

Consultation question 1: Of the three options identified in relation to extending liquidity support, which option do you support and why? Please explain your answer and provide supporting evidence wherever appropriate. Which option is most compatible with furthering customers interests and why?

We did not use the deferral provision but support its use and recognise its value in supporting the market. Had we used this provision we would have best supported Option 2 to extend the time period but not the total deferral amount.

Consultation question 2: If we were to implement option 2, should we retain the existing capped amount of liquidity support (i.e. 40% of primary charges from March to July), or should this be reduced to a lower level (e.g. 30, or 25%)? Please explain your answer and provide supporting evidence wherever appropriate.

NCC did not use the deferral provision but had we done so, we would have supported option 2 and feel that the existing cap of 40% of the primary charges from March to July best supports the industry's recovery.

Consultation question 3: If we were to implement option 2, should we continue to allow Retailers to opt into the scheme at any time up until October 2020? We also welcome stakeholder views on the most appropriate way a cap could be implemented into the current mechanism. Please explain your answer and provide supporting evidence wherever appropriate.

We do not expect to opt into the scheme as a self-supply entity but support the option for retailers to continue to opt into the scheme up to October but not reasonably extending beyond

Consultation question 4: Of the three options identified in relation to unwinding liquidity support, which option do you support and why? Please explain your answer and provide supporting evidence wherever appropriate. Which option is most compatible with furthering customers' interests and why?

NCC has not used the support but had we done so the unwinding of such support would be better served by option 2. Option 3 leaves itself too open to inconsistencies across the market and additional time and resource in meeting agreement.

Consultation question 5 : Under option 3 do you agree that 33% of deferred wholesale charges should be repaid by end November 2020 and that 66% should be repaid by end January 2021? Please explain your answer and provide supporting evidence wherever appropriate.

As per previous statement we would not endorse option 3

Consultation question 6: Do you agree that the option for Retailers to use the temporary vacancy flag should be allowed to expire on 31 July 2020? Please explain your answer and provide supporting evidence wherever appropriate.

Agree to the expiration of the first flag provision at this date. However, it is now clear that many businesses have significant further work to undertake in order to comply with social distancing and for some this remains infeasible. These premises will remain vacant directly as a consequence of COVID-19 so direction on a second provision should be made to cover those still genuinely vacant premises.

Consultation question 7: Do you agree that in the event of (1): reduced consumption, and/or (2) any local lockdowns, Retailers should seek to obtain meter reads to reflect actual consumption in

the market (or in the event a meter read cannot be obtained engage with customers to obtain an accurate estimate of consumption (YVE))? Please explain your answer and provide supporting evidence wherever appropriate. If you do not agree, please set out an alternative proposal. Covid-19 and the business retail market – Consultation on next steps 43

Retailers should make all reasonable efforts attempt to gain a meter readings where possible however it needs to be reflective of the situation and local circumstances. External reads should be the priority with internal reads limited for safety.

Customer engagement should be pursued but it should be recognised that those businesses who have not resumed trading or those only just initiating resumption of trading are unlikely to be well placed for meaningful exchange.

Consultation question 8: Do you agree that following the expiration of the temporary vacancy flag Retailers will have until the end of September to remove these flags from CMOS? Please explain your answer and provide supporting evidence wherever appropriate.

Support a transition period to permit Retailers to remove the flags provided timely direction is given as to a second stage of vacancy for those premises still not able to resume operations.

Consultation question 9: Do you agree that a new MPS should be introduced from 1 October that focusses on the timely removal of all temporary vacancy flags? If so, what are your views about how this standard should be designed? Please explain your answer and provide supporting evidence wherever appropriate.

Correct occupancy status is key as is all accurate data and introduction of an MPS may help drive this and discourage misuse. All temporary vacancy should be reviewed and updated to reflect current occupancy, which realistically will still contain a proportion of business and premises which remain temporarily vacant. Retailers should be considered where they have not reviewed or updated occupancy status but should not be penalised for those premises unable to resume operations by 1st October and where temporary vacancy is accurate.

