

Energy market investigation

Provisional Findings

Response by

The logo for TheEnergyShop.COM is displayed within a dark blue rectangular box. The text "TheEnergyShop" is in a light blue, sans-serif font, with "The" in a lighter shade and "EnergyShop" in a darker shade. To the right of "Shop" is a small, light blue square containing the text ".COM" in white, uppercase letters.

www.TheEnergyShop.com

Non-Confidential

October 2015

1. Introduction

On 7 July 2015 the Competition & Markets Authority published, amongst others, its Summary of provisional findings report and its Notice of possible remedies report. In this paper we are pleased to provide our response.

Definitions

Within this submission certain abbreviations have the following meanings.

AEC means Adverse Effect on Competition

PPC means Pay Per Click

PCW means Price Comparison Website

SVT means Standard Variable Tariff

TCR means Tariff Comparison Rate

TIL means Tariff Information Label

TPI means Third Party Intermediary

WOM means Whole of Market

About TheEnergyShop.com

TheEnergyShop.com is an award winning energy price comparison and switching website. Since launching our new website in June 2012 we have won a number of prestigious awards some of which are listed below.



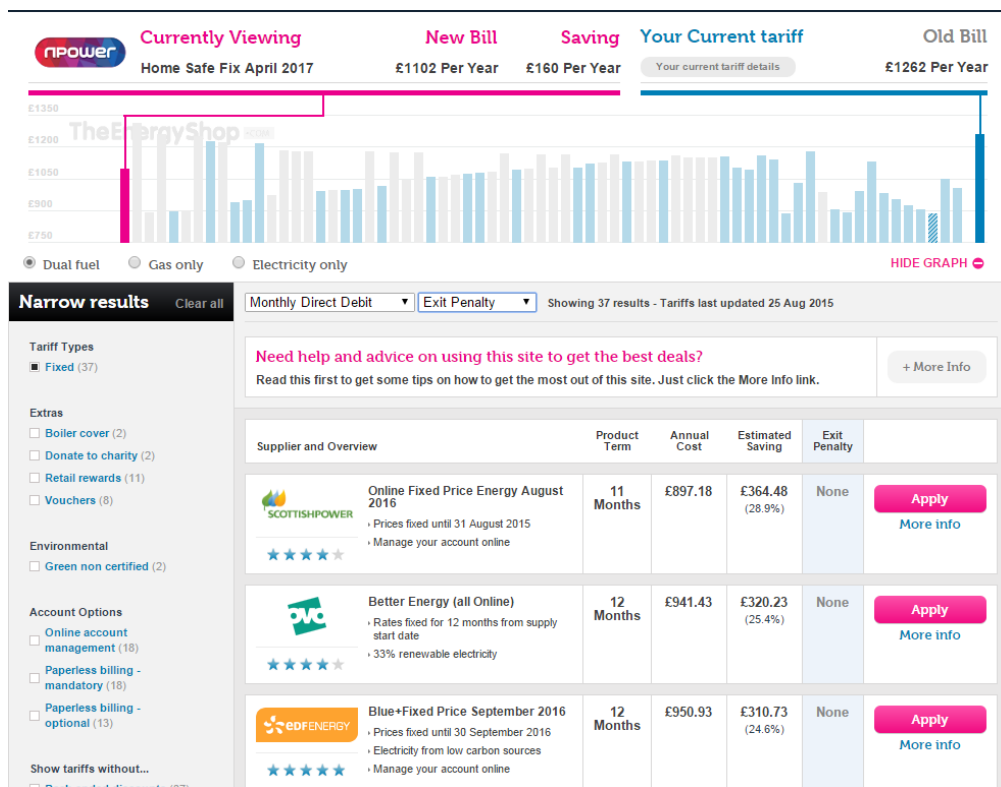
We have invested heavily in creating a website and user experience that is quick and extremely simple for users to understand. We are probably the only website that does anything truly innovative in the energy PCW sector. Key features of our product offering include;

- 1 page data capture to results screen - no personal information required to get a quote
- Only 5 keys data inputs to get an all of market quote

- Whole of market results in a single screen - patent pending technology driving a unique graphical representation of the whole market.
- Filtering on 16 variables

All of which means customers get energy quotes and savings quicker than any other comparison site. This month we were voted by users to be the **Best Comparison Site** in the Personal Finance Awards 2015/16. Not only did we beat, but we also unseated uSwitch, who were last year's winner of the award.

However, as a specialist service offering just domestic energy comparison and switching services, we are particularly exposed and vulnerable to regulatory interventions such as Ofgem's WOM obligations and the predatory / parasitic actions of energy suppliers that it encourages. It has had a massive adverse impact on conversions and has undermined our ability to continue investing in innovative products for consumers.



2. Price Comparison Sites Overview

SUMMARY

- The 2 firm concentration ratio in the energy PCW market is 75%. Our analysis suggests that the 3 firm concentration ratio is in the region of 85-90%.
- Commissions paid to the Big 3 energy PCWs (which includes MoneySavingExpert) drives up the cost of energy for consumers.
- High commissions paid to the Big 3 means that they dominate substantially all distribution channels. Smaller PCWs are priced out of distribution. There is limited contestability for distribution channels. Competition is ineffective.
- We believe that the dominant players, particularly uSwitch, are using their market power to force smaller players out of the market. This is an abuse of a dominant market position and we ask the CMA to investigate whether uSwitch and others are in breach of Competition Law in this respect.
- Ofgem's Confidence Code is so detailed and prescriptive that innovation is effectively stifled leading to entrenched positions of the dominant players who no longer face any credible competitive threats.
- Both the PCW market and the Ofgem Confidence Code are in desperate need of reform.

Market Concentration

The CMA's current energy market investigation has already revealed that the energy price comparison market is highly concentrated. With a 2 firm concentration ratio of 75% it effectively operates as a monopoly. This results in higher customer acquisition costs for energy suppliers, which in turn drives up the price of energy for consumers generally. It can be reasonably inferred from submissions made to the House of Commons Energy and Climate Change Committee on 3 February 2015 that the 2 dominant players in the energy price comparison market are uSwitch and Moneysupermarket (which includes sales conducted through MoneySavingExpert). If we add energyhelpline, as the third largest player, we likely have a Top 3 concentration ratio of 85-90%. We refer to these three sites as the Big 3.

Commissions

The CMA has also found that the commission paid by energy suppliers to PCWs for each switch generated by a PCW ***"varies but is most commonly between £15 and £35 per fuel. This may vary depending on a number of factors such as the volume of switches a PCW generates and whether the customer used the PCW's website or call centre"***

The level of commission paid to PCWs is **the single key factor** determining the ability of a PCW to compete for customers, whether directly or through distribution partners. In turn it will determine whether a business will succeed or fail.

In front of the House of Commons Energy and Climate Change Committee hearing on 3 February 2015, Moneysupermarket disclosed that they earned, on average, £29.36 per fuel in 2014 (£58.72 per dual fuel account).

In front of the same Committee, uSwitch were not specific on their commission levels but made a general comment that **“On average it would be around £30.”** (£60 per dual fuel).

MoneySavingExpert is a subsidiary of MoneySupermarket. From the MoneySavingExpert 2014 financial report and accounts we learn that MoneySavingExpert is, commercially at least, predominantly an energy sales organisation. **“The key driver of the business’ growth has been utility revenues,...”**. MoneySavingExpert’s claims about the full transparency of their service is a little difficult to reconcile with their non-disclosure of commission rates but we do know, from an interview that Martin Lewis gave on BBC Radio 5 live on 20 October 2014, that MoneySavingExpert earns between £50 and £70 per dual fuel switch.

Profitability

The operating margins of the Big 3 are summarised in Table 1 below.

Table 1 – PCW profits and operating margins

	uSwitch (12/2014)	MoneySuper market (12/2014)	MoneySaving Expert (12/2014)	Energyhelpline (03/2014)
Revenue (£m)	34.63	242.1	21.32	16.52
Operating profit (£m)	8.32	75.0	1.55	1.11
Operating margin (%)	24.0	31.0	7.3	6.7

Energyhelpline is almost exclusively focussed on energy, uSwitch is still mainly focussed on energy, while energy switching is small part of Moneysupermarket’s overall business. This suggests that the margins on energy switching are generally lower than those for other products such as Car insurance. It also shows that, at scale, an energy PCW earning commissions of £30 per fuel switched can earn net margins of between 10% and 25%.

Put another way, a PCW operating at scale, would see its profits wiped out if commissions fell to between £27 per fuel switched (when on a 10% net margin) and £22.50 per fuel switched (if operating on a 25% margin).

All things however are not equal. Smaller PCWs do not have the economies of scale of the dominant sites and are likely to fall into losses even at commission levels in the £22.50 to £27.00 range. Profitability analysis suggests that sites earning less than £25 per fuel will likely fail in the long term given the current market structure. The CMAs findings worryingly show that some PCWs receive commissions as low as £15.00 - these businesses are clearly not viable or sustainable.

Marketing and Distribution

There are 4 main routes to market by which PCWs can distribute their products to customers.

1. Offline Brand Building (for example TV advertising).
2. Online Marketing - principally Paid Search (principally Google Adwords).
3. Distribution Partnerships (affiliate programmes, white label partnerships with major third party brands such as GoCompare).
4. Cashbacks (these are not covered in this submission).

TV advertising can be a very effective way of building awareness of the benefits and savings from switching and can drive the engagement of new customers. It can help to grow the overall market. The dominant players have the scale and resources to promote themselves in this way. In contrast the smaller PCWs lack the financial resources to go down this route.

In contrast paid search via Google Adwords is mainly about capturing engaged customers who are already in the market looking to switch. Paid search does little to engage new customers. It is largely about capturing share of the current market. All other things being equal, the higher the price an advertiser pays for its Ad on Goggle the higher up the page its advert will appear for the keyword searched, and the greater the number of clicks and sales the Ad will generate. It follows that the higher the commission rate per switch a PCW earns the more it can bid for its advert and the more sales it will generate.

Distribution partnerships operate almost invariably via a revenue share model. Again it follows that the greater the commission revenue earned per switch, the more successful a PCW can be winning distribution deals (the more revenue there is to share). From the House of Commons Energy and Climate Change Committee we learn that the larger white label energy comparison sites earn commissions of £22 per fuel (for GoCompare and CompareTheMarket) and £23 per for Confused.com. These are the commissions they receive from the PCWs that operate the service on their behalf (mainly energyhelpline). The commission rates that the larger sites pay away to white label partners are likely to be on a par with, if not greater than, the commissions earned by the smaller PCWs. This means that smaller PCWs are effectively locked out in this market.

One would expect that the dominant players might invest a large portion of their revenues in brand building to grow the market. However, we learn that instead they throw their marketing dollars at attracting engaged consumers primarily through Google Adwords.

In front of the House of Commons Energy and Climate Change Committee, Moneysupermarket disclosed that: ***“Our revenue was £226 million. We spent roughly £100 million on marketing. That includes money spent with Google, which is by far the largest marketing tool for us to market on, which is a paperclip (correction Pay Per Click model).”***

uSwitch also stated that:

“In the accounts that we have for 2013, because we have not finalised 2014, the revenue was £34 million and our marketing costs were £14 million. Again, this is across multiple products and not just related to energy. What we would typically spend on TV advertising, for instance, would only be a few hundred thousand, less than a million. A lot of the money that we spend is around digital marketing, whether it is Google or display advertising.”

The current structure of the energy PCW market is one where a very small number of dominant players charge high commissions to energy suppliers, the effect of which is to push up energy bills for all consumers.

Rather than invest those revenues in growing the market, they concentrate instead on capturing engaged consumers through Google Adwords or distribution partnerships. On Google Adwords, they bid up the price of adverts to levels that will put smaller PCWs into a loss making situation and ultimately out of business.

Appendix 1 shows a number of screenshots showing the cost of advertising on a range of high volume energy comparison related keywords on Google Adwords. It also shows who is responsible for bidding up the price – principally uSwitch but also Moneysupermarket. The screenshots show.

- uSwitch driving up the price of adverts for the term “energy comparison” to £9.76 per click.
- uSwitch driving up the price of adverts for the term “energy price comparison” to £7.91 per click.
- Moneysupermarket.com driving up the price of adverts for “compare energy prices” to £7.42 per click.
- Price of adverts for “compare energy price” driven up to £9.86 per click.
- uSwitch sitting on the No.1 ad position for the trademarked term theenergyshop.
- uSwitch sitting on the No.1 ad position for the trademarked term theenergyshop and openly using the trademark in its advert. This is also therefore a blatant case of trademark infringement and / or passing off.
- uSwitch sitting on the No.1 position for the term My Utility Genius.
- uSwitch sitting on the No.1 position for the term unravelit.
- uSwitch sitting on the No.1 position for the term Simplyswitch.

Appendix 1 also shows that uSwitch and Moneysupermarket are nowhere near as aggressive in bidding on each others’ trademark terms.

- uSwitch ad NOT appearing for the term moneysupermarket
- moneysupermarket ad NOT appearing for the term uswitch

The effect for smaller PCWs is this.

- They are unable to compete fairly for traffic on Google Adwords (even for their own trademarks)
- They are unable to compete for larger distribution partnerships.
- They are unable to procure the financial resources to engage in mainstream media advertising. Even if they could the Ofgem WOM obligation makes it unviable to consider such an option.

