Dear Lewis,

Thank you for the opportunity to respond to the proposals to amend the Typical Domestic Consumption Values (TDCV).

The suggested changes are comparable to our own analysis of customers changing usage patterns, and therefore we believe that the revised values, albeit marginally different from the current ones, are an accurate set of estimates to use. However, the TDCV is used by energy suppliers in a number of different business processes when servicing our customers; the cost of amending the values is considerable and takes time to deliver in a robust way. Making very small amendments to the TDCV, as proposed, does not seem cost effective and to be in the best interest of the market and consumers.

We do not have any significant issues with the values proposed. Given that averages are often misleading, customers should, where possible, be encouraged to use their own consumption.

Thank you.



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