



Energy Prepayment Review
Competition and Markets Authority
Victoria House (6th Floor South East)
Southampton Row
London
WC1B 4AD

8 July 2019

Dear Sirs

Energy Prepayment Review – provisional decision

We're Green Network Energy – an established mid-sized supplier serving domestic, small business and industrial energy consumers in Great Britain (GB). We're part of Green Network Group S.p.A. who are the fourth largest power supplier by volume in the Italian energy market, a pan-European commodity trader and an operator of solar, wind and biomass generation assets.

Thank you for the opportunity to respond to the provisional decision on the review of the Prepayment Charge Restriction. We have set out a high-level response to the proposals below.

- We agree with the recommended proposal to move to the Ofgem Default Tariff Cap methodology.
- We agree with the timeframe for implementation of October 2019.
- We agree with the proposed amendments to Supplier Licence Conditions.
- We agree with the proposal to extend protection beyond 2020, particularly given the current level of development of SMETS2 prepayment technology.
- We strongly support the recommendation under paragraph 5.7 to consolidate the Prepayment Charge Restriction and Default Tariff Cap into one protection scheme. Currently, the end-date of the two protection schemes are not aligned. A single protection mechanism would enable a simpler transition away from the use of price caps.

If you have any questions, or wish to discuss anything further, please contact Samuel Arnold by email [\[REDACTED\]](#)

Yours sincerely

Pietro Di Maria

Chief Operating Officer