Market dominance itself is not illegal, but abuse of a market dominant position is. There can be no plausible explanation as to why uSwitch would need to outbid us by a factor of over 10 times on our own trademark other than to try to force us into a significant loss making position should we attempt to capture the customer traffic that was searching us out. In the process we either lose sales or incur substantial losses – neither of which is sustainable or viable. uSwitch’s action is clearly an effort to try to drive us out of business. They appear to be doing exactly the same to the other smaller PCWs.

We believe that uSwitch is abusing a dominant market position and we ask the CMA to investigate whether uSwitch and others are in breach of Competition Law in this respect.

3. Tariff Data and affects on the development of competition (domestic markets)

We have previously raised the issue of tariff data and how existing processes not only create inefficiency but also impose additional costs on PCWs and customers. Poor data quality is also confusing for consumers, which in turn discourages consumers from switching.

The issue is further compounded by the Confidence Code where all the obligations for data processing and accuracy are imposed on PCWs meaning energy suppliers have no incentives to invest in efficient data processes nor do they pay any penalties for their mistakes. A lack of obligations on energy suppliers breeds complacency and inefficiency. PCWs on the other hand are required to adapt to the working processes of the energy suppliers (irrespective of whether there is a commercial agreement in place or not).

With each new regulatory intervention (such as TILs, TCRs and the extremely damaging and misleading Personal Projections) each PCW has to adapt to each individual suppliers' interpretation of the regulations. These interpretations may, and often do, change frequently.

With each individual accredited PCW having to build and maintain separate databases using these simply archaic processes, these needless costs are replicated a dozen times over. The loss of efficiency and duplicated cost is simply colossal.

The issue has been raised at industry level on numerous occasions but Ofgem does not see this as a priority. The issue has recently come to light again in respect of its impact on new industry initiatives. On 30 July 2015 DECC held a meeting on Machine readable data (namely MiData and QR Codes). The key points from that meeting are copied below.

Key points

- Current issues:
 - Data consistency issues with naming (supplier, tariff and payment method) - general acknowledgement that QR codes has highlighted an existing issue rather than created it – will also be a challenge for midata and other digital data exchanges.
 - Placement of images on bills with multiple codes leading to consumer confusion
 - Size of codes / potential overlays on codes which are preventing effective scanning
 - Identifying time of use tariff consumption and rate information (eg Economy 7 day/night rate)

Copied below for clarity.

"Key points

- **Current issues:**
 - *Data consistency issues with naming (supplier, tariff and payment method) - general acknowledgement that QR codes has highlighted an existing issue rather than created it – will also be a challenge for midata and other digital data exchanges."*

It is clear that the issues of data quality and data consistency are now jeopardising the implementation of new industry initiatives like QR codes and midata. We raise this again because we believe this issue must be finally resolved and we believe that one of the proposed remedies, an Ofgem PCW, is the ideal mechanism to make it happen.

4. Domestic Confidence Code vs Non-Domestic TPI Code

We have argued previously about the imbalanced and incoherent way in which Ofgem seems to persecute the online domestic PCWs yet allows the telesales activities of domestic PCWs, Collective Switching Schemes and, in particular, non-domestic TPIs, to run wild.

In its 28 June 2013 consultation **Third Party Intermediaries: exploration of market issues and options** Ofgem wrote:

“5.5. We have been aware of increasing issues in the non domestic market over the last 5 years and in our RMR we considered a number of options including accrediting a TPI Code. Similarly we had strong calls from stakeholders that we needed to progress work in this area as soon as possible.”

The impact of these “issues” can be clearly seen in the CMAs Summary of Provisional Findings report which showed that supplier margins in the SME market were 167% higher than those in the domestic market (which arguably are also considered to be too high).

173. “We have also found that a substantial number of microbusinesses appear to be achieving poor outcomes in their energy supply. EBIT margins were generally higher in the SME markets than other markets (8% rather than 3% in domestic markets and 2% in I&C markets) and beyond what appears to be justified by risk. We observed that average revenues are substantially higher on the default tariff types that less engaged microbusiness customers end up on, compared with acquisition or retention tariffs, which require an active choice by customers. These differences in revenues between tariffs go beyond what is justified by costs.”

Despite this, more than 2 years after the initial consultation on a non-domestic TPI Code, we still have no Code. More worrying still, the Proposed Code, being effectively written, audited and governed by the industry itself, is highly unlikely to address any of the issues that have given rise to non-domestic TPIs customers consistently paying way over the odds for their energy.

In this section we have compared key features of the current Confidence Code for domestic PCWs with those of the proposed Code for non-domestic TPIs. These are summarised below in **Table 2**. The Ofgem Code for online domestic PCWs is based on the latest version of the Code published on 25 March 2015. The Ofgem Draft Code of Practice for Non-domestic Third Party Intermediaries is that published on 1 June 2013. If there is an update we can't find one published on the Ofgem website.

A comparison of the features shows the stark difference in virtually all aspects of the two Codes.

A superficial glance at the different Code features might lead one to conclude that the Codes were drawn from completely different product markets, perhaps even different countries or jurisdictions. It seems unfeasible that a single regulator, operating in the same country, could come up with such diametrically opposed sets of regulations for markets that are not only related but actually overlap.

The domestic PCW Code is staunchly anti-PCW. The proposed Code for non-domestic TPIs is most definitely pro-TPI friendly. For the non-domestic TPI Code, the TPI industry has been allowed to come up with its own set of rules that it will both self-administer and self-audit. This is an industry which, when serving its customer base, resulted in those customers paying margins 167% greater than the inflated margins paid by domestic customers.

Such an approach to regulating an overlapping market makes no logical sense. One has to ask whether Ofgem has been unduly influenced by a powerful industry lobby. Indeed one has to question whether Ofgem has been negligent in its approach or indeed it if it has acted with integrity in reaching the decisions it has. We would therefore ask the CMA to:

- Audit Ofgem's consultation and decision processes to see if they are fit for purpose and that they are being followed consistently and correctly applied.
- Investigate whether Ofgem's inconsistent policies with respect to TPIs in similar, related and over-lapping markets amounts to prejudicial and unfair discrimination against domestic PCWs.

Furthermore the lack of transparency in the SME and microbusiness market is an area of great concern to us.

The benefits of PCWs for consumers in terms of creating transparency and reducing search costs have been well documented by the CMA. Yet despite this, transparent online services for SMEs have failed to develop in the normal way to satisfy these needs. More than 15 years after commercial market deregulation and the widespread adoption of the Internet, one would have expected transparent online services such as these to be ubiquitous. This has not happened. Certain factors have clearly been restricted the development of transparent online services in this market to the detriment of consumers. We would therefore ask the CMA to investigate whether there have been agreements or concerted practise between energy suppliers and / TPIs which have had as their object or effect the prevention, restriction or distortion of competition.

Table 2 – Comparison of Domestic PCXW and non-Domestic TPI Codes

Requirement	Domestic PCW	Non-domestic TPI
Consultation start date	7/08/2014	28/06/2013
Decision	31/1/2015	Still waiting
Implementation	1/4/2015	Still waiting
Independence and impartiality - must be independent of any gas or electricity supplier.	Yes	No (as long as they say so)
Advertising	Cannot display advertising from suppliers or their agents/ brands	No restriction
Tariffs and price comparisons - must use all reasonable endeavours to include price comparisons for all available domestic tariffs, where applicable for all available payment types, for licensed suppliers (including for any agents, affiliates, and brands operating under the licence of a supplier), for gas, electricity and dual fuel.	Yes	No
Must compare all historic tariffs	Yes	No
Display TIL for each tariff whether it is sold or not	Yes	No (Customer does not even need to be shown rates unless requested)
Must manage its own service and use its own database and calculator	Yes	No
Must explain the impact of filtering tariffs for consumers	Yes	No
WOM by default?	Yes	No
Use a mis-leading approach to calculate current tariff cost in order to over-estimate the current bill and over-hype the saving.	Yes	No
Updating tariffs	2 working days	No requirement
Auditing		
Annual independent audit	Yes	???
Ad hoc audits by Ofgem	Yes	No
Governance	Ofgem	Self-assessment (I mean really???)
Putting lots of other stuff on onto the TPI website which is really Ofgem's job but is convenient for Ofgem to offload it onto the TPI.	Yes	No
Additional Requirements		“Clear and truthful marketing” "Honest guv, it really is the right deal for you... Trust me. I'm in the Code"

5. TheEnergyShop.com response

In this section we present our response to specific questions. Where remedies have been omitted it is because we have no specific comments to the questions or issues raised.

Remedy 1 – Introduction of a new standard condition to electricity generators’, suppliers’, interconnectors’, transmission, and distribution licences to require that variable transmission losses are priced on the basis of location in order to achieve technical efficiency.

No comment

Remedy 2a – DECC to undertake and consult on a clear and thorough impact assessment before awarding any CfD outside the CfD auction mechanism.

One of the more shocking revelations from the Provisional Findings Report was that DECC awarded an offshore project at a price that was some 30-60% higher than it would probably have achieved in a competitive bidding process. These excess costs, estimated at £250-310m a year over 15 years will land squarely onto consumer bills. That is an overspend of £3.75-£4.68 billion, adding 1% to energy bills from a single project. 1% on energy bills may not sound like a lot but put into context the overspend is equivalent to:

- 8 to 10 brand new state of the art 750-bed world class standard hospitals such as the new Royal Liverpool Hospital, or
- 100 to 130 1,300 pupil schools or academies, or
- 12,000 to 15,000 new nurses per year for 15 years.

The sheer scale of this disastrous contract award should put a restriction on the ability of DECC to award any CfD above a notional value of say £10m, outside of the CfD auction mechanism. It also begs the question how this award could have been allowed to happen and should merit a full independent investigation.

Remedy 2b – DECC to undertake and consult on a clear and thorough assessment before allocating technologies between pots and the CfD budget to the different pots

We believe that full, open and transparent consultation is required to ensure that investment decisions are based on sound and rigorous value-for-money analysis.

Remedy 3 – Remove from domestic retail energy suppliers’ licences the ‘simpler choices’ component of the RMR rules.

SUMMARY

- The 4 tariff rule should be relaxed in a controlled way with controls and caps remaining in place.
- New tight conditions should be imposed to define what a tariff is and to prevent some of the current issues and abuses we see with the 4 tariff rule.
- Restrictions on discounts and complex tariff structures should remain in place or be further simplified.
- Relaxation of the 4 tariff rule will **NOT** increase competition between PCWs due to the concentration of market power in a very small number of firms. Additional steps need to be taken to address the market dominance of the Big 3 PCWs.
- The WOM obligation should be removed irrespective of any changes to the 4 tariff rule. It undermines the PCW market with adverse longer term consequences for consumers. It imposes an unlawful cross-subsidy onto PCWs and on commission paying energy suppliers.

INTRODUCTION

In general we believe that that the ‘simpler choices’ component of the RMR rules has been very beneficial in addressing tariff complexity and confusion for consumers.

Prior to the introduction of the 4 tariff rule, and the ban on complex discounts, the domestic energy market was flooded with copy cat tariffs many at identical price points. Many of these were designed to flood PCWs with product to crowd out offers from competing suppliers. Tariff structures became so complex that understanding an energy bill calculation was well beyond the numerical reach of well over 80% of the population.

In our view, the 4 tariff rule has had the following positive impacts.

- Tariff structures and energy bills became simpler and easier to understand (although substantially all of this benefit has now been undone by Ofgem’s mandatory introduction of TCRs and the use of blended tariff calculations in calculating Personal Projections which have unnecessarily complicated bills and price comparisons).
- Energy suppliers have had to focus their efforts on designing products that might have some genuine consumer benefit and which were differentiated from competitors. The knock on impact of this has been.
 - Removal of badly designed copycat products.

- Focus on competing with discounted tariffs vs SVTs (greater savings benefit for consumers).
- A significant shift towards fixed tariffs (offering price certainty for consumers).
- Removal of exit penalties from non-standard tariffs, particularly in the case of the Big 6 energy suppliers. We believe that this has happened because, with fewer product options, suppliers are looking to differentiate themselves in other ways and ditching the exit penalty is a great additional product feature. This is a hugely positive step as it removes barriers to switching.

We agree that the 4 tariff rule does constrain the ability of **some** suppliers to offer a wider range of tariffs (for example bespoke deals with PCWs). It is after all a constraint and that is what constraints do. However, it should be noted that not all suppliers operate with even their full allocation of 4 tariffs so the empirical evidence on whether this is a real constraint is mixed.

Despite this, the 4 tariff rule has still not prevented certain suppliers from:

- Launching tariffs on a daily or weekly basis meaning that consumers have a bewildering array of over 50 tariffs to pick from when trying to find their own tariff on a PCW for comparison purposes.
- Doubling up on the 4-tariff rule by launching online/offline or paper/paperless versions of their tariffs. This is becoming more prevalent and bringing back unnecessary tariff proliferation.

We believe that it is worth exploring with consumers whether this level of tariff proliferation is causing confusion, is disengaging consumers and so is creating an AEC.

While we believe that some level of relaxation of the 4 tariff rule might be justified, we are strongly against returning to a situation where customers can no longer understand their energy bill because of tariff complexity. Therefore we believe that any relaxation of the 4-tariff rule should have constraints in place that guard against and/or prevent the following.

- Tariff proliferation and copycat tariffs. We already see this happening where suppliers are now offering 2 variations of the each tariff (Online/Offline or Paper billing / Paperless billing). Where online discounts are material, for example £15.00 a year or more, the online and offline versions of a product are clearly 2 different tariffs and should be counted as such. Certain suppliers name their online/offline tariffs differently which supports the case that they are in fact different tariffs.
- An increase in the number of premium price tariffs (vs SVTs).

