

## Combined Consultation on Licence Modification for Provision of Information

### Phoenix Energy response

Phoenix Energy Group Ltd (**Phoenix Energy**) welcomes the opportunity to respond to the Utility Regulator's (UR) "Combined Consultation on Licence Modification for Provision of Information".

As stated in our response to UR's December 2024 consultation, we understand UR's need for, and have supported UR in the provision of, information to allow it to fulfil its regulatory functions. We also welcomed the opportunity to review Licence Condition 1.4 to ensure that it remains transparent and reflective of current regulatory arrangements. The current drafting of Licence Condition 1.4 is cumbersome and we welcomed the transparency that the proposed amendments will bring.

We note the two minor additional changes now proposed to Licence Condition 1.4 and recommend two further minor changes. Both relate to Condition 1.4.2 of our Licence. We recommend:

#### 1.4.2 Licensee to comment on accuracy of information

The Licensee shall after receiving a request from the Authority for reasoned comments on the accuracy and text of any **Information** (including that which has been provided by the Licensee in accordance with **paragraph 1**) relating to the Licensee's activities under or pursuant to this Licence which the Authority proposes to publish under Article 7 of the Energy Order, give such comments to the Authority when and in the form requested.

is updated to:

#### 1.4.2 Licensee to comment on accuracy of information

The Licensee shall after receiving a request from the Authority for reasoned comments on the accuracy and text of any **information** (including that which has been provided by the Licensee in accordance with **Condition 1.4.1**) relating to the Licensee's activities under or pursuant to this Licence which the Authority proposes to publish under Article 7 of the Energy Order, give such comments to the Authority when and in the form requested.

Our understanding is that Condition 1.4.2 relates to any information relating to our licensed activities that UR proposes to publish under Article 7 of the Energy Order. This could be information obtained under Condition 1.4.1 or under other Licence Conditions. As "Information" is a defined term, we therefore recommend that this drafting is updated to reference the non-defined term "information" as recognised in Condition 1.4.2's title.



Secondly, the reference to “paragraph 1” in the Phoenix Licence should be updated to reflect our Licence structure, i.e. the reference should be to “Condition 1.4.1”.