

Your details

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**Q1: Title (e.g. Mr, Mrs, Ms, Dr, etc)**

Mr

**Q2: Forename**

Warwick

**Q3: Surname**

Molloy

**Q4: Email**

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**Q5: What is your role / profession?**

Principal Consultant & Senior Software Developer

**Q6: Are you representing yourself or an organisation?**

An organisation

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Publishing your details

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**Q7: If you are representing yourself rather than an organisation would you be content for us to include your name when we publish your response?** *Respondent skipped this question*

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Your organisation

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**Q8: What is the organisation's name?**

MyWave Group Limited

**Q9: Please could you briefly explain the role of your organisation, including the sectors in which it operates or has most interest?**

MyWave makes a personal intelligent agent, called Myia. Myia makes complicated tasks simple by doing the heavy lifting. Myia's first skill in the UK is to help people switch to a better tariff and save money.

Myia has relevance in other sectors, too, such as online shopping, health and banking, but these are yet to be realised.

Saveawatt uses the MyWave platform in New Zealand to help consumers stay on the best deal available to them by reviewing the market regularly, automatically.

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Theme 1: Consumers' perceptions, use and experience of DCTs

**Q10: 1. When and why do consumers use DCTs? To what extent do they trust them?**

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Online services are normal - whether looking for a better deal on travel, looking for a new home or sharing images and ideas with others.

Our own experience launching Myia has shown that people are open to new things online so trust is less of an issue than the motivation to seek out the service in the first place.

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### **Q11: 2. How do consumers choose which and how many DCTs to use?**

Nothing to add

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### **Q12: 3. What are consumers' expectations of DCTs - for instance in terms of market coverage and the relationships between DCTs and the suppliers they list?**

There's a balance between being armed with information and being drowned in data. People want to relevant information, quickly. I believe people don't want to be hoodwinked but that's less of an issue if they still get a choice and are not pressured into making a rash decision.

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### **Q13: 4. What are consumers' experiences of using DCTs? Do they benefit from using them and, if so, how? What works well and what could be improved?**

Nothing to add.

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## Theme 2: Impact of DCTs on competition between suppliers of the services they compare

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### **Q14: 5. What factors influence suppliers' use and choice of DCTs and why?**

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### **Q15: 6. To what extent do DCTs make it easier for suppliers to enter the market, attract more consumers and engage more effectively with them?**

[<]DCTs present an online face and opportunity for impulse-based exploration of energy tariffs. DCTs are in a weak position to create demand through marketing and hope to engage customers who explore Energy options.

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### **Q16: 7. How have DCTs affected competition between suppliers? What impact has this had on the price, quality and range of products offered by suppliers?**

DCTs have made it easier to switch on impulse. That means when a customer is enraged by their current supplier, a DCT is an easy outlet for that anger. As long as the dominant force behind switching activity is apathy, DCTs can't have much effect on supplier behaviour.

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### **Q17: 8. What are the barriers, if any, to DCTs increasing competition between suppliers, and how can these be overcome?**

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If the Energy Supplier Special License Conditions required suppliers to pay DCTs for valid customer leads, then DCTs would be stronger and more able and have more interest to advertise to stimulate switching. This would also push retailers to offer more sustainable tariffs rather than cut margins to the bone. To work, though, the regulator would need visibility of both DCT and Supplier behaviour.

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In New Zealand, an electronic registry exists that plays a central role in communicating customer switches from retailer to retailer, as well as many other changes. By operating a similar registry where DCTs can lodge customer switches, the regulator would get more visibility and such conditions can be enforced.

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**Q18: 9. In what ways, if any, have DCTs changed suppliers' approach to consumers - for instance in terms of whether they treat consumers who use DCTs differently to those who do not?**

I lack the data to comment.

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### Theme 3: Competition between DCTs

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**Q19: 10. In what ways do DCTs compete with each other -for instance in terms of coverage, the savings consumers can make, the services they provide, their ease of use, transparency and how they protect consumers' data?**

Especially with the Confidence Code, many of these things are points of parity, not difference. The main ways a DCT can compete are brand awareness and getting special tariff arrangements by helping to facilitate a Collective Switch.

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**Q20: 11. What factors influence how effectively DCTs can compete - for example, whether they can secure the necessary consumer data, supplier information or other data?**

The challenges to competition are:

- limited differentiation (Confidence Code drives alignment)

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- difficulty in scraping supplier sites for tariff information that is described in various, non-standardised formats - some are spreadsheets, some PDF, some tariffs are listed in Web Applications that attempt to exclude DCTs. - consumer data is hard to come by - addresses and meter information is poorly recorded in digital databases; consumption data is most easily obtained by asking the consumer to enter the information off a bill.

About 50% of consumers stop very early in the process when they realise they need a bill. [&lt;]

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**Q21: 12. If there are barriers to competition between DCTs, how significant are these and how can they be overcome?**

Offering improved address, meter and consumption data would enable DCTs, especially smaller ones and new entrants, while also making the process of switching much easier and more accessible for consumers.

That would leave the DCTs to compete over brand recognition, service and customer rapport which are the normal levers of competition.

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### Theme 4: The regulatory environment

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**Q22: 13. Are there any areas of regulation or self-regulation applying to DCTs that lack clarity, certainty, consistency, or enforcement?**

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I lack data that suggests regulation is too tight or too loose, in general. The Confidence Code certainly creates some steep operating costs: - audit and compliance costs  
- complexity of scraping tariff data from various retailer websites in whatever format retailer chooses to publish  
- requirement to present all tariffs while many retailers refuse to work with DCTs and therefore benefit from free exposure to the public at great expense to the DCT.

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**Q23: 14. Do there appear to be any areas where DCTs may not be meeting competition or consumer protection requirements?**

I'm unaware of any such cases.

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**Q24: 15. Do any aspects of regulatory approaches to DCTs need to change and, if so, why?**

Please review aspects of the Confidence Code that lead to operational cost. This may help some DCTs find more money for marketing which would help make the market more efficient, overall.

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### Future developments, other comments and further contact

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**Q25: 16. Finally and in relation to all of the issues above, what likely developments over the next three years should we take into account and why?**

Data availability:

- accurate, centrally-serviced and low-cost access to address data; meter data and tariff data would reduce the data entry burden on consumers and enable smaller DCTs to operate
- increased visibility to all switching through a central registry would help CMA and OFGEM and could be used to bring all suppliers to the bargaining table with DCTs

Reducing the burden and confusion for consumers will enable more people to switch.

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**Q26: Do you have any other comments you would like to add?**

No thank-you

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**Q27: Would you be willing for us to contact you to discuss your response? Yes**

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