- An increase in short-dated tariffs (less than 12 months' duration). These are particularly worrying as they can easily be exploited in bait and switch strategies, are poorly understood by consumers and are not readily comparable on PCWs.
- An increase in bundled tariffs where the likely purpose of the bundle is to create an exit barrier to switching.
- A lack of tariff "understandability"

In terms of measuring consumer "understandability", we believe that the test of this should be whether a customer with **average adult numeracy levels** can understand their tariff calculation. Using average numeracy levels as a benchmark has the benefit of capturing vulnerable customers within its scope. This test should apply not just to tariff structures and energy bills, but concepts such as the TCR and the Personal Projection.

Our recommendations are:

1. The 4 tariff rule is relaxed but only modestly and on a tapered basis over time in order that the impact can be evaluated. For example, relax to 5 tariffs for first 12 months, extend 6 tariffs for the succeeding 12 months and evaluate after 2 years. We have no doubt that certain suppliers will find ways of gaming any new rules and so transitional arrangements would allow for assessment and re-evaluation along the way.
2. Within the X-tariff rule, Online/Offline and/or Paper/Paperless should each be counted as 1 tariff each within the tariff limit. So a supplier offering Online and Offline versions of a particular tariff would sacrifice 2 out of their X tariffs.
3. There should be an overall cap on the number of tariffs any supplier can launch in any given period; for example 10 per calendar quarter. This would serve a dual purpose. Firstly it would force suppliers to concentrate their efforts on building products of genuine consumer value rather than crowding out comparison tables with offers, or engaging in miniscule price changes and irrelevant tit-for-tat price matching against competitors. Secondly it would limit the number of current tariffs for comparison per supplier (although at a very high number) to ensure that consumers were not put off switching due to an inability to find their current tariff in a potentially limitless list of options.
4. The ban on complex tariffs should remain firmly in place and might even be further simplified to remove discounts altogether.

While addressing tariff rules, we believe this is a great opportunity to put in place restrictions on certain other current practises that are confusing to consumers, which undermine the ability of consumers to use PCWs effectively, which hinder and jeopardise the adoption of QR codes and Midata and which therefore lead to an AEC.

- Energy suppliers should not be able to offer more than one tariff at any given price point.

- All tariffs should have a clear and unique name (with version control if applicable) and this should be consistently applied across all communications with customers, consistently represented to and by TPIs / PCWs, and consistently represented in QR codes and MiData.
- It should not be permitted to have different concurrent prices under an identical tariff name. For example, we currently have a situation where one supplier offers 4 to 5 different prices under one tariff name (one live, the others preserved). This makes it extremely difficult for consumers to identify their tariff for comparison purposes and frustrates the comparison and switching process.
- It should not be permitted to customise a tariff name to a customer's tariff end date. This seems to us clearly designed to frustrate the comparison and switching process.
- There should be a cap on the frequency with which suppliers can launch / re-price new tariffs (subset of point 4 above). Will disengaged customers really benefit from seeing new tariffs launched every 2 days? Will engaged customers get further engaged by switching every day a price gets a little bit cheaper? We believe this activity actually dis-engages customers.

(a) Would this remedy be effective in increasing competition between domestic retail energy suppliers and/or between PCWs? What additional tariffs would energy suppliers be likely to offer that they currently do not due to the RMR restrictions?

This remedy **could** be effective in creating competition between PCWs but only if energy suppliers used the extra tariff flexibility to offer bespoke tariffs to PCWs where tariff prices offered reflected the level of commission charged by the PCW. For example, Tariff X was offered to ALL PCWs at a price of Y and a commission of X.

It will fail under any of the following circumstances;

Scenario 1 (Highly likely)

Where energy suppliers create a raft of direct to supplier tariffs and then use either an Ofgem PCW, or an Ofgem accredited PCW bound by a WOM obligation, to distribute the tariffs. This would create competition between energy suppliers but would not create competition between PCWs. It would merely function to further undermine the PCW market. Removing the WOM obligation from PCWs is necessary to prevent this from happening.

Scenario 2 (Unlikely)

Where energy suppliers create bespoke discounted tariffs with PCWs but only distribute these through the existing 3 PCWs that already control over 85% of the market (albeit trading lower tariff prices for lower commissions). This would lower prices for some consumers but would not increase competition among PCWs. It would only lead to further concentration of market power of the Big 3 PCWs leading to an AEC. We consider this scenario unlikely based on the bargaining power of the Big 3 PCWs who would be able to resist any reduction on commission levels. This is supported by the evidence presented below.

Scenario 3 (Highly likely)

Where energy suppliers create bespoke discounted tariffs with PCWs but distribute these only through the existing 3 PCWs that already control over 85% of the market **without** any contingent and matching reductions in switching commissions to reflect the lower prices offered to consumers.

It would lead to further concentration of market power of the Big 3 PCWs leading to an AEC. While this would lower prices for some consumers, given that commission levels for these PCWs would stay high (or might even increase as market power is further concentrated), then the cost of the discounted tariff offered to the PCW would be spread across dis-engaged customers leading to higher energy bills overall for the majority of consumers.

An energy supplier has a number of options when choosing whether and how to engage with PCWs. Here we present just 2 simplistic scenarios to illustrate a point. The scenario looks at 2 potential groups (C1 and C2) and ignores other channels outside this group. It looks at a potential 1,000 switchers who see and want to apply for the supplier's offer. It is assumed that those that see and can apply for the offer via the PCW, do. Those that see the offer but can't apply via the PCW are assumed to search out the supplier directly 50% of the time with the other 50% switching to a different supplier. This later assumption is bang in line with research on how consumers use PCWs.

Assumptions

Channel C1:	Small suppliers
Small suppliers commission rate:	£24.00 per fuel
Small suppliers market share (overall)	10% (20% share of C1 and C2 combined)
Channel C2:	uSwitch
uSwitch commission rate:	£30.00 per fuel
uSwitch market share:	40% (80% share of C1 and C2 combined)

Scenario 1

Fulfil via a small number of the smaller PCWs. Be listed, but not fulfil via uSwitch.

Per 1,000 fuels switched whether directly or indirectly via C1 or C2

C1 sales volume:	200
C1 commission:	$200 * £24.00 = £4,800$
C2 sales volume:	400 (assumes 50% drop out of potential switchers wanting the offer)
C2 commission:	$400 * £0.00 = £0$
Total costs:	£4,800
Total sales:	600

Cost per sale: £8.00

Scenario 2

Fulfil via uSwitch. Be listed but not fulfil via smaller PCWs.

Per 1,000 fuels switched whether directly or indirectly via C1 or C2

C1 sales volume: 100 (assumes 50% drop out of potential switchers wanting the offer)

C1 commission: $100 * £0.00 = £0$

C2 sales volume: 800

C1 commission: $800 * £30.00 = £24.000$

Total costs: £24,000

Total sales: 900

Cost per sale: £26.67

A cost conscious supplier looking to minimise acquisition costs, acting rationally, would clearly choose option 1, namely to engage the smaller PCW group for switch fulfilment and to game the Confidence Code by taking free leads from uSwitch. The added benefit of this approach is that it would give greater leverage to the supplier in its commission negotiations with uSwitch at a later point.

Collective Switching

Collective switching is an activity where a **pre-defined group** of consumers come together and aggregate their joint energy demand in order to negotiate preferential deals with energy suppliers.

Ofgem's proposals for regulating Collective Switching schemes closed on 7 April 2014. 18 months later and still nothing has happened. Free of regulation, the collective switching sector has grown dramatically to become the new "Wild West" of the energy switching market. We have previously written about the antics of The Big Deal and their aggressive sales activities and misleading savings claims for first their switch. We will update our research on this shortly.

(b) Removing the four-tariff rule is likely to increase the range of tariffs on offer and result in different tariffs being offered on different PCWs. Are there, therefore, any remedies that the CMA should consider alongside this remedy, to encourage domestic customers to use more than one PCW in order to facilitate effective competition between PCWs and domestic energy suppliers?

The most obvious way to do this is through an Ofgem PCW. The Ofgem PCW, having offered a comparison of tariffs, would then offer a list of accredited sites where the customer could confirm the offer and fulfil the transaction. This might be very similar to the way the Ofgem operated site goenergyshopping.co.uk currently lists accredited sites.

Offered a list of alternative PCWs, it seems almost certain that consumers will compare at least some PCWs. There will always be a tendency to go for recognised names/brands and this will always favour the larger multi-product players with deep pockets and advertising budgets. However, if the Ofgem PCW site drove sufficient volumes of customer traffic to PCWs it should encourage more PCWs to do brand advertising which in turn would increase consumer awareness of the benefits of switching and would grow the overall market.

(c) We note that if this remedy were to be imposed, Ofgem’s Confidence Code requirement for PCWs to provide coverage of the whole market appears likely to become impractical as the number of tariffs offered increases and PCWs agree different tariff levels and commissions with energy suppliers. Should this element of the Confidence Code be removed, therefore, as part of this remedy? If so, are alternative measures to increase confidence in PCWs required? For example, in order to maintain transparency and trust, should PCWs be required to provide information to customers on the suppliers with which they have agreements and those with which they do not?

In our previous submissions we have shown that the WOM obligation;

- Creates a hugely powerful incentive for energy suppliers to act in a predatory and / or parasitic manner “freeloading” off of the requirements of the Code to obtain free advertising. Since our last submission the number of energy suppliers adopting this predatory approach has grown significantly.
- Creates an implicit and unlawful cross-subsidy between PCWs and energy suppliers.
- Damages profitability and undermines the ability of PCWs to earn a normal return from energy switching.
- Puts energy suppliers that pay commissions at a commercial disadvantage to those that don’t.
- Hinders development and innovation of services by PCWs.
- Undermines investment in advertising and promotion of services which in turn removes a powerful switching message from the market. Competition is stifled. Dis-engaged and vulnerable customers are disproportionately affected.

- Creates a barrier to effective switching. Non fulfillable tariffs on PCWs need to be fulfilled at the supplier end. Certain suppliers don't even offer online quotes let alone online fulfilment. Switching and competition are hindered.

In addition, in this submission we have shown that Ofgem's approach to online domestic TPIs is diametrically opposed to their approach to non-domestic TPIs. It is inconsistent, grossly prejudicial against domestic PCWs, unfair and quite likely unlawful (Section 4).

This element of the Code is unsustainable and should be removed irrespective of whether the 4 tariff rule stays or goes.

In terms of providing information about commercial agreements, please note Ofgem accredited PCWs are already required to provide information to customers about the suppliers with which they have agreements and those with which they do not. **TheEnergyShop.com** has always been transparent both about its business model and which suppliers it has commercial relationships with. This information has always been posted on our website even when not required by the Code. If you do a Google search on the subject of our commissions it shows in the #1 position in natural search (with uSwitch again bidding up the cost of the top advertising slot).

To maintain trust (and of course security of data) we believe that it is important that all PCWs be clear not just about their commercial arrangements but also where they ship customer data.

Issues with trust can arise in the following situations.

Sites which claim relationships with energy suppliers which they do not, in fact, have. Instead, the customer's data is shipped to third parties for processing. In these cases it needs to be absolutely clear that the customer's data is being recycled (and is co-owned) by many parties before reaching the energy supplier. Use of this data by multiple parties can have a dramatic adverse impact on confidence.

Sites which claim "not for profit" status yet reap in millions in switching commissions. This can be extremely damaging to confidence in the industry.

(d) Rather than removing all limits on tariff numbers and structures, would it be more effective and/or proportionate to increase the number of permitted tariffs/structures? If so, how many should be permitted and which tariff structures should be allowed?

Please see our response at the top of the section.

We are strongly opposed to any changes to tariff structures that increase complexity for consumers.

(i) For example, would requiring domestic energy suppliers to structure all tariffs as a single unit rate in pence per kWh, rather than as a combination of a standing charge and a unit rate, reduce complexity for customers, while avoiding restricting competition between PCWs? Alternatively, would such a restriction on tariff structures have a detrimental impact on innovation in the domestic retail energy markets?

Structuring all tariffs as a single rate in p/kWh would unquestionably reduce complexity for consumers. There is also no reason why such a structure would restrict competition between PCWs.

Remedy 4 – Possible measures to address barriers to switching by domestic customers

Remedy 4a – Measures to address barriers to switching by domestic customers

(a) Will the roll-out of smart meters address the feature of uncertified electricity meters? If not, what additional remedies should we consider to address this feature?

No comment

(b) Will the roll-out of smart meters address the barriers to switching faced by customers with Dynamic Teleswitched (DTS) meters? If not, what additional remedies should we consider to address this feature?

No comment

(c) Should PCWs be given access to the ECOES database (meter point reference numbers) in order to allow them to facilitate the switching process for customers?

Access by PCWs to accurate and reliable MPAN/MPRN data at a reasonable (non-monopolistic) price is essential to facilitate the switch process.

Giving PCWs access to potentially “better” data will allow them to build higher quality services for consumers. Until we see the data we cannot say for sure what benefits it will provide but we are reasonably confident that access to better and cheaper data will deliver positive solutions for consumers (more reliable switching, greater consumer confidence, lower overall prices).

(i) To what extent would this reduce the rate of failed switches and/or erroneous transfers?

