
- 5.7. When a new supplier joins the scheme, they are required to set up new processes to provide a GER to customers. We are aware that this can involve significant effort for the suppliers who do not have prior experience of participating in similar government schemes. One of our priorities as scheme administrator is to engage with each new supplier and assist them understand and effectively deliver their obligations. This is facilitated through ongoing engagement by way of; reviewing supplier proposals, open communication channels and supplier 1:1 meetings.
- 5.8. Many suppliers in SY1 had limited experience of engagement with us on such schemes and we were pleased to note that all were able to meet the vast majority of their obligations. As such we are hopeful that all new suppliers in SY2 will show similar success.

Key Developments for Scheme Year 2

- 5.9. We published amended guidance for suppliers on 27 July 2015 to facilitate suppliers continued understanding of obligations, and to provide additional guidance on learning points from SY1. Suppliers were given the opportunity to input into the development of this guidance.
- 5.10. In particular, we developed guidance on the handling of different categories of exceptions. Although exceptions only constituted 0.83% of the SY1 population, we felt that some suppliers could have made more robust efforts to contact households to establish eligibility and provide a GER.
- 5.11. We therefore developed guidance to give clear parameters of our expectations on suppliers in administering exceptions. This includes evidencing an active attempt to contact customers (e.g. through letter to a property or email to a customer) to facilitate rebate provision. It is intended that this additional guidance will lead to greater supplier adherence to obligations. It is subsequently hoped this will result in even greater rebate provision in SY2, as well as reduced non-compliances.
- 5.12. Due to the degree of misreporting errors encountered in SY1 and additional work arising from this, we took the view that for SY2 suppliers will only be allowed one re-submission of their end of year return. As such we expect suppliers to have robust data collection, calculation & retention procedures, and have sufficient oversight to ensure accuracy prior to submission. On occasion supplier misreporting was down to misinterpretation of the guidance, however given most suppliers have experience of SY1, we believe the likelihood of this is now reduced. Our expectation is for greater accuracy in reporting following SY2. Similar to SY1 our intention will be to test this through external audit to provide independent assurance that obligations are being delivered.

Appendix 1: Participating suppliers

GER compulsory scheme year 1 electricity suppliers

Supplier Group	Licence Names
Axis Telecom	Axis Telecom Limited
British Gas	British Gas Trading Ltd
Co-operative Energy	Co-Operative Energy Limited
E Gas and Electricity	E (Gas and Electricity) Ltd
Economy Energy	Economy Energy Trading Ltd
Ecotricity	The Renewable Energy Company Limited
EDF Energy	EDF Energy Customers Plc
E.ON	E.ON Energy Solutions Limited
Extra Energy	Extra Energy Supply Limited
First Utility	First Utility Limited
Flow Energy	Flow Energy Limited
GnERGY Energy	GnERGY Limited
Good Energy	Good Energy Ltd
Green Energy	Green Energy (UK) plc
Green Star Energy	Hudson Energy Supply UK Limited
iSupply Energy	iSupply Energy Ltd
LoCo2 Energy	LoCo2 Energy Supply Limited
npower	Npower Limited, Npower Northern Supply Limited, & Npower Yorkshire Supply Limited
OVO	Ovo Electricity Limited
ScottishPower	Scottish Power Energy Retail Limited
Spark Energy	Spark Energy Supply Limited
SSE	SSE Energy Supply Ltd
Symbio	Symbio Energy Solutions LLP
Utilita	Utilita Energy Limited
Utility Warehouse	Electricity Plus Supply Limited (Utility Warehouse)