

## Inenco Direct

[REDACTED]

Inenco are a longstanding energy market TPI, recognised as one of the market leaders in both the SME and Corporate market. [REDACTED]

[REDACTED]

Inenco Group operates as Inenco Direct in the SME market and is one of the largest outbound telesales operations. Inenco are currently signed up to the Eon TPI Code of Practice, the UIA TPI Code of Practice and contributed to the Ofgem TPI CoP Working Groups. Inenco Group employ over 450 staff of which Inenco Direct employ currently just under 200 people. Please note, Inenco were incorrectly referred to as Ineco in the Provisional Decision on Remedies document.

**Price transparency online – we believe the CMA has fundamentally misinterpreted the reason for the current state of competition in the SME energy market and the drivers of current levels of engagement. As such there is a true risk of the proposed remedies destroying switching by putting ~1400 TPIs and a growing number of New Entrant Suppliers at risk.** [REDACTED]

[REDACTED]

- According to Cornwall Energy 55% of SME electricity and 65% of gas switching activity prompted by TPIs. These figures are based on supplier by supplier assessments of the proportions of their new business that they derive from TPIs. These assessments range from 50% for the largest suppliers able to resource alternative routes market to 90% for small, independent suppliers.
- Ofgem has stated that TPIs play a key role in offsetting weak customer response and in the future development of further energy services.
- The assessment of “micro-business customer” being 50 MWh or less for Power and 72 MWh for Gas is also vastly inflated and opens up a far more substantial subset of the SME market (~85%) than most people will typically consider when referring to micro-business customers and we believe this goes well beyond any volume threshold potentially required.
- The remedy of giving SME customers access to information based on the assumption that this is a large barrier to engagement is fraught with risk.
- The SME market suffers from similar weak customer response issues as domestic with similar opportunities available to access from switching. Everyone is satisfied that TPIs are a key aspect of the SME market, as long as they act reputably, with TPIs currently offering a pro-active competitive sales channel for new entrant suppliers.
- [REDACTED]

- SME's are disengaged from the energy market predominantly through complete lack of interest in managing their energy bills as there is often no emotional link to their core business performance and expertise. Often owners are entrepreneurial types or these are lifestyle businesses, either way there is typically little focus or expertise in growing a business through managing costs.

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- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]