This is difficult to answer as PCWs are not in control of failed switches / erroneous transfers. Those processes / decisions rest with energy suppliers. We rely on energy suppliers for reporting of failed switches. The quality and timeliness of this reporting varies significantly across suppliers. Timeliness is a particular issue as it is difficult to deal with failed switches if they are reported 1 or more months after the event. Moving the energy industry onto real time application processing and reporting will reduce failed switches and erroneous transfers significantly. Real time processing is also an essential re-requisite if 1 day switching is to be realised.

(ii) Are there any data protection issues we should consider in this respect?

Clearly this raises data protection issues. We would expect that all parties accessing this data would be audited for compliance with applicable Data Protection standards.

(iii) Will access to this database still be relevant once smart meters have been introduced?

That very much depends upon how smart metering data exchange evolves and who ends up owning and / or getting access to the data. Restrictions on access to customer’s usage and / or meter data will raise the exact same data issues we have today. Access rights to this data should be addressed as part of the Smart Metering programme.

(d) Should there be penalties for firms that fail to switch customers within the mandated period (currently 17 days, next day from 2019)? How should these penalties be administered? At what

level should the penalties be set? Should customers who suffer a delayed or erroneous switch receive the penalty as compensation?

We strongly support the concept of penalties for failure to meet SLAs and as a deterrent of non performance. It will help ensure that **ALL** suppliers, large and particularly small, need to have proper, tested processes and procedures in place before entering the market. Currently it is possible to launch an energy supply business from one's back bedroom and there is little visibility whether the smaller suppliers have transfer processes which are fit for purpose.

Currently we have no firm views on the level or administration of those penalties.

(e) When next-day switching is introduced, will a 'cooling-off' period still be required? Could it be avoided by requiring that no exit fees are charged within two weeks of switching?

As we understand it the "cooling off" period is governed by the Consumer Rights Directive in UK law so cannot easily be dispensed with (for online and distance sales in any case). Notwithstanding that, it is important that energy switchers be given the right to change their mind and cancel their contract within 14 days of purchase, as are their rights with others products and services. Removing this right would significantly reduce confidence in switching.

We believe that the cooling off period should run in line with the actual switch itself just as it does with, for example, car insurance. The customer makes an application, it is either accepted or rejected on a real time basis (there is no need for next-day switching), and the customer then has 14 days in which to change their mind and return to their current supplier.

It is up for discussion as to what happens with respect to billing should the customer decide to cancel their application and stay with their current provider. With car insurance the customer is liable for the days of cover received prior to cancellation. With energy it could be either (1) reverting back to the current supplier's tariff as if nothing had happened or (2) being billed by the new supplier during the actual days on supply. Option 1 would be simpler to implement for everyone involved. The issue of who pays for the difference in price between the units of energy consumed prior to cancellation needs to be considered, but in the majority of cases is likely to be a relatively small amount.

We believe that, in order to realise next-day (or real time switching) the following pre-requisites need to be satisfied;

- Real time application processing
- Real-time access to MPAN/MPRN data
- Real-time access to, and verification of, customers' energy usage, supplier and tariff data.

We do not see the need to move to 1-day switching when the processes required for this are basically identical to those for real-time switching. We would strongly urge the CMA to scratch this interim 1-day step, and require the industry to move straight to real-time switching.

(f) Are specific measures required to facilitate switching for customers living in rented accommodation (either social or private)?

No comment.

In light of the introduction of smart meters, we are considering whether any other remedies may be required to address barriers to switching for domestic customers. For example:

(a) Does the 'Midata' programme, as currently envisaged, provide sufficient access to customer data by PCWs to facilitate ongoing engagement in the market? Should PCWs – with customer permission – be able to access consumer data at a later date to provide an updated view on the potential savings available?

It is vital that third parties, with a customer's permission, are permitted access to Midata on a schedule determined by the customer. The success of Midata (as well as QR codes) is currently being undermined by data issues. Please see our comments in Section 3 and responses to Remedy 3.

(b) Do customers need more or better information or guidance on how their new smart meters will work?

Almost certainly.

Remedy 5 – Requirement that energy firms prioritise the roll-out of smart meters to domestic customers who currently have a prepayment meter

No comment.

Remedy 6 – Ofgem to provide an independent price comparison service for domestic (and microbusiness) customers

SUMMARY

We support the creation of an independent Ofgem comparison service with WOM coverage. Our support is qualified in that it is based on the service satisfying the conditions set out below.

- It must be wholly operated and managed by Ofgem with respect to tariff data collection, processing and presentation. It cannot be out-sourced to another PCW whether accredited or not.
- It should be non transactional.
- It should provide a list of accredited PCWs (not energy suppliers) where the customer can go to verify and fulfil the transaction (as per the current goenergys shopping.co.uk site).
- It should be transitional in nature over a 2-4 year period while the retail energy industry transitions through the post-CMA, 1-day / real time switching, smart meter roll-out world.
- It should start with domestic markets and roll out quickly to SME markets.

We believe an Ofgem PCW would have valuable additional benefits which go well beyond those contemplated by the CMA. These are;

1. Providing a back stop to WOM comparisons while this restriction is removed from domestic accredited PCWs.
2. Encouraging consumers to use more than one PCW by providing a full list of accredited PCWs from which a customer can choose.
3. Resolving tariff data consistency issues (as described in Section 3 and Remedy 3) and imposing standard tariff data formats on suppliers. It potentially overcomes the data issues that currently hinder switching and undermine the Midata and QR code initiatives.
4. Mandating and facilitating a move towards electronic tariff data transfer between Ofgem, suppliers and PCWs using WebServices. This removes the pointless duplication of tariff processing across PCWs, reduces costs and speeds up product innovation. PCWs can focus on innovation and product development rather than duplicated and wasteful effort. Energy suppliers would need to become more efficient leading to lower costs. Competition is enhanced, product innovation is enhanced, costs and therefore prices for consumers fall.
5. Encourages PCWs to sign up to the Confidence Code.

6. Allows smaller PCWs and new PCW entrants to get some distribution in a market currently sown up by the Big 3. Increases competition amongst PCWs and may have some impact in reducing the market dominance / power of the Big 3 PCWs.
7. Provides Ofgem a real-time hands-on insight into some real issues within the industry; for example how energy suppliers game comparison sites, mis-represent tariffs, crowd our results etc. Ofgem's current detached analytical approach to retail markets has in the past led to some incorrect assessments of market developments.
8. Could also be used to facilitate the move to a centralised switching platform between PCW / supplier in preparation for next-day / real time switching.

HOW IT MIGHT WORK?

To achieve the benefits listed above it would be an essential requirement that Ofgem was **fully responsible** for the direct receipt, processing, publishing and maintenance of tariff and product information. Critically, this would mean that Ofgem would need to handle all the parts of the value chain in house (aside from maybe the design and build of the actual website). Ofgem should not be able to outsource any part of the data collection, processing or maintenance components for 2 key reasons.

1. Outsourcing the service, for example to an existing PCW, would undermine the basic rationale of offering an independent Ofgem service. If the service exists to create trust in "untrusted" PCWs then using an already "untrusted" PCW to do the job not only defeats the fundamental purpose of the exercise but would also be extremely damaging to consumer confidence when it hit the press (as it inevitably would).
2. Outsourcing the service would not generate benefits 3, 4 and 7 outlined above. We believe these are critical issues to ensure an efficient and truly competitive market develops for consumers.

We would envisage that the PCW would operate as a separate dedicated unit within Ofgem responsible for gathering, processing, uploading, verifying and maintaining tariff data. This would include direct contact with energy suppliers as required.

The unit would also be responsible related projects; data consistency issues across the industry, requirement on suppliers to offer data electronically via Webservices etc.

The unit would then feed tariff data to other parts Ofgem for market analysis and fulfilling its other regulatory duties.

We believe that in order to get the service up and running quickly and at least cost, Ofgem would need to hire an experienced, competent individual from an efficient end of the price comparison service (for example flight search firms such as skyscanner).

(a) Would this remedy be effective in increasing customers' trust in PCWs and thereby encourage engagement in the markets and switching?

This remedy would certainly be effective in increasing customers' trust in comparisons if it had official implied government endorsement (which it would have). To the extent that Ofgem then fed those customer enquiries onto accredited sites, this would add legitimacy to the accredited sites. So yes we strongly believe that it would encourage engagement in the markets and in switching.

This initiative could backfire spectacularly if it transpired that Ofgem was only providing the service taking a feed from an "untrusted" source (for example another PCW).

(b) Should this service be online-only, or should it also operate over the telephone for those customers without access to the internet?

In an ideal world it would be provided online and over the telephone so as to capture the widest possible audience.

The problem with providing the service over the telephone is that Ofgem **does not have any** accredited PCWs to which to direct customer enquiries. Although certain PCWs do operate telephone based services it is important to note that these telephone services are **NOT** accredited. That means they are not audited, nor are they required to be accurate, independent or impartial. Many PCWs will claim that they follow the Code rules over the telephone, but the point is there is no guarantee that they do. In fact a highly publicised report in February 2015 found that price comparison sites hid the best energy deals from their phone customers because they didn't earn a commission from them. That report was part of a House of Commons Select investigation of price comparison websites where wrong-doing was admitted.

There have been many calls for Ofgem, and its Code predecessor Consumer Focus to create a Code for telephone based PCWs in order to clean up this potentially shady part of the market. For inexplicable reasons Ofgem still does not see this as a priority.

Feeding enquiries to unregulated telephone based PCWs risks creating significant damage to consumer trust in the event that even a single PCW is uncovered to be mis-selling on even a single occasion. Therefore until such time as a parallel Code is up and running for telephone based PCWs, then this must be avoided.

Ofgem should therefore initially launch the service as online only. This would make the service extremely quick and cheap to launch and service.

(c) Is there a risk that such an independent service could undermine the development of other PCWs in the energy sector? How could this risk be mitigated?

Such a service would increase confidence amongst users, and most likely particularly increase confidence amongst disengaged users. On balance, the initiative would grow the overall switching market.

The service would undermine the PCW market if it ended up feeding customer enquiries directly to energy suppliers. The current WOM obligation on accredited PCWs means many energy suppliers

abuse the Code to drain free leads from PCWs. If this was replicated with the Ofgem PCW then not only would it undermine the development of other PCWs but would probably kill off a few of the existing ones as well. So leads cannot to be to energy suppliers directly if this risk is to be mitigated.

If the service was used to feed enquiries to a list of accredited sites it would have a number of very positive implications for competition and development of the PCW market.

It would distribute enquiries more broadly across PCWs and encourage consumers to use a number of different sites.

It would redistribute some traffic from the larger sites that currently dominate the market and give new entrants access to distribution. Larger branded sites would still benefit disproportionately from the service due to brand power. However if smaller sites were given an opportunity to compete more fairly for customers, it would create a strong incentive for them to differentiate their product / service as well as to invest in branding, all of which would stimulate growth in the overall market.

(d) Should the Ofgem website quote the energy suppliers' list prices only? Or should it seek to provide full details of all quotes available on the market (including on other PCWs), ie function as a meta-PCW?

We are open-minded on this one. We can see the pros and cons of each and would be happy to discuss issues and implications.

(e) How could we ensure that an Ofgem price comparison service was robust in terms of offering all tariffs available on the market? Should there be an obligation on retail energy suppliers and/or PCWs to provide information to Ofgem on their tariffs?

As the energy supplier is the originator of the product, then data should come from the supplier.

Getting hold of the data will be a trivial formality for Ofgem who would operate as if it had signed up to its own Confidence Code.

The current Confidence Code states that;

“A Service Provider is responsible for obtaining, updating and ensuring the accuracy of all data displayed on its Price Comparison Service covering all licensed supplier tariffs (including those of its agents, affiliates and any associated brands).”

The Code is not prescriptive in how the data is obtained, updated or checked provided that each PCW maintains its own database. Under the current Code, this requires that each PCW has to invest in a tariff database which is then pointlessly duplicated by every other accredited PCW.

As PCWs are obligated to show WOM comparisons they have no control or leverage over the format or quality in which the source data is received. Energy suppliers have no incentive in investing in efficient data transfer processes knowing full well that whatever they send to a PCW, it is the PCWs responsibility to get it up onto their site within very tight timescales. The end result is a grossly inefficient transfer of inconsistent data that leads to inefficiency, excess cost, and creates barriers to

both switching by confusing consumers (inconsistent tariff names) and hindering the development of initiatives like Midata and QR codes on energy bills.

Ofgem doesn't care how any of this happens; just that it does. Ofgem has also taken a surprisingly indifferent approach to issues like data consistency despite the drag it has on efficiency and on competition.

However, despite the difficulties, if the existing accredited PCWs sites can manage to cope (at least for now) then it will be an absolutely trivial exercise for Ofgem to obtain this information directly from the energy suppliers. Furthermore, given Ofgem's power balance with energy suppliers, Ofgem will be in a unique position not only to source the data but to address data consistency, and to finally mandate a move towards electronic tariff data transfer between Ofgem, suppliers and PCWs using WebServices. This is something that the PCW industry as a whole has been unable to deliver in over 10 years and still no signs of being able to deliver without an intervention either from Ofgem, the CMA or both.

So for Ofgem this will be a trivial exercise but the critical point here is that Ofgem must be required to handle all aspects of data capture, processing, loading, verification and presentation in order to deliver the objective of an independent service.

(f) Should any price comparison service operated by Ofgem be transactional, ie be able to carry out switches for consumers, or should it provide information only?

There are both benefits and costs to offering a transactional service.

The key benefit of a transactional service is that, once built, the marginal processing costs are very low meaning that energy suppliers using this route to market for customer acquisition might benefit from lower acquisition costs. We say might because there are still marketing and development costs that would need to be funded, and once these are priced into the overall cost of the service the cost per transaction may not necessarily be much lower than the commission energy suppliers pay to PCWs (where they pay them).

