

From: [Rosalind Carey](#)
To: [Georgina Mills](#)
Cc: [Phillip Mills](#); [Charging](#)
Subject: RE: Ofwat consultation on proposed changes to wholesale charging rules
Date: 01 September 2021 15:17:05
Attachments: [image001.png](#)

Georgina,

Many thanks for bringing this to our attention.

Removing the requirement on wholesalers to produce the statement of significant changes in July does not seem to be a major concern to retailers, providing that where any major changes are envisaged to charging structures, retailers are given as much notice as possible – in order to assess the impact on customers and to manage any implications. The wording in the consultation paper (final paragraph of 2.2.1) is useful in this respect. In practice, it would also be useful if wholesalers were required to share their impact assessments to help inform and support retailers’ customer handling strategies.

My only hesitation is that given the work of the RWG on wholesale tariff simplification, there are likely to be some very significant changes to charging structures over the next few years, and the more notice retailers and customers receive of these changes the better. However, for change of this scale, I imagine that it would be more appropriate to take an industry-wide approach (rather than leaving it to individual wholesalers to give notice), such that changes are rolled out across the market in a centrally-coordinated way, giving all stakeholders sufficient time to plan and manage the impact. I believe this would give retailers comfort.

Please don’t hesitate to contact me again if I can be of help.

Kind regards

Ros

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