

Sent by email

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Mr David Fowlis
Project Manager

Energy Market Investigation
Competition and Markets Authority
Victoria House
Southampton Row
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18th November 2016

Dear Mr Fowlis,

CMA Draft Energy Market Investigation (ECOES/DES) Order 2016 Consultation

Thank you for the opportunity to respond to the above consultation. As the custodian of the Electricity Central Online Enquiry Service (ECOES), the Master Registration Agreement Service Company (MRASCo) remains fully supportive of the ECOES Remedy. We believe the ECOES and Data Enquiry Service (DES) remedies should, if carried through appropriately, enhance Price Comparison Websites' (PCWs) ability to engage with customers and thereby improve competition in the retail energy market.

However, as highlighted in our response to the initial draft of the Order (dated 29th September 2016), we are concerned that the proposed effective date of 28th February 2017 does not allow sufficient time for the development and implementation of the most effective solution which will enable PCWs to deliver the full benefits to customers, as envisaged by the CMA.

In determining a solution that meets the intent of the Order, we have engaged with PCWs, Ofgem, Xoserve, Energy Suppliers and Electricity Distributors through the Third Party Access Working Group (Working Group). The Working Group identified and assessed four options for providing PCWs with access to data from ECOES. The options considered included data extract files delivered using a DVD or made available via a secure server, live access via a Graphical User Interface (GUI) and machine to machine access via an Application Programming Interface (API) solution.

Following careful assessment of the four options, the Working Group recommended the adoption of the API solution as the mechanism for providing dual fuel PCW access. An API provides machine to machine access, which compared to a GUI is a more scalable and efficient solution in terms of the time it takes to process requests. A further advantage of the API solution is that it allows for automated PCW requests to be made in real time (i.e. while a customer is looking to run a comparison). Additionally, requests can be made on a customer by customer basis, with no information released from ECOES before the customer has provided the PCW with positive consent to use their personal data, thus providing an audit trail of data requested from ECOES. As such, the

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proposed solution would not only comply with current Data Privacy legislation but also with the impending EU General Data Protection Requirements (GDPR) which will come into force in May 2018.

To further inform the Working Group's assessment, a consultation on the proposed arrangements was issued to PCWs in October 2016. The consultation which concluded on 1st November 2016, received a total of seven responses, representing the views of both large and small PCWs. All respondents were strongly in favour of the API and advocated for the adoption of a joint solution for gas and electricity data items. Bringing this information together not only provides cost savings for PCWs and gas and electricity industry parties, but also presents an opportunity to simplify and harmonise industry processes which should lead to a faster and more reliable customer switching journey facilitated by PCWs.

We recognise that Xoserve's principal commitment is to deliver and implement Project Nexus. As such, a number of discussions have already taken place with Xoserve over the prospect of ECOES facilitating a "dual fuel" gas and electricity API solution, MRASCo remains hopeful that an agreement can be reached.

We note the CMA's recommendation to utilise the existing services and infrastructure to meet the proposed effective date of 28th February 2016 for the Order. However, given the advantages of the API solution, we recommend that the CMA considers a revised date for the Order to enable the delivery of a sustainable solution. In our view, a positive customer switching experience is not only underpinned by the availability of data but also the speed, accessibility and reliability of such information. We therefore believe that considering interim solutions will not deliver the full benefits intended by the Order.

Yours sincerely,

Alex Travell
Chairman of the MRASCo Board of Directors