Offsetting this, are several disadvantages of a transactional service.

A transactional service will be considerably more expensive to build than an informational service and would take far longer to get to market.

A transactional service would definitely undermine and potentially kill off energy PCWs. It would also deter new entrants.

Building a transactional service based on the current batch processing model would have a maximum shelf life of 24 months. The move to 1-day switching by 2018 will require a move towards real time transactional processing meaning that the transactional part of the service would need to be re-built (and the pre-existing investment written off).

We do not believe the service should be transactional on grounds of cost, time to market, potentially wasted development costs and the negative impact it would have on investment in PCW services. Given developments in energy retail markets over the next few years including smart metering, Midata, QR codes, the Internet of Things and such like we see a strong case for encouraging investment in the PCW market in order to stimulate the development of innovative products and services around these market developments. Deterring investment in new services does not seem a good idea at this point.

If the CMA believes that the site should ultimately be transactional then we would strongly recommend that this is not the launch platform as it will significantly delay time to market. An initial (online only) price comparison service feeding out enquiries to accredited PCWs for fulfilment could be easily deployed and live within 3 months. A transactional service could take significantly longer.

Furthermore, if the CMA decides that the service should ultimately be transactional we would appreciate a definitive statement of intent in order that we, and other industry players, can adjust our investment programs accordingly.

(g) What would be the likely costs to Ofgem of offering this type of price comparison service? Would Ofgem need additional funding and/or statutory powers in order to provide this type of service? If so, where should this funding come from?

The main argument we've seen presented by those opposing the creation of an Ofgem PCW is on the grounds of cost. Specifically that it would be incredibly expensive to build, to operate and to market the service. There may be legitimate reasons for opposing an Ofgem PCW but cost is definitely not one of them.

There are 3 main elements to the set-up costs of a comparison platform.

1. Building the platform (investment stage)

- This could be with or without transactional capabilities although time to market and costs would be significantly reduced if the service was non-transactional.

2. Ongoing operating costs

- Tariff collection, processing, validation and publication.
- Optionally call centre services.

2.1 Data Processing

Costs will vary depending upon how manual the data processing part of the exercise is. Ofgem could require that suppliers send pricing data through data-feeds; in this case processing costs would fall to zero.

2.2 Call centres

If the service was offered over the telephone it would first require that Ofgem created a Code for telephone based PCWs and then go through the accreditation process. Even if Ofgem fast tracked the process it would unlikely be ready in less than 12 months.

Offering comparisons over the telephone would clearly add to costs, but Ofgem could easily make use of shared resources with other organisations to keep these low (for example with the Citizens Advice Bureau).

3. Marketing Costs

The ongoing costs of promoting the service to users. We will address this separately below.

Before presenting our estimate of the overall costs of the service we would first like to address, and hopefully dismiss, some of the arguments claiming the service shouldn't be offered on the grounds of cost.

Moneysupermarket

In its submission dated 29 September 2015 moneysupermarket stated

“Operating a price comparison service is complex and costly. Last year we invested £16.5M in the continued development of our site.”

This is a rather vague and somewhat meaningless statement which seems to infer that just the development of an Ofgem PCW would be a multi-million project. This comment is of course disingenuous and we are surprised the Moneysupermarket would choose to make it.

We are not suggesting that Moneysupermarket do not make substantial investments in their technology platform. Indeed from their 2014 accounts we read:

“The Company capitalised £16.1m in 2014 (2013: £4.1m) investing in platforms that will enable the Company to more readily deploy changes to its website and replace some of the legacy technology that exists today. This will increase flexibility and lower the costs of ownership and builds upon the investments made in previous years which improved the Company’s data acquisition capabilities.”

The £16.1 million was, of course, the investment across the group and not just the energy platform which represents a small part of Moneysupermarket's overall business. Furthermore this was a fourfold increase on the previous year so hardly represents a normal investment level. It also seems to have been largely spent on technology which will just not be required by an Ofgem PCW.

MoneySavingExpert.com

MoneySavingExpert also criticises the suggestion on cost grounds

“...potentially expensive suggestion that Ofgem establish and run a comparison site. This would be a waste of public money...”

Aside from that comment they provide no backing evidence of any kind. Indeed it should be noted that not only is MoneySavingExpert.com not accredited, it does not actually operate its own comparison site for energy so probably would have little insight into the costs involved.

uSwitch

uswitch did not provide any cost estimates in its public response to this question. However, we can learn a lot about the value of uswitch's technology platform from the shareholder circular sent to Zoopla shareholders on 30 April 2015, ahead of the Proposed acquisition of Ulysses Enterprises Limited (uSwitch Group)

"Website and technology platform

£3.7m has been recognised with respect to the Group's website and supporting technology platforms. The fair value has been obtained by estimating the cost of independently building a similar website and supporting platforms."

So £3.7m is the estimated current cost to build a similar website and supporting platforms to the market leader.

However, it needs to be noted that uSwitch is not just an energy switching site. It also operates the largest Communications (Broadband / mobile) switching platform in the UK and has financial services offerings across a range of money and insurance markets. It therefore seems reasonable to attribute say 50% of the £3.7m to the energy website and platform - £1.85m.

In comparison to uSwitch, Ofgem would not need to build a similar website and supporting platform. Ofgem's platform does not need to be transactional, it does not need to integrate with 1,000's of affiliates, it does not need 1,000's of pages of content for SEO purposes and it does need sophisticated tracking and monitoring software.

Ofgem's costs of developing an informational PCW would be a very, very small fraction of this £1.85m. Perhaps 10%; maximum 20%.

Energyhelpline

In written evidence sent to the House of Commons Select Committee on Energy in February 2015, Mark Todd co-founder of energyhelpline writes

"When Jay Manek and I founded the company in 2002 we worked for about 48 hours in a stretch with barely any sleep over one week end to get a fully up to date tariff database that covered the whole market. It was 7,000 rows down by 100 columns across. Now our energyhelpline database contains over 80,000 rows and we have a dedicated team of experts who are constantly updating and testing the tariff database. This is a considerable undertaking."

It we extrapolate this statement we get:

Time to develop a 7,000 row database;
 $2 * 48 \text{ hours} = 96 \text{ hours} = 12 \text{ man days.}$

Gross that up to 80,000 rows.
 $80,000 / 7,000 * 12 \text{ man days} = 137 \text{ man days.}$

Contingency – double it to allow for over-runs = 274 man days.

This is equivalent to 13 man months, or 3.25 months for a 4 person team.

This is getting closer to the timeframe and cost involved.

Build Costs - Overall Assessment

An initial (online only) informational PCW feeding out enquiries to accredited PCWs for fulfilment could be easily deployed and live in 3-6 months at minimal cost. Ofgem has detailed and extensive experience of monitoring PCWs (they audit all accredited PCWs pretty much constantly) so designing a PCW service should be a trivial exercise.

Extending the platform to provide transactional services would add significantly to this. A transactional service is not recommended as it could delay the project materially and the build would in any case be redundant within 24 months as we move to 1-day switching.

(h) How should customers be made aware of the existence of this service? Should information be provided by energy suppliers on bills/during telephone calls? Should PCWs be required to provide links to the Ofgem website during the search process to allow customers to cross-check prices?

Marketing any service can be potentially expensive but doesn't need to be.

Most of the existing PCWs criticise this remedy on the grounds that marketing would be expensive and ineffective, often using the Money Advice Service as an example of how not to do things.

Rather, surprisingly those same sites recommend that the money is better spent by government promoting switching and price comparison websites, citing the success of the 'Go Energy Shopping Campaign'.

Moneysupermarket

"We would encourage DECC to consider funding further publicity campaigns to help stimulate the market. The DECC funded 'Go Energy Shopping' campaign in February 2015 had significant impact on consumer engagement and switching levels. During the first week of this campaign Moneysupermarket.com saw a 55% uplift in visitors to the energy channel compared to the same period the year before."

Clearly these arguments are conflicted.

MoneySavingExpert.com even makes this conflicted argument of spending government money (because it is good) and not spending government money (because it would be wasted) in the same paragraph.

The lessons here would seem to be to avoid the mistakes (such as the Money Advice Service – we are not familiar with the issues here so only repeat what others have said) and to build on the successes (Go energy shopping).

There are a number of easy and very inexpensive ways in which the service could be promoted.

Replacing the Citizen's Advice phone number on energy bills / statements with the Ofgem PCW web address.

Putting a link to the Ofgem PCW in a prominent position on all energy supplier websites so that customers on a supplier's website can validate the quote and saving with an independent source.

If funding was available then replicating the success of the first Go Energy Shopping campaign would be the obvious route to take (as also recommended by all other PCWs).

(i) Is there any additional information that Ofgem should provide on its website relating to energy suppliers and/or tariffs to facilitate the customer search and switching process?

If the aim of the remedy is to increase customers' trust in the services offered by PCWs, encouraging engagement and switching and, to act as a backstop for all of market comparisons in the event that WOM becomes even more untenable for PCWs, then focussing on a core offering of providing a WOM market comparison with a list of accredited PCWs where the transaction can be fulfilled will serve that purpose. There is no need to over complicate things at this stage as it will merely delays implementation. The situation can be reviewed once the service is up and running.

Remedy 7 – Measures to reduce actual and perceived barriers to accessing and assessing information in the SME retail energy markets

Remedy 7a – Introduction of a new requirement in the licences of retail energy suppliers to provide price lists for microbusinesses on their own websites and to make this information available to PCWs.

(a) Would this remedy be effective in increasing price transparency for microbusiness gas and electricity tariffs? Would it serve to make comparisons between different suppliers easier, either directly or by encouraging the development of PCW services for microbusinesses? If not, are there other measures that would encourage this development either as an alternative to this remedy or in conjunction with it?

The lack of transparency in the business energy markets appears to be one of the key reasons why business customers suffer so badly at the expense of energy suppliers and TPIs. The CMAs Summary of Provisional Findings report showed that supplier margins in the SME market were 167% higher than those in the domestic markets (which arguably are also considered to be too high). It seems staggering that a market operating largely through TPIs could offer such poor results for consumers.

This remedy would certainly be effective in increasing price transparency for microbusiness gas and electricity tariffs provided that the tariff information was presented in an easily understandable and consistent manner across all suppliers and TPIs.

The issue at the heart of this is why transparent online price comparison services have not developed to date? The benefits of open and transparent price comparison services for consumers in terms of reducing search costs and promoting competition amongst providers are well documented. It has now been almost 20 years since commercial energy markets were deregulated. Online PCWs in the domestic market have been operating for over 15 years. Yet energy suppliers and TPIs still trade almost invariably over the telephone. The question is why TPIs are not already operating in a transparent way online.

Appendix 2 shows screens shots for a number of the larger business energy TPIs. None offer transparent online quote tools; all drive consumers into their call centres. We can understand why this would work for the TPI. A lack of transparency allows the TPI to sell inflated tariffs at high margins with limited competition. TPIs clearly have a vested interest in keeping this market from developing in an open and transparent way. Certain broker aggregators even operate models that allow salespeople to earn “unlimited” commissions. Unlimited commissions for sales agents are only possible if 2 conditions are met;

- The base cost of the tariff is loaded with the “unlimited commission” and
- There is a general lack of transparency preventing the consumer from being able to verify the value of the offer.

From the CMA findings we also know that this arrangement works for energy suppliers allowing them to earn excessive margins.

Selling and servicing over the telephone is considerably more expensive than processing transactions online. Operating a transparent online quote and fulfilment platform would potentially reduce TPI costs quite considerably. A TPI operating such a service would be able to offer cheaper prices to consumers; they would potentially also be able to build reputation and distribution around this proposition.

Offering an online service cannot be difficult. Each of the services shown in Appendix 2 must already have an internal pricing system to provide quotes for consumers. It is a relative formality to make such a system available online. Indeed 3 of the services, makeitcheaper, uswitch and energyhelpline already operate their own domestic PCWs.

This market has clearly not evolved in the natural way that markets normally do. Certain factors have restricted the development of transparent online services to the detriment of consumers. We would therefore ask the CMA to investigate whether there have been agreements or concerted practices between energy suppliers and / TPIs which have had as their object or effect the prevention, restriction or distortion of competition.

(b) Do microbusinesses have sufficient access to the information they need (for example on their meter types) in order to engage effectively in the search and switching process?

No comment.

(c) How long should energy suppliers be given to provide the required information?

The required information is already in the possession of suppliers so we see no reason why it should not be made available with immediate effect. Tariff rate cards could initially be published as PDFs if necessary so as not to delay the process. Even energy suppliers without a website could have the information live on the Amazon Cloud in about 30 minutes.

The process of agreeing standard formats for data presentation / sharing and for making the information available online in a more interactive and usable format (machine readable data for example) will take some development time but could easily be delivered within a 3-6 month window.

(d) Should energy suppliers be permitted to fulfil this requirement by providing an automated quoting service on their websites (where microbusinesses can put in their details in order to obtain quotes) rather than a list of prices?

An automated quoting service should be offered in parallel with the open publication of rates and meter information. It is important to note that even with an automated quoting service much information can still be hidden behind a headline price. Therefore it is important that both options are made available to businesses in order that they can obtain the quote and then have all the backing data to be able to verify it either directly or through a third party service.

The open publication of rates is also likely to incentivise the development of new comparison services for consumers.

