



Third-Party Intermediaries  
GB Energy Sector  
via email

[www.gov.uk](http://www.gov.uk)

18 March 2026

## Supporting Non-Domestic Consumers in the Current Situation

Dear Colleagues,

We are writing to you in light of the volatility and increases to wholesale energy prices in the UK, following the escalation of the conflict in the Middle East. These sharp rises have caused concern among households and businesses, and we want to reach out to key stakeholders early on to share our thoughts on how you can play a part in helping customers. We are grateful to those that have already shared insights with us.

Government, regulators, and organisations across the energy industry are already taking positive steps to protect all consumers at this time, and we thank you for your continued commitment. As you know, our firm expectation is that pricing remains fair, transparent and fully justifiable, reflecting genuine market conditions.

We acknowledge the value that energy brokers and other Third-Party Intermediaries (TPIs) can provide in the energy retail market. In particular, you can help many non-domestic consumers find gas and power deals tailored to their circumstances, while navigating complex energy contracts, and support the uptake of clean technologies and energy efficiency measures. At a time when many businesses may be renewing their contracts, with the ongoing situation in the Middle East businesses may find this process more challenging than usual.

However, during the height of the 2022 energy crisis, we know that consumers had decidedly mixed experiences with some TPIs. While many TPIs leveraged their expertise and navigated a fast-moving supply market to secure appropriate, good value contracts for their consumers, we also saw examples of poor practices, including fraud and clients being pressured into unfavourable contracts that gave the TPI high commission payments.

Recent events in the Middle East have driven us into another period of elevated wholesale energy costs and higher market volatility. We are sharing our views for how non-domestic consumers should be supported in this situation, particularly charities, small businesses and business contracts that supply domestic end consumers, for example in heat networks. Put simply, good consumer outcomes should be at the forefront of all advice and decision making.

TPIs should continue to comply with existing legal requirements in their dealings with customers as relevant, including the Business Protection from Misleading Marketing

Regulations 2008, duties arising from being a procurement agent for a customer, and for those providing services to small business customers, obligations relating to maintaining membership of a qualifying dispute settlement scheme, and adhering to its terms of membership. You should also ensure that micro businesses understand the principal terms of any contract (including commission costs, and how changes in wholesale prices or non-commodity costs would affect the price) and are aware that any verbal agreements made are legally binding.

We expect you to take steps to help protect consumers during this period of price instability. This should include:

- Reviewing training, guidance, and scripts for consumer-facing staff to ensure they understand how to comply with the relevant legal and regulatory requirements.
- Being clear with consumers when you are providing factual information and when you are providing subjective advice. This is particularly important when recommending contracts, including views about the impacts of short-term versus long-term contracts.
- Considering your approach to commissions. In particular, we would encourage you to check that commissions are not structured in a way that creates a financial incentive to favour higher cost contracts or suppliers, over the most appropriate choice for a consumer.

We know that many brokers and other TPIs will already be operating in line with the expectations above. We would like to recognise and thank these members of the industry who have led the charge to improve standards through their own behaviour and through their contributions to voluntary codes of practice and other initiatives to establish best practice.

The government plans to appoint Ofgem to regulate TPIs when parliamentary time allows. In the future, Ofgem regulation will be central to setting expectations, monitoring risks and taking decisive enforcement action against exploitation. While TPI-specific regulation is not yet in place, we have committed that only fit and proper TPIs will be able to continue to operate in the regulated market. We will be carefully monitoring the TPI market as we work to design this future regulatory regime.

We are confident that the TPI community will continue to work constructively with their customers, suppliers and others to provide consumers with the best options for their situation and appropriate, risk conscious advice during this challenging period of market uncertainty.

We have written in similar terms to all non-domestic suppliers in Great Britain to set out our expectations of how they can best support customers during this period. I am sure they will be in contact about how TPIs and suppliers can best work together to support current and future consumers. We realise that suppliers and brokers must act as part of the wider system and we have already spoken to Business Representative Organisations, and to the Competition and Markets Authority, and we will continue to do so over the coming days.

We want to end by thanking all your staff for their work at this difficult time. We will stay in close contact with you as the situation develops and going forward, as future regulation is developed with your input.

Yours ever,

A handwritten signature in black ink, appearing to read 'Ed Miliband', with a long horizontal flourish extending to the right.

**RT HON ED MILIBAND MP**  
Secretary of State for Energy Security & Net Zero

A handwritten signature in black ink, appearing to read 'Tim Jarvis', with a large, stylized initial 'T' and a horizontal line above it.

**TIM JARVIS**  
Director General for Markets, Ofgem