

Anna Rossington
Deputy Director, Retail Directorate
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

2 October 2020

Dear Anna,

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

Thank you for the opportunity to respond to Ofgem's statutory consultation on proposals to extend the protections for non-Economy 7 (E7) restricted meter customers set out in SLC 22G from 31 December 2020 to 30 June 2025.

We recognise that the required smart meter variants for these customers are not yet widely available, and that if the protections under SLC 22G were to lapse at the end of the year these customers could lose their ability to switch to a single rate tariff without having their meter replaced, and therefore their potential access to savings may be constrained. We are therefore supportive of Ofgem's proposal to amend the sunset clause in SLC 22G from 31 December 2020 to 30 June 2025, in line with the smart meter rollout post 2020 framework.

We note that Ofgem intends to include a provision to allow it to extend the protections further if necessary. We are supportive of this proposal provided that suppliers are afforded the opportunity to fully assess the impact of and comment on any such extensions through formal consultation. We have set out suggested amendments to Ofgem's draft licence condition revisions in Annex 1 of this letter, and would note that this wording is aligned to that of the sunset clause (SLC 32A.9) for SLC32A (Power to direct suppliers to test consumer engagement measures).

We would also suggest that Ofgem considers amending the wording such that the sunset date can also be brought *forward*, should the need for these protections fall away before 30 June 2025.

If you have any comments or queries on any aspect of this response, please do not hesitate to contact Emma Howe (ehowe@scottishpower.com) or myself.

Yours sincerely,



Richard Sweet
Head of Regulatory Policy

**SCOTTISHPOWER COMMENTS ON TABLE 1 OF THE CONSULTATION DOCUMENT
SETTING OUT AMENDMENTS TO SLC 22G**

Reference	Suggested amendment	Rationale
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.	As noted in our letter, we request that Ofgem amends the licence conditions in line with that of the sunset clause in SLC 32A.9 to ensure that suppliers are afforded the opportunity to comment on any further amendments to SLC 22G through formal consultation.
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.	