Remedy 7b – Introduction of rules governing the information that TPIs are required to provide to microbusiness customers

We note that Ofgem has also identified this issue and has considered introducing a code of conduct for TPIs to address these concerns. Ofgem’s draft code of conduct for TPIs sets out a number of requirements designed to improve the behaviour of TPIs and thereby increase trust and engagement in the market on the part of microbusinesses. We consider that this code of conduct would have a positive effect on TPI behaviour but our current view is that more stringent disclosure requirements may be required in relation to incentives.

(a) Would this remedy be effective in improving transparency over incentives and trust in TPIs in the energy sector? How could the CMA ensure that this remedy was enforced, ie that TPIs were providing the specified information?

We are pleased that the CMA has high-lighted that the proposed Ofgem Code for non-domestic TPIs is **not stringent enough** in certain respects. We would contrast this with the CMA’s comments about the Code for Online Domestic PCWs which the CMA described as “**particularly stringent**” with respect to certain elements.

We feel that this is putting it rather lightly. As our analysis in Section 4 shows, Ofgem’s Draft Code of Conduct for non-domestic TPIs (NDTPI) does not remotely go far enough in all areas, not just in disclosure requirements.

- Ofgem does not require NDTPI to be independent or impartial.
- Ofgem does not require NDTPI to offer any comparisons let alone WOM comparisons.
- Ofgem does not impose any deadlines for updating tariff information.
- Ofgem does not impose requirements on NDTPI that require them to manage their own calculator and website.
- There are no requirements about how Personal Projections should be calculated (which is a good thing).
- There is no mention that Ofgem will audit compliance either on an annual or ad hoc basis.

To us it appears that this Code was written by the industry, for industry in order that the industry can continue to earn excessive returns at the expense of consumers.

Our analysis of the differences between the domestic online PCW Code and non-domestic TPI code is shown in Section 4. It demonstrates the dis-jointed, inconsistent and grossly prejudicial approach Ofgem has taken against domestic PCWs. It questions not just Ofgem’s competence but also its integrity in this matter.

We believe that **ALL** obligations on TPIs in domestic and non-domestic markets should be aligned through a combination of relaxed requirements on domestic TPIs and through a significant tightening of requirements on non-domestic TPIs.

(b) What information should be provided by TPIs to microbusinesses in order to enable them to make informed choices?

- Transparent Whole of Market comparisons (for as long as WOM also applies to domestic TPIs).
- Full tariff information.
- Full disclosure of commercial relationships and commission levels (including where the TPI uses a third party for switch fulfilment).

(c) Could the provision of certain types of information have unintended consequences (eg customers choosing tariffs based on commission rates rather than total price)? If so, are there any steps that could be taken to mitigate this effect?

We believe that business owners are generally rational individuals and would opt for the best / cheapest option overall all (with commission included) provided that it was fully transparent and clearly explained. However, given that this sector of the market almost invariably operates over the telephone then the real risk remains that customers are pressured into buying product inappropriate for them.

This risk could be mitigated by means of an Ofgem PCW which would list base tariffs without the commission included. Business customers would easily be able to understand their base cost and then compare TPIs based on the basis of commission charged and serviced offered. TPIs would need to compete on price and service. The non-domestic TPI model would no longer be just about trying to get the fattest margin out of the client.

(d) Should the specified information be provided to customers in writing or orally (or both)? At what stage in the sales process should this information be provided?

If the sale is conducted over the phone, then in writing

If the sale is conducted online, then it should be published on the supplier / TPI website during the quote and apply process and should be emailed to the customer once accepted.

(e) Should this remedy be introduced in addition to Ofgem's proposed code of conduct? Or should only this remedy (or only Ofgem's code of conduct) be introduced?

As per our previous comments in Section 4 and answers to responses in this section, Ofgem proposed Code of Conduct for non-domestic TPIs is frighteningly short on requirements and will do little to change behaviour in this market.

All remedies introduced here must therefore be additional to Ofgem's minimalist approach in this sector of the market

(f) Are there any additional measures that should be implemented alongside this remedy to enhance its effectiveness?

The non-domestic market has clearly not evolved in the natural way. TPIs and energy suppliers all have a vested interest in operating in a non-transparent way with the result that energy consumers have suffered from excess energy costs over a prolonged period.

We believe the CMA should launch an investigation into to whether there have been agreements or concerted practise between energy suppliers and / TPIs which have had as their object or effect the prevention, restriction or distortion of competition in breach of UK and EU Competition Law.

We would also ask that the CMA conduct an audit into Ofgem's performance with respect to the totally divergent approaches it has taken with regards to regulation of TPIs in the online domestic sector and the non-domestic sectors.

Remedy 8 – Introduction of a new requirement into the licences of retail energy suppliers that prohibits the inclusion of terms that permit the auto-rollover of microbusiness customers on to new contracts with a narrow window for switching supplier and/or tariff

(a) Would this remedy be effective in allowing microbusiness customers greater opportunity to engage (by removing the narrow window in which they can choose not to roll-over automatically)?

Yes. This provides greater options and the more options customers have to engage, the greater the likelihood that they will do so.

(b) Are there any means by which energy suppliers could circumvent this remedy to continue to lock customers into energy tariffs that they have not chosen for extended periods of time?

The most obvious approach will be the situation analogous to that in the domestic energy markets where the out of contract business user is rolled onto an over-priced SVT, without their knowledge.

(c) What is the minimum or maximum notice period that customers should be required/allowed to give in order to exit a contract that they have been rolled on to?

Minimum - 1 month

Maximum - 3 months

(d) Should energy suppliers be required to inform customers that they are nearing the end of their contract and prompt them to switch?

Absolutely. We see no reasons why this sector of the market should continue to be treated so poorly compared to domestic energy users.

84. We have provisionally found that there are relatively high levels of dis-engagement among both domestic and microbusiness energy customers. Therefore, in addition to the remedies set out above, we are considering whether there are any additional measures that might be required to facilitate the process of accessing and assessing information in the industry. We invite submissions on whether energy suppliers should be providing their customers with more, less or different information in order to best encourage engagement. For example:

Remedy 9 – Measures to provide either domestic and/or microbusiness customers with different or additional information to reduce actual or perceived barriers to accessing and assessing information

(a) Does the current format and content of energy bills facilitate engagement by customers? Is there additional information that should be included on bills? Should the quantity of information on bills be reduced to enhance clarity?

Energy bills are, in our view, an ever evolving way by which energy suppliers can confuse consumers by hiding the extremely limited amount of data consumers really need to be able to engage with our comparison website (www.TheEnergyShop.com). I will focus on our own site as it shows what is possible if confusion, jargon and unnecessary and intrusive excess data capture is stripped from the comparison process.

To get a WOM quote at www.TheEnergyShop.com a customer only needs the following information.

- Postcode (and optionally house name / number)
- Name of current supplier
- Current payment method
- Name of current tariff
- Energy usage (kWh / spend / estimate)

What hinders this extremely simple comparison process is predominantly the customer's current tariff and their usage data.

The issue of data consistency has been discussed in Section 3.

Activities of suppliers that act to confuse tariff names and comparisons are discussed in Remedy 3.

Bills are unnecessarily complicated by confusing and essentially meaningless concepts like the TCR and Personal Projection both of which impose a significant cost on the industry and on consumers and really need to be abolished.

With respect to the switch fulfilment process it is also necessary that the customer has access to their MPAN / MPRN data if not available industry databases (in around 5-10% of cases). This information is often buried in the small print.

We believe that each bill should have simple 1 page summary containing the 5 key inputs mentioned above + MPAN / MPRN details. All supporting data can then be appended to this summary.

(b) When customers seek to switch tariffs, are they given enough/too much information on the terms and conditions of their new contract?

Far too much information is now being provided.

We have noticed a growing tendency amongst energy suppliers to load caveat upon caveat onto basic tariff details in order to ensure they do not fall foul of regulatory requirements. Many of these information requirements are frankly overwhelming for consumers. Some, like the Personal Projection are not just flawed but risk creating real damage to consumers' decision making and also destroying confidence in PCWs. We cannot blame the energy suppliers for acting in the way they do. Many of Ofgem's requirements are frankly incomprehensible. Ofgem also operates a regime that offers little guidance up front and retrospective enforcement (often years after the event) which has led the industry to shift to a risk-off compliance driven model when it comes to energy selling.

The TCR was a well intended but ultimately meaningless concept. It is confusing to consumers and has added material cost to the industry. It doesn't have universal application (for example for Economy 7 tariffs) and will have virtually no application in a world of customised smart meter tariffs. It is both confusing and incorrect to quote TCRs on a PCW. TCRs are based on an average usage profile whereas customers use PCWs to get customised quotes. It is insane to mix the two.

The same applies to quoting an estimated annual bill based on average consumption profiles within a TIL, whether on a PCW or on an annual statement. Having calculated the cost of the new bill for a consumer what possible value can there be in then putting in the average bill in the TIL make? It is nonsense.

Most worrying of all is the use of the Personal Projection to calculate a customer's current tariff.

In February 2015 our research showed that PCWs using Ofgem's inflated Personal Projection methodology were quoting savings that were between £133 and £196 greater than the customer would actually achieve from switching. We sent our report, amongst others to the CMA and to the CEO and Chairman of Ofgem.

On 27 February 2015 we received a reply from Ofgem CEO Dermot Nolan dismissing our research findings. His reply was inaccurate in substantially all material respects.

On 24 July 2015 we again wrote to the CEO of Ofgem showing that the Personal Projection methodology;

- Uses flawed assumptions which are not required.

- Uses a calculation approach which, even if it was valid is, in any case, inaccurate as it does not take into account seasonality.
- Systematically overstates the potential savings from switching, often by significant amounts.
- Creates savings calculations which are purely fictional and are never realised as cash savings for consumers (except in the very rare case where the customer's current tariff and the SVT are identical).
- Leads to inconsistent results between PCWs and between PCWs and energy suppliers.
- Creates a different calculated result on a daily basis
- Is potentially mis-leading, creates real consumer harm and damage, and could give rise to mis-selling claims.
- Affects significant numbers of consumers.
- Is incomprehensible to over 80% of consumers. As such it has absolutely no prospect of success.

In our letter we proposed an alternative approach which :

- Was mathematically robust and accurate.
- Returns results which are realised as real cash costs and savings for consumers.
- Create identical results across different media
- Does not have any inherent bias.
- Was intuitive and easy to understand for the majority of the adult population (Entry Level 3 numeracy and above minimum).

Ofgem, as usual, ignored every last bit of the evidence we presented to them.

We will publish all these documents shortly, so the CMA can take them into consideration as required.

We strongly urge the CMA to require Ofgem to drop the TCR and to ban the use of the Personal Projection methodology for calculating current bills. Ofgem's tinkering and micro-management of the Code also needs to be addressed. It stifles innovation and leads to mis-leading outcomes for consumers.

(c) Should customers be prompted to read their meters (quarterly or annually), either by information on their bill or by a phone call from their energy supplier? Would this increase engagement by improving the accuracy of billing?

Prior to the full implementation of smart meters, that seems like a perfectly sensible suggestion.

(d) Once customers reach the end of a contract period, should subsequent bills highlight that they have now been moved onto the standard variable tariff and/or other default tariff and encourage them to check whether they are on the most appropriate tariff for them?

Absolutely. This would also be an ideal opportunity to promote Ofgem's new PCW service as a way to get an indication of the potential savings available from switching and to direct consumers towards the online price comparison services of accredited websites.

Notes;

Energy suppliers could source the headline comparative data via an API from the Ofgem PCW.

Comparison should include **only Fixed tariffs with at least 14 months to expiry** (minimum 12 month fix plus 2 month communication / switching lead time). This is to prevent gaming of the system by suppliers using either cheap short term variable tariffs or short term fixed tariffs in bait and switch strategies. Furthermore, quoting annualised costs or savings for a short-term tariff would be knowingly inaccurate and therefore mis-leading.

(b) How should prompts be communicated to customers? For example, there is some evidence from the financial sector that text prompts are particularly effective at raising awareness in terms of overdrafts etc.

A combination of media should be tested including letter, email and text messaging.

(c) What should be the timing and frequency of prompts in order to balance effectiveness in terms of encouraging engagement with the cost and potential irritation that might arise from repeated prompts?

The letter / communication should be sent out each quarter in the first year in which the customer moves to a default tariff, and 6 months thereafter.

(d) Who should provide the prompts: customers' energy suppliers, Ofgem or another party?

Energy suppliers are best placed to facilitate this and probably at very low cost. There is however a material risk that energy suppliers could frustrate or delay the implementation of such an initiative as it runs counter to their financial interests. Messages from a third party like DECC or Ofgem would probably have greater credibility with consumers and deliver stronger response rates. We suggest that DECC organise and launch the initiative so as not delay its implementation and to test response rates. If appropriate, execution can then be passed back to energy suppliers if warranted.

(e) Are there particular groups of customers who should receive prompts at specific points? For example, should house-buyers be prompted to engage with the market on completion of their purchase?

No comment

(f) Is there benefit in others in the markets, such as rival energy providers or TPIs, being made aware of which customers remain on default tariffs (or have been rolled on to the safeguard tariff)? In this respect, data protection issues would need to be carefully considered. The ability of other market participants to identify inactive customers, however, has the benefit of potentially encouraging the customer to switch tariffs once out of contract.

Offering this data to rival energy providers or to TPIs runs a material risk of communication overload to consumers and/or a perceived or real risk of spamming. Both of these could have dramatic adverse effects on consumer trust. While it might benefit individual organisations (ourselves included) we would be against it as it would probably be extremely damaging to consumer confidence.

