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Thursday 17<sup>th</sup> November 2016  
via Email to: [energymarket@cma.gsi.gov.uk](mailto:energymarket@cma.gsi.gov.uk)

**Dear David,**

Thank you for providing the opportunity in responding to the open consultation with the proposal to introduce requirements to support Microbusiness customers. We ask that our points are considered in your final decision relating to Energy Market Investigation order.

We would firstly request that clarity on the draft order is made before any final decision is given; we note that there are disparities between the explanatory note and the draft order. The explanatory note refers to the type of information that is to be disclosed; however the draft order has a different set of requirements around the transparency of tariffs. The definition used throughout interchanges between 'Non Domestic Customers' and 'Micro Business' customers, the two are not the same and we can only assume this proposal is limited to Micro Business customers only.

We do support the principle of removing barriers, perceived or otherwise to ensure Micro Business customers are protected from unfair competition or non-transparency of contract terms and costs. In terms of the proposals being made as part of this order we would ask that consideration is given to the timelines that would be imposed to make available an online quote tool. If the requirement is to build an online quotation tool, for a small supplier this would be a significant project to ensure the correct data and tariffs can be made available and the customer journey is built, and tested before launch.

In relation to the removal of auto roll over contracts, Good Energy does not operate this practice and therefore welcome this move to ensure consistency across the market.

The draft order suggests a reduction in the amount of tariffs being available; currently suppliers operate a more bespoke negotiation around blended tariff costs which is cost reflective. Moving to structured tariff offerings may result in consumers paying more, albeit with less complexity. We want to ensure that the right balance of price transparency and simplicity for customers when choosing the most appropriate energy deal. We also question how this proposal would support group customers where they would currently benefit from a tailored tariff; your proposal would result in many different tariffs being offered with different contract terms, against something which consumers may not welcome and could create a lengthy sales process.



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I trust our response assists with your consultation. In summary three areas which we would like raised, clarity on the conflicting terms and drafting in the explanatory note and order, consideration of adequate timelines should this be implemented to have an online quotation tool in place and the balance of price transparency through tariffs and simplicity for consumers.

**Kind Regards,**

**Peter Berry**  
**Senior Compliance Manager**  
**Good Energy**

