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RetailPriceRegulation@ofgem.gov.uk

Dear Ofgem team

Reflecting Potential Changes to BSUOS in the Price Cap

Sustainability First is a charity and think-tank focussed on social and environmental issues in energy and water. We have been closely involved in various regulatory debates, including around network charging and the RIIO price controls.

We have not got the resources to look in detail at the proposed changes in Ofgem's consultation. However, we are very struck that nowhere in the consultation is there any discussion of the impacts of the proposed changes on Profile Class 2 (multi-rate) customers. From the spreadsheet model it appears that again this change could have a bigger impact on these customers than it does on customers on a standard rate tariff.

In the response that we will be submitting shortly to the consultation on Ofgem's Programme of Work on the price cap we will be raising concerns about how Economy 7 customers have been failed by the price cap, based on a report prepared by Grid Edge Policy for Glen Dimplex. One of the specific asks in that report is that Ofgem explicitly considers how any changes that it is making to the price cap will impact these customers. At around 10% of households – predominantly in rented accommodation or on low or very low incomes - this is not a niche that can simply be ignored.

Yours faithfully

Maxine Frerk

Associate Sustainability First