Remedy 11 – A transitional ‘safeguard regulated tariff’ for disengaged domestic and microbusiness customers

We are strongly opposed to a safeguard regulated tariff. Our concern here is that disengaged consumers would become further disengaged if they received rewards (cheaper prices) and lower incentives (lower potential savings) from doing nothing. Furthermore it is likely that already engaged consumers might slide back into dis-engagement if they felt that there was backstop for their lack of engagement (lower cost penalties for not engaging).

We have no comments on the other questions in this Remedy.

Remedy 15 – More effective assessment of trade-offs between policy objectives and communication of impact of policies on prices and bills

TheEnergyShop.com is a leading commentator on energy bills in the national media. We are regularly asked for commentary and analysis on the impact of regulatory and government policies on consumers bills. We often find it difficult to impossible to provide definitive statements based on data provided in reports by Ofgem or DECC, as they lack consistency and rarely provide any supporting data on which claims are based. For example, claims such as... *“this policy will reduce consumers energy bills by £50 compared to where they would have been”* do not provide baseline data, or how the savings is calculated.

What is required is a consistent framework and robust set of transparent baseline data against which policy decisions can be analysed and assessed. We do not feel this is a role for either Ofgem or DECC neither of which are truly independent or unbiased in this respect.

We believe this is a role for a genuinely independent organisation / think-tank. Given the sheer size of the energy industry in the UK and the significant opportunity costs of bad policy decisions (please see our response to Remedy 2) then a case for an independent body is easily justified.

Remedy 16 — Revision of Ofgem’s statutory objectives and duties in order to increase its ability to promote effective competition

AND

Remedy 17 – Introduction of a formal mechanism through which disagreements between DECC and Ofgem over policy decision-making can be addressed transparently

In industries where regulation is deemed necessary, such as energy supply, it is critical that regulators are truly independent organisations, providing a transparent, predictable and consistent regulatory framework. It is also important that regulatory decisions are compliant with law.

In this and previous submissions we have provided examples where decisions are made that are not supported by the evidence, where actions are taken that are grossly inconsistent between related markets and where decisions unfairly prejudice small sectors of the market. There are also multiple cases where Ofgem is aware of market failure over extended periods but does little if anything to act (for example issues with the non domestic TPI sector).

We have no issues with a revision of Ofgem’s statutory duties however we feel that Ofgem needs to be regularly audited, at varying levels within the organisation, to ensure genuine independence, transparency and consistency in its decision making and ensuring that there is some form of independent oversight to ensure it is pursuing the right priorities.

REMEDIES NOT CONSIDERED

141. Second, we considered that requiring suppliers to advertise competitors' tariffs would not provide customers with the correct incentives to engage effectively in the market in the longer term, as they could rely on their supplier to conduct a search on their behalf and provide them with the results. This could encourage customers to remain relatively disengaged in the future, undermining our other remedies to facilitate widespread consumer engagement.

We agree with this point. The objectives would be more easily delivered by a combination of (Remedy 10) better communication to consumers and (Remedy 6) pushing enquiries to an Ofgem PCW and then onto PCWs.

APPENDIX 1 – PPC TERMS AND ADVERTISING COSTS

uSwitch driving up the price of adverts for “energy comparison” to £9.76 per click.

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Energy Comparison - uSwitch.com
[Ad](#) [www.uswitch.com/Energy-Comparison](#) 4.9 ★★★★★ rating for uswitch.com
 Compare Gas & Electricity Prices At uSwitch. Start Saving Today!
 UKs #1 Energy Comparison - Best Comparison Site 2014
 uSwitch.com has 852 followers on Google+
[uSwitch - Dual Fuel Rates](#) [Comparison Tool - uSwitch](#)
[uSwitch Gas & Electricity](#) [uSwitch Exclusive Deal](#)

Energy Comparison - Moneysupermarket.com
[Ad](#) [www.moneysupermarket.com/Energy](#) 0333 123 0420
 4.5 ★★★★★ rating for moneysupermarket.com
 Quick & Easy To Use Energy Comparison. Switch & Save Now!
 Compare All UK Suppliers - Apply Online - Free comparison service
 Compare Prices & Switch - Home Bill Checker - Business Energy Prices

British Gas Energy Deal - Our longest fixed tariff
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 4.1 ★★★★★ rating for britishgas.co.uk
 Fixed Price energy tariff until March'18.
 Free smartphone App - Online account management - £15 Dual Fuel discount
 British Gas has 1,863 followers on Google+
 Fixed Mar 2018 Tariff - Standard Tariff - Fix & Reward Tariff - Fix & Fall Tariff

[Compare Gas & Electricity Suppliers](#) | [CompareTheMarket](#)

Compare Energy - UK Power
[www.ukpower.co.uk/Energy-Comparison](#) 4.7 ★★★★★ rating for ukpower.co.uk
 0800 188 4906
 Leading energy comparison site.
 Awarded 100% for accuracy by OFGEM

Gocompare Energy Prices
[www.gocompare.com/gas-electricity](#) 4.6 ★★★★★ rating for gocompare.com
 Spring Clean Your Energy Bills.
 Switch And Save At Least £291 Here.

Energy Price Comparison
[www.energyhelpline.com/](#) 4.4 ★★★★★ advertiser rating
 Compare all UK energy prices. Save up to £533 a year. Free & Impartial

Energy price comparison
[aspokesmansaid.com/Compare-Energy](#)
 Save grandma £100s on energy bills.
 Friendly and simple to switch today

Compare Energy Prices
[www.theenergyshop.com/](#)
 Save up to £350 on your energy bill
 Compare the whole energy market

Bid Simulator ×

Changes can be made here and applied directly to your keyword. [Learn more](#)

Model and change bid on [energy comparison]

Max. CPC	Impr.	Top impr. ?
<input type="radio"/> £9.76	5,050	4,920
<input type="radio"/> £8.73	4,250	3,930
<input type="radio"/> £6.92	3,590	2,780
<input type="radio"/> £4.79	3,490	1,080
<input type="radio"/> £3.20	2,680	76
<input checked="" type="radio"/> £1.01 (current)	950	--
<input type="radio"/> £0.81	483	--
<input type="radio"/> Use a different bid: £ <input type="text"/>		

Simulation based on performance from 5 Oct 2015 to 11 Oct 2015. These estimates do not guarantee similar results in the future. [Learn more](#)

uSwitch driving up the price of adverts for “energy price comparison” to £7.91 per click.

Bid Simulator
✕

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Model and change bid on “energy price comparison”

Max. CPC	Impr.	Top impr. ?
<input type="radio"/> £7.91	1,040	949
<input type="radio"/> £6.56	881	729
<input type="radio"/> £3.60	823	413
<input type="radio"/> £2.54	737	122
<input type="radio"/> £1.42	449	32
<input checked="" type="radio"/> £0.74 (current)	107	--
<input type="radio"/> £0.55	57	--
<input type="radio"/> Use a different bid: £ <input style="width: 50px;" type="text"/>		

Max. CPC

Simulation based on performance from 5 Oct 2015 to 11 Oct 2015. These estimates do not guarantee similar results in the future. [Learn more](#)

Save
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 Ad moneysupermarket.com/Compare_Energy
 4.5 ★★★★★ rating for moneysupermarket.com
 51% Could Save up to £210 With Us!
 Free comparison service · Apply Online · Switch & Save
 MoneySuperMarket has 1,971 followers on Google+
[Compare Prices & Switch](#) [Switch Energy Supplier](#)
[Electricity Prices](#) [Business Energy Prices](#)

Compare Energy Prices - uSwitch.com
 Ad www.uswitch.com/Compare-Energy-Prices
 4.9 ★★★★★ rating for uswitch.com
 Compare Gas & Electricity Prices At uSwitch. Start Saving Today!
 UKs #1 Energy Comparison · Best Comparison Site 2014
 uSwitch.com has 852 followers on Google+
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Gocompare Energy Prices - Spring Clean Your Energy Bills
 Ad www.gocompare.com/energy-compare
 4.6 ★★★★★ rating for gocompare.com
 Switch And Save At Least £291 Here.
 We Won't Sell Your Data · Save Time & Money · Now With Defaqto
 Gocompare.com has 416 followers on Google+
[Electricity Deals](#) · [Simple Comparison In Mins](#) · [Switch to a Fixed Tariff](#)

Compare Energy Prices
 ukpower.co.uk/Compare-Energy-Prices
 4.7 ★★★★★ rating for ukpower.co.uk
 0800 188 4906
 Compare energy prices from every UK supplier and find the best deal!

npower® Official Site
 www.npower.com/Official-Site
 Great rates, no exit fees.
 Get a quote now!

Compare Gas & Electricity
 aspokesmansaid.com/Compare-Energy
 Save £100s by switching providers
 Compare Best Energy Prices today

Energy Price Comparison
 www.britishgas-business-electricity.com/
 Our lowest electricity quotes,
 call or go online to save!

Compare Energy Prices
 www.energyhelpline.com/compare
 4.4 ★★★★★ advertiser rating
 Save £533 on your gas & electricity
 Free energy price comparison site.

Bid Simulator ×

Changes can be made here and applied directly to your keyword. [Learn more](#)

Model and change bid on "compare energy prices"

Max. CPC	Impr.	Top impr. ^[?]
<input type="radio"/> £7.42	1,320	1,230
<input type="radio"/> £5.32	1,180	860
<input type="radio"/> £4.16	1,170	372
<input type="radio"/> £2.52	971	61
<input type="radio"/> £1.02	469	57
<input checked="" type="radio"/> £0.50 (current)	20	--
<input type="radio"/> £0.45	10	--
<input type="radio"/> Use a different bid: £ <input type="text"/>		

Simulation based on performance from 5 Oct 2015 to 11 Oct 2015. These estimates do not guarantee similar results in the future. [Learn more](#)

Price of adverts for “compare energy price” driven up to £9.86 per click.

Bid Simulator
✕

Changes can be made here and applied directly to your keyword. [Learn more](#)

Model and change bid on “compare energy price”

Max. CPC	Impr.	Top impr. ?
<input type="radio"/> £9.86	291	259
<input type="radio"/> £5.97	262	191
<input type="radio"/> £4.00	246	111
<input type="radio"/> £2.58	215	45
<input type="radio"/> £1.23	142	21
<input checked="" type="radio"/> £0.75 (current)	66	--
<input type="radio"/> £0.55	33	--
<input type="radio"/> Use a different bid: £ <input style="width: 50px;" type="text"/>		

Max. CPC	Impr.
£0.55	33
£1.23	142
£2.58	215
£4.00	246
£5.97	262
£9.86	291

Simulation based on performance from 5 Oct 2015 to 11 Oct 2015. These estimates do not guarantee similar results in the future. [Learn more](#)

uSwitch sitting on the No.1 position for the trademarked term theenergyshop

The screenshot shows a Google search for 'theenergyshop'. The search results are as follows:

- Compare Energy Prices - #1 Energy Price Comparison Site**
Ad www.uswitch.com/Energy
Switch Online And Save Over £512!
UKs #1 Energy Comparison - Best Comparison Site 2014
Energy Tariff Ending? uSwitch - Dual Fuel Rates
uSwitch Gas & Electricity uSwitch Exclusive Deal
- The Energy Shop - Official site**
Ad www.theenergyshop.com/
Ofgem approved Switch and save £350 a year!
- Compare Energy Prices - Moneysupermarket.com**
Ad www.moneysupermarket.com/Energy
4.5 ★★★★★ rating for moneysupermarket.com
Compare energy supplier prices and save up to £210 per year.
MoneySuperMarket has 1,971 followers on Google+
Compare Gas Prices - Home Bill Checker - Compare Prices & Switch
- TheEnergyShop.com - the award winning energy price ...**
<https://www.theenergyshop.com/>
Independent gas and electricity price comparison. Winner of Website of the Year 2012 by the Good Web Guide. Named Best Energy Switching Website by the ...
Gas & Electricity Compare all energy supplier...
Independent gas and electricity price comparison. Winner of ... Compare all energy suppliers and get the best deal. WINNER ...

uSwitch sitting on the No.1 position for the trademarked term theenergyshop and openly using the trademark in its advert (trademark infringement and / or passing off).

The screenshot shows a Bing search for 'THEENERGYSHOP'. The search results are as follows:

- Compare Energy Prices - Theenergyshop**
Ad - www.uswitch.com/Energy
#1 Energy Price Comparison Site. Switch Online And Save Over £383!
uswitch.com has been visited by 100K+ users in the past month
uswitch.com is rated ★★★★★ on Bing (1,186 reviews)
- The Energy Shop - Official site.**
Ad - www.TheEnergyShop.com
Official site. Compare all energy suppliers and save up to £435.
- E.ON - Limited Offer | eonenergy.com**
Ad - www.eonenergy.com/Fix
Switch Now For The Cheapest Fixed Price Tariff Of All Major Supplier!
Get A Quote Now Get A Business Quote
Age UK Fixed 2 Year Fixed 2 Year Tariff
- Business Energy - Quick Energy Quote on 0845 154 7627.**
Ad - www.BritishGas.co.uk/Business
Quick Energy Quote on 0845 154 7627. Get 10% Off Your Renewal Quote!
britishgas.co.uk is rated ★★★★★ on Bing (1,253 reviews)
Cheapest Electric Prices Compare Prices
Dual Fuel Prices Electricity Prices
- TheEnergyShop.com - the award winning energy price ...**
<https://www.theenergyshop.com/>
About TheEnergyShop.com. We are a free, independent and totally impartial energy price comparison service that brings you the cheapest deals for switching gas ...

