

Dennis Berg
Senior Policy Manager- Consumer Policy
Ofgem
10 S Colonnade
Canary Wharf
London, E14 4PU

Submitted via email to: CDconsultations@ofgem.gov.uk

2 October 2020

Dear Dennis

Statutory Consultation: Extending protections for non-E7 restricted meter customers (SLC 22G)

Thank you for the opportunity to respond to the Statutory Consultation on extending protections for non-E7 restricted meter customers (SLC 22G).

Energy UK supports Ofgem's proposals to extend the protections for non-E7 restricted meter customers in SLC 22G to 30 June 2025 as set out in the consultation. We also broadly support the further proposal to give Ofgem the power to extend the protections past the proposed 30 June 2025 deadline by publishing a statement to that effect in writing.

We note, however, that if Ofgem does decide to exercise these powers and extend the deadline in the future, it would be good practice to include a clear justification as to why the deadline has been further extended in conjunction with the written statement, just as Ofgem has done through this Statutory Consultation. We suggest that Ofgem revisits the proposed current drafting and specifies this commitment within the licence condition drafting itself. This could be done by simply adding the words '*following consultation*' into three of the licence conditions, which would be consistent with the approach Ofgem has taken in a number of existing licence conditions. Please see the table below which provides an example of how the drafting could be reworded.

Further to the points raised above, we note that Consultation refers to limited consumer understanding of the regulations. We would like to ask if there are any specific further actions Ofgem feels suppliers should be taking to ensure customers on non-E7 restricted meters are being treated fairly.

I trust you find this response useful and please do not hesitate to get in contact should you wish to further discuss the matters outlined in this letter.

Yours sincerely,

Iona Penman
Policy Executive, Energy UK
Telephone: 02077472932
Email: iona.penman@energy-uk.org.uk

Annex 1

Suggested table of amendments to the proposed changes to SLC 22G

Reference	Suggested amendment
SLC 22G.7	The Relevant Licensee must comply with paragraphs 22G.1 and 22G.2 from 1 September 2017 until 30 June 2025, unless, following consultation, the Authority specifies a later date by publishing a statement in Writing.
SLC 22G.12	The Relevant Licensee must comply with paragraph 22G.9 from 1 September 2017 until 30 June 2025, unless, following consultation, the Authority specifies a later date by publishing a statement in Writing.
SLC 22G.13	The licensee must comply with paragraphs 22G.10 and 22G.11 from 15 December 2016 until 30 June 2025, unless, following consultation, the Authority specifies a later date by publishing a statement in Writing.