



**Jonathan Brearley**  
Chief Executive Officer  
Ofgem  
10 South Colonnade  
Canary Wharf  
London E14 4PU

13 May 2025

Dear Jonathan,

**Urgent Call for an Updated Distributional Impact Assessment of Market-Wide Half-Hourly Settlement**

We are writing to you as the End Fuel Poverty Coalition to urge Ofgem to conduct an updated assessment of the distributional impact of Market-Wide Half-Hourly Settlement (MHHS) before the transition begins later this year.

In its *Decarbonisation Action Plan* (2020), Ofgem recognised that consumers would need to change the way they use energy and pledged to ensure that consumers—particularly those in vulnerable circumstances—would be protected and would not shoulder an excessive share of the costs.

However, the 2021 impact assessment used to support MHHS was based on limited and unrepresentative evidence, including a trial of consumers in London that excluded many vulnerable groups. Ofgem itself concluded (p.103):

*“There is very limited usable evidence available to quantify the potential distributional impacts across specific consumer groups of implementing MHHS, and to assess whether consumers will respond to the flexibility options it may facilitate.”*

The same assessment recognised that consumers who cannot shift their energy use may see little benefit from time-of-use tariffs, and that those remaining on flat tariffs could face higher charges.

Despite these risks and the significant increase in energy prices since 2021, we understand Ofgem does not intend to update its impact assessment. This, in our view, contradicts the commitments made in the Decarbonisation Action Plan.

A more accurate and up to date analysis is clearly necessary and we believe that there is better data available now enabling energy consumption and socio-economic characteristics to be linked.

We therefore call on Ofgem to carry out an updated distributional impact assessment of MHHS as a matter of urgency, ahead of implementation.

We would welcome the opportunity to discuss this further and look forward to your response.

Yours sincerely,

Maria Booker, Head of Policy, Fair By Design

Simon Francis, Coordinator, End Fuel Poverty Coalition

### **About the End Fuel Poverty Coalition**

The End Fuel Poverty Coalition is a [broad coalition of more than 100 anti-poverty, health, housing and environmental campaigners, charities, local authorities, trade unions and consumer organisations](#). It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

We believe that everybody has the right to a warm, dry home that they can afford to heat and power.

Members of the Coalition include: [Action with Communities in Rural England](#), [ACE Research](#), [Age UK](#), [All Birmingham's Children](#), [Austerity Action Group](#), [Association of Green Councillors](#), [Association of Local Energy Officers](#), [Association for Decentralised Energy](#), [Asthma + Lung UK](#), [Basingstoke & Deane Borough Council](#), [Beat the Cold](#), Bruton Town Council, [Camden Federation of Private Tenants](#), [Carers Trust](#), [Child Poverty Action Group](#), Church Poverty Action, [Chartered Institute of Environmental Health](#), [Chartered Institute of Housing](#), [Community Action Northumberland](#), [Centre for Sustainable Energy](#), [Climate Action Network West Midlands](#), [Debt Justice](#), [Disability Poverty Campaign Group](#), [Disability Rights UK](#), [E3G](#), [Energise Sussex Coast](#), Energy Advice Line, Energy Cities, [Epilepsy Action](#), [Exeter Community Energy](#), Fair Energy Campaign, [Fair By Design](#), [Foster Support](#), [Friends of the Earth](#), [Fuel Poverty Action](#), Fuel Poverty Research Network, [Generation Rent](#), [Good Law Project](#), [Greenpeace](#), [Groundwork](#), Hackney Foodbank, [Heat Trust](#), Home Start Oxford, [Independent Age](#), [Independent Food Aid Network](#), [Inner City Life](#), [Joseph Rowntree Foundation](#), [Lambeth Pensioners Action Group](#), [London Borough of Camden](#), London Borough of Lewisham, [Marie Curie](#), [Mencap](#), [Mayor of London](#), [MECC Trust](#), Moorland Climate Action, [National Pensioners Convention](#), National Union of Students / [Students Organising for Sustainability](#), NCB, [National Energy Action](#), [New Economics Foundation](#), National Federation of Women's Institutes, [Northern Health Services Alliance](#), [Oxford City Council](#), [Positive Money Tower Hamlets](#), [Plymouth Community Energy](#), Redcar & Cleveland Council, [Repowering London](#), Retrofit Bruton, Right To Energy Coalition, [Rossendale Valley Energy](#), [Ryecroft Community Hub](#), [Save the Children](#), [Sense](#), [Severn Wye](#), [Scope](#), [Shaping Our Lives](#), [Social Workers Union](#), [South Dartmoor Community Energy](#), [South East London Community Energy](#), [Southwark Group of Tenants Organisations](#), [South West London Law Centres](#), [Stop The Squeeze](#), [Tamar Energy Community](#), [Thinking Works](#), Uplift, [UNISON](#), Warm & Well North Yorkshire, [Warm & Well in Merton](#), [Winter Warmth Network](#), [Young Lives vs Cancer](#), [361 Energy](#).

The Coalition is also part of the [End Child Poverty Coalition](#) and the [Renters Reform Coalition](#). We work closely with [Energy Action Scotland](#), [NEA Wales](#) and the [Fuel Poverty NI coalition](#). The

coordination for the [End Fuel Poverty Coalition](#) is provided by social enterprise [Campaign Collective](#).

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