On the right side of the Bing search results, there is a sidebar with a cookie notice and an advertisement for CNP Pro Energy.

uSwitch sitting on the No.1 position for the term My Utility Genius

Google my utility genius

Web Shopping Images Videos News More Search tools

About 1,780,000 results (0.44 seconds)

Cookies help us deliver our services. By using our services, you agree to our use of cookies. [Learn more](#) [Got it](#)

uSwitch Gas & Electricity - uSwitch.com
Ad www.uswitch.com/Utility-Compare
4.9 ★★★★★ rating for uswitch.com
Compare Gas & Electricity plans & take control of your bills today.
UKs #1 Energy Comparison - Best Comparison Site 2014
uSwitch.com has 852 followers on Google+
Comparison Tool - uSwitch uSwitch Gas & Electricity
uSwitch Official Site Save up to £512 on Energy

MyUtilityGenius: Energy Price Comparison | Cheapest Gas ...
<https://www.myutilitygenius.co.uk/>
MyUtilityGenius makes energy price comparison very easy. Find the cheapest gas and electricity deal and save on your energy costs.

55 Lowlands Rd, Harrow, Middlesex HA1 3AW
020 3468 0461

Compare Energy Prices
Compare energy prices with MyUtilityGenius can make you ...

Contact Us
... as simple as possible. To contact us, take your pick of ...

The Team
Meet the team of Energy Geniuses, led by our charismatic founder ...

Understand my Energy Bill
Let us break down your energy bill and explain it ... Understand my ...

About our Genius
About our Genius. MyUtilityGenius > About our Genius. tree1. tree2 ...

Suppliers
Please find below the list of all UK's energy suppliers ...

My Utility Genius [Directions](#)
Utilities contractor
Address: 55 Lowlands Rd, Harrow, Middlesex HA1 3AW
Phone: 020 3468 0461
Hours: Closed now · Hours
[Write a review](#)
Be the first to review

People also search for [View 2+ more](#)

British Gas uSwitch for Business Energy Live News Upad.co.uk

[Feedback](#)

uSwitch sitting on the No.1 position for the term unravelit

Google unravelit

Web Maps Images Shopping Videos More Search tools

About 179,000 results (0.64 seconds)

Compare Energy Prices - uSwitch.com
Ad www.uswitch.com/Compare-Energy-Price
4.9 ★★★★★ rating for uswitch.com
New Tariffs Are Lowest Since 2012 Switch Now And Pay Under £1K/Year
UKs #1 Energy Comparison - Best Comparison Site 2014
uSwitch.com has 852 followers on Google+
uSwitch Exclusive Deal uSwitch - Dual Fuel Rates
Energy Tariff Ending? uSwitch Official Site

UNRAVELIT
<https://www.unravelit.com/>
Provider of energy utility, insurance, credit card and loan price comparisons.

Compare & Switch
Compare and Switch. ENERGY. Compare & Switch · Home ...

Contact us
Get in touch, Contact us. If you are having problems switching ...

About
Learn more About the Unravelit service. If you think your ...
[More results from unravelit.com »](#)

About switching
About switching gas & electricity suppliers. Unravelit was the first ...

Suppliers
British Gas; Daligas; Ebico - EDF; Extra Energy; E.ON · First utility ...

Barriers to switching
About switching gas & electricity suppliers ... Barriers to switching ...

Barriers to Switching - Welcome to Unravelit
www.energyswitching.com/barriers_to_energy_switching.php
Unravelit was the first price comparison service to be officially accredited by Energywatch (now Consumer Focus), the UK's gas and electricity watchdog.

uSwitch sitting on the No.1 position for the term simplyswitch

The screenshot shows a Google search for 'simplyswitch'. The search bar contains the text 'simplyswitch' and a search icon. Below the search bar, there are navigation links for 'Web', 'Maps', 'Shopping', 'Videos', 'News', 'More', and 'Search tools'. The search results show 'About 419,000 results (0.78 seconds)'. The top result is an advertisement for 'Compare Energy Prices - Save Up To £512 In Minutes' from 'www.uswitch.com/Energy'. It has a 4.9 star rating and is described as 'The UKs #1 Energy Price Comparison Site'. Below the ad are links for 'uSwitch Official Site', 'uSwitch Gas & Electricity', 'uSwitch - Dual Fuel Rates', and 'uSwitch Exclusive Deal'. The second result is 'SimplySwitch' from 'https://www.simplyswitch.com/'. It is described as 'Find the cheapest energy prices by comparing gas and electricity deals. Use our leading energy comparison tool to get the cheapest gas and electricity.' Below this result are several sub-links: 'Understanding Dual Fuel De...', 'Compare Electricity Prices', 'Energy Suppliers', 'Broadband Deals', 'Contact', and 'Energy Guides'. The third result is 'Simply Switch cashback and voucher offers - Top CashBack' from 'www.topcashback.co.uk/simply-switch/'. It is described as 'Simply Switch's goal is simple - to help people save money quickly and easily. Save'.

Google

simplyswitch

Web Maps Shopping Videos News More Search tools

About 419,000 results (0.78 seconds)

Compare Energy Prices - Save Up To £512 In Minutes
Ad www.uswitch.com/Energy
4.9 ★★★★★ rating for uswitch.com
The UKs #1 Energy Price Comparison Site.
uSwitch.com has 852 followers on Google+

[uSwitch Official Site](#) [uSwitch - Dual Fuel Rates](#)
[uSwitch Gas & Electricity](#) [uSwitch Exclusive Deal](#)

SimplySwitch
<https://www.simplyswitch.com/>
Find the cheapest energy prices by comparing gas and electricity deals. Use our leading energy comparison tool to get the cheapest gas and electricity.

Understanding Dual Fuel De... **Compare Electricity Prices**
Dual Fuel deals can be a great way to save money on your gas ... Save money in minutes by comparing cheap electricity ...

Energy Suppliers **Broadband Deals**
See how your energy supplier measures ... Compare energy ... Find the best broadband deals by comparing prices today. Save ...

Contact **Energy Guides**
Contact Us – We're here to help! Home · Energy; Guides to Saving Money on ... How can I save ...
Customer satisfaction is our top ...

[More results from simplyswitch.com »](#)

Simply Switch cashback and voucher offers - Top CashBack
www.topcashback.co.uk/simply-switch/
Simply Switch's goal is simple - to help people save money quickly and easily. Save

uSwitch ad NOT appearing for the term moneysupermarket

Google

Web News Videos Shopping Images More Search tools

About 707,000 results (0.44 seconds)

MoneySuperMarket.com™
www.moneysupermarket.com/
 Helping British Households Make the Most of Their Money!
 100% independent · Free comparison service · Free to use
 Types: Car Insurance, Credit Cards, Energy, Personal Loans, Travel Insurance
 MoneySuperMarket has 1,972 followers on Google+

Credit Cards 0% APR
 36 Months 0% Balance Transfers.
 25 Months 0% on Purchases!

Our Lowest Loan: 3.5% APR
 Use Our Smart Search Tool.
 You Could Get This Low Rate.

Save Money on your Car Insurance with Google Sponsored
www.google.co.uk/compare/carinsurance
 51% of our users could save up to £205. Compare over 120 providers

Churchill	Privilege	Admiral
Hastings Direct	esure	Diamond
Swinton	LV=	RAC

Enter registration number

MoneySuperMarket - Helping You Make The Most Of Your ...
www.moneysupermarket.com/
 Helping British households make the most of their money. Save money on car insurance, home insurance, credit cards, loans & energy.

Car insurance You could save up to £212 on your car insurance with ...	Home insurance 51% of consumers could save up to £57 on their home insurance ...
Money Savings - Loans - Credit Cards -	Savings Compare all savings accounts

Money Super Market com

Moneysupermarket.com
 Website · moneysupermarket.com

Moneysupermarket.com Group PLC is a British price comparison website-based business specialising in financial services. The website enables consumers to compare prices on a range of products, including mortgages, credit cards and loans. [Wikipedia](#)

Customer service: 0333 123 1983

Stock price: **MONY** (LON) 317.12 GBX +0.72 (+0.23%)
 13 Oct, 16:35 BST - Disclaimer

Headquarters: Ewloe
CEO: Peter Plumb
Founded: 1993

Profiles

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Feedback

moneysupermarket ad NOT appearing for the term uswitch

Google

Web News Shopping Videos Images More Search tools

About 474,000 results (0.44 seconds)

uSwitch.com - uSwitch™ Official Site
www.uswitch.com/
 The Simple Way To Compare & Switch Energy Providers. As seen on TV!
 UK Based Call Centre · Quick & Simple Switching
 uSwitch.com has 852 followers on Google+

Comparison Tool - uSwitch
 The simple way to compare & switch Utility providers. Save up to £512!

Compare Credit Cards
 Find the Best Credit Card For You. All Circumstances Covered.

Mobile Deals - From £7.50
 Compare 1000+ Phone Deals Online. Cheapest Deals Under £8 Save Now!

uSwitch Exclusive Deal
 Cheapest fixed plan on the market. Switch now - Ends 3rd November.

GoCompare Gas & Electric - GoCompare.com
www.gocompare.com/Gas-Electricity/
 4.6 ★★★★★ rating for gocompare.com
 The Impartial UK Comparison Site. Switch To The Cheapest & Save!
 Now With Defaqto · We Won't Sell Your Data · Save Time & Money
 Electricity Only Deals · Simple Comparison in Mins · Switch to a Fixed Tariff

uSwitch
 Website · uswitch.com

uSwitch.com is a UK-based price comparison service and switching website founded in 2000. The site allows consumers to compare prices for a range of energy, personal finance, insurance and communications services. [Wikipedia](#)

Founder: George Mountbatten, 4th Marquess of Milford Haven
Founded: September 2000, London
Parent organization: Zoopla, Lloyds Development Capital

Profiles

Twitter

Feedback

uSwitch.com: Energy Comparison of Gas & Electricity ...
www.uswitch.com/
 Provides comparisons of gas and electricity suppliers, digital TV providers, home telephone providers, broadband internet and mobile phone packages.

Compare gas & electricity Compare gas & electricity plans across the whole market to get ...	Broadband & home phone Top 10 Best Broadband and Home Phone Deals & Bundles From ...
Broadband	Broadband & TV

Appendix 2 – Selected Non-Domestic TPIs

make it cheaper Blog About us Our people Careers Contact us

Signed up to My Account? [Log in](#) [My Account](#)

[Business Energy](#) [Business Insurance](#) [Phone & Broadband](#) [Merchant Services](#) 0808 169 2758

Business Energy

Our expert service makes it easy for you to switch to a better electricity or gas deal that's right for your business. All you have to do is ask.

Let's talk. Call us free on 0808 169 2758.
Calls free from UK landlines and mobiles.

Switching and saving is easy. Start here.

You complete the form, we call you, good things happen.

Your full name

Business name

Your telephone number

Your email address

By providing your details you confirm you agree with our terms and conditions and privacy policy

[Next](#) >

uSwitch forBusiness.com Home Business energy Business Insurance Business broadband


Switch the electricity or gas at your business premises

We'll compare the market and get your business a better energy deal.

Find out how much you can save, call us free on:

0800 138 9095

Or fill in the form to get a call from us.
Calls free from UK landlines and mobile.



Title

Your first name

Your last name

Your company name

Your email address

Your telephone number

[Call me back](#) ▶



Why use uSwitch?

- ✓ We compare the market, including the Big Six and many smaller suppliers
- ✓ It's simple - all we need is some information about your current energy supply
- ✓ You could easily save more than 30% on your business energy bills
- ✓ If you're not in window to switch, we'll get back in touch when you are
- ✓ We'll get in contact when the time is right for you to switch and save again



Call us now on

0800 977 44 31

for a free quote

Business Electricity & Gas

Latest rates:

Gas from 2.5p / kWh | Electricity from 9.8p / kWh



Save up to 70% on your business energy bills

Call 0800 977 4431 or fill in your details for a quote

Title First name Surname

Mr

Business Name

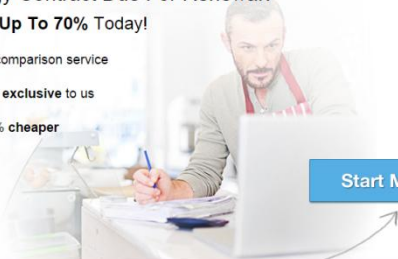
Contact phone number

Email address

[Savings Quote](#) >

Business Energy Contract Due For Renewal?
 Compare & Save Up To 70% Today!

- Easy to use comparison service
- Supplier rates exclusive to us
- Bills up to 70% cheaper



[Start My Quote](#)

Compare Business Energy Prices From Top Energy Suppliers

Why Switching Your Business Energy - Is Easier Than You Think

Tell us a little bit about your business.

Choose Utility
 Gas Electricity Both

First Name

Last Name

Company Name

Company Postcode

Email Address

Telephone Number

[Get My Quote](#)

We will never sell your data or share it with any third parties. Promise! View our full [privacy policy](#)

Our business energy experts save you

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THANK YOU!

Your personal switcher will call you shortly to discuss the best money saving deals for your business.

Please have your most recent energy bill to hand.

TRUSTPILOT Excellent 9.4 from 0 - 10

DID YOU KNOW...

SwitchMyBusiness could also save you money on your business insurance! Get and an obligation free quote below:

switch my insurance ▶
We have exclusive rates from the best suppliers

[find out more ▶](#)