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## **Input into the CMA Draft Orders on ECOES and DES**

### **Background**

Octopus Energy is a rapidly growing independent supplier that started supplying gas and electricity to domestic homes and businesses in Great Britain this year. Our largest investor is the Octopus Investments Group, who over the last decade have become the third largest investor into UK renewable generation in the UK and the largest in solar generation.

We believe:

- That the consumer should be given clearer communication about pricing over a longer period: so that they can choose a tariff that is good for them over the long term, not just the fixed term.
- That long-term good pricing and service can be enabled by some of the same approaches as the eCommerce sector (in the same way that Amazon and budget airlines have done in other sectors).
- That the barriers to switching due to the slow and complex nature of the switch process should be systematically eliminated to make switching quicker and easier (as online shopping and services have provided in other sectors).
- That customer service should be measured by how happy customers are with the service they receive, not a set of defined metrics which often fail to recognise what really matters to consumers.

### **Viewpoint on the Draft Order**

We are supportive of giving Price Comparison Websites (PCWs) access to ECOES and DES. We would suggest that in order to manage the access to this very personal consumer data, that the PCWs should be required to be accredited under the Ofgem scheme – and that only those with current accreditation (currently a good proportion of the PCWs) should be granted the access each year.

We also feel fairly strongly that the PCWs need to take on the responsibilities that go with such a high level of data access to the whole of the British domestic energy customer base:

- 1) PCWs with this access need to be held to the standards for the planned faster switching. This will require real-time API linkages, rather than the current clunky and time-consuming file transfer which builds extra layers of time, communications to the customer and a second set of contracts into the customer switching process.
- 2) PCWs need to be held to exactly the same standards for collecting, collating and passing on correctly Customer Vulnerability data (PSR) as suppliers. This should be audited and reviewed by Ofgem in the same way as they review it with suppliers. Notably, we are least able to manage the PSR requirements of customers who arrive via PCWs because there is no common standard or emphasis on this from PCWs.
- 3) PCWs need to be a part of the industry action plan for reducing Erroneous Transfers (ETs). We assume that the number of ETs originating from PCWs would be tracked, and investigated by Ofgem in instances where they were inexplicably high.
- 4) PCWs need to take responsibility for updating data and reporting errors to the relevant authority – as data quality is one of the biggest issues behind ET and can also act as a barrier to switch.

Yours Sincerely,

Greg Jackson  
Founder and CEO  
Octopus Energy