Consultation question 10 : Do you agree that an additional MPS (or alternatively an API) should be introduced to monitor the use of YVEs in the market and incentivise the submission of more accurate consumption data? Please explain your answer and provide supporting evidence wherever appropriate

We actively support any actions which promote accurate consumption data in the market. However, charging would need to be rationalised. The provision of YVE may still be necessary for premises remaining vacant, where access can not be obtained to internal meters. Monitoring the use should seek to highlight over dependency whilst recognising its legitimate usage.

Consultation question 11 : If we were to introduce a financial incentive on YVEs, how could arbitrarily low YVEs entered into CMOS be identified in a proportionate way (for example via one or more simple rules)? If we were to introduce a reputational incentive on the use of YVEs, how could such a reputational incentive be strengthened?

It will be known that some premises remain vacant or that their operation will be significantly reduced and these positions to be such for a further period of recovery and YVE still an appropriate provision.

YVE as a proportion on previous years consumption and factored deviation to trigger as 'low' or 'false'. Premises were operational for 2 months of the calendar year prior to the first lockdown

measures and so no estimate should be below 0.17 of previous years consumption. It would be appropriate to financially penalise this abuse of the provision but counterproductive to the support requirement to penalise other potentially legitimate low entries.

A proportion of charges could be redistributed to those retailers who either had not undertaken the adjustments or those who revise their adjustments accordingly on occupancy update.

We would support a league table of use/appropriate use of this measure.

Consultation question 12 What are your views on how we can better (financially or reputationally) incentivise Wholesalers to work constructively with Retailers during the unwinding of the temporary vacancy flag and to improve the accuracy of data in CMOS?

NCC as a self-supplier as well positioned to understand the current occupancy of premises within our portfolio. We would still welcome wholesalers sharing district metering data to target occupancy conversations. A reputational league table based on feedback surveys to reflect the support they are providing to the industry in this measure.

Consultation question 13: Do you agree with the expectations set out above, which will guide trading parties through the unwinding of the temporary vacancy flag?

Yes. The approach is appropriate to the unwinding but specific direction is required to ensure its success.

Consultation question 14: Should Market Performance charges come back into effect from end September 2020 or end October 2020? Please explain your answer and provide supporting evidence wherever appropriate.

We would endorse resumption of charges from the end of September 2020. Retailers have already begun to undertake meter reads and feel this would be an adequate transition period. We would query whether areas in local lockdown measures should be exempt from charges for the duration of their lockdown and an agreed transition period so as to not undermine the efforts of the local lockdown. We would hope that measures being taken across the country limit the number of local lockdowns in the latter stages of this calendar year but feel there should be the provision agreed in advance to cover the eventuality.

Consultation question 15: Should OPS charges be introduced before MPS charges? Please explain your answer and provide supporting evidence wherever appropriate.

We do not see any cause to separate the types of charging and feel it most appropriate to resume both at the same time for market consistency.

Consultation question 16: Should non meter reading MPF charges come into effect before meter reading MPF charges? Please explain your answer and provide supporting evidence wherever appropriate.

We do not see any cause to separate the types of charging and feel it most appropriate to resume both at the same time for market consistency.

Consultation question 17: Note – responses to this question will be shared with MOSL. Of the 3 options identified in relation to credit security requirements, which option do you support and why? Please explain your answer and provide supporting evidence wherever appropriate. Which

option is most compatible with furthering customers interests and why? Covid-19 and the business retail market – Consultation on next steps 44

In relation to the operations of NCC we would support either option 2 or option 3. However, considering the market as a whole and best customer interests we consider option 2 would be most appropriate

Consultation question 18: Do you agree that the CPCoP does not require amendment in light of the proposals set out in this document? Please explain your answer and provide supporting evidence wherever appropriate.

We consider the proposals are 'soft' changes and do not require amendment of the CPCoP.