Reassociation of OVOs short codes with OVO Energy Ltd



Background

Rationale behind the reassociation

With the recent introduction of license conditions on control over material assets, OVO has been engaging with Ofgem on how best our licensed gas and elec supplier companies maintain appropriate control over their business when assets, systems and employees are held by, or contracted through, OVO Energy Ltd.

OVO's supplier licensees:

- OVO Electricity Ltd
- OVO Gas Ltd
- OVO (S) Gas Ltd

To resolve this, Ofgem requested that OVO obtain supplier licenses for OVO Energy Ltd and only use this company moving forward for any supplier activity. Ofgem are tracking our progress against these commitments and we have indicated that we are likely to meet them by the end of 2024.

To that end we:

- Have gained a gas supplier licence for OVO Energy Ltd (granted by Ofgem),
- We have entered into an asset transfer agreement between OVO Gas Ltd and OVO (S) Gas Ltd, and OVO Energy Ltd to assign gas supply contracts to the new licensee.
- Are seeking to reassign our gas short codes from OVO Gas Ltd and OVO (S) Gas Ltd to the new licensee:
 - o SOP, STH, LUM, SPQ, OVO



Request for COMC

Overcoming prohibition under 4.3 of MDD MPIV Doc

4.3 of the Market Domain Data Market Participant Identity Verification Approach Document notes:

 "A Market Participant Identity can not be reallocated to another Market Participant for different Licenced Legal Entity for the Supplier Role Type."

We are seeking a derogation from this rule to reassociate our supplier MPIDs with OVO Energy Ltd.

- This would align conceptually with the method that we are using under BSC, being a mainly cosmetic change only.
- The only alternative to a derogation from this rule would be Change of Supplier. However, CoS would:
 - o place capacity burdens on industry,
 - o require systems changes,
 - potentially cause negative customer impacts, and
 - o frustrate Ofgem timescales
- therefore preferred method is a reassociation of OVO's supplier short codes.

Furthermore, there is precedent for derogation from this rule:

MAP ID "SSL" was <u>approved</u> for novatation to Maple Co following presentation of this letter <u>here</u> and slides <u>here</u>

Other considerations:

What are the impacts to PEMS contracts?

