

Ofgem
9 Millbank
London
SW1P 3GE

Email to: colin.down@ofgem.gov.uk

15 February 2017

Dear Colin,

Consultation: Proposed direction pursuant to condition 44.3 of the electricity supply licence/condition 38.3 of the gas supply licence in relation to large suppliers' roll-out plans

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, 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 support the proposed amendments to the framework for regulating large energy suppliers with respect to their smart meter plans, and the setting of annual milestones. We consider that the draft legal direction delivers on the policy intent described in the consultation letter.

In consideration of the continued uncertainty in programme critical deliverables such as; a fully functioning and stable DCC, the delivery of the 868 solution and the timelines for Alt HAN, it is sensible that suppliers provide updated plans showing how they plan to meet the licence condition to take all reasonable steps to complete the smart meter roll-out.

Given the on-going programme uncertainty Ofgem should be considering allowing suppliers to re-submit updated rollout plans in January 2019. This will allow the most up to date information and assumptions being communicated taking into account changes to the industry programme.

If you have any questions relating to our response, please contact Ash Pocock on 07875 112854, or myself.

Yours sincerely,



Paul Delamare
Head of Customers Policy and Regulation