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Ecotricity Reference No.: 413
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**The Renewable Energy Company Ltd (Ecotricity) Response to Consultation on
Ofgem's Review of Typical Domestic Consumption Values**

Dear Diego Villalobos,

Ecotricity is an independent renewable energy supplier with just over 74,000 electricity and gas customers across the UK. We pride ourselves in the professional, transparent and personalised customer service that we offer, which is consistently recognised by our customers and independent third party surveys.

Having reviewed Ofgem's proposals for updating typical domestic consumption values, we have taken the decision to share our own experiences with, and concerns over, the use of 'typical' consumption values. We are agnostic with regard to the methodology and data sets used by Ofgem for the calculation of these figures; and find it of more relevance to discuss the implications that the use of these figures will have on the UK energy consumer.

The reduction in domestic consumption patterns over the last decade, to which Ofgem refers, has not transpired from our own customer base. However, we acknowledge that this could be explained by the demographic groups that the majority of our customers fall into.

The Use of Typical Domestic Average Consumption Levels in General

Wherever possible, we actively discourage our staff and customers from using national averages. Our experience suggests that everyone's consumption is different, depending on the house they live in; their geographical location their lifestyle choices; and other individual circumstances. We strongly believe that mandating the use of these values for the purposes of various information labels, as suggested in the RMR proposals, will cause significant confusion and frustration among customers. We envisage recording numerous complaints from customers calling us to enquire how these figures relate to them and why such irrelevant information is being provided in their personal communications.

The Reduction in the Typical Domestic Average Consumption

Another concern that we would like to highlight is the risk of the new, lower figures, being 'mis-sold' by price comparison sites; and other similar third party organisations; as cost savings that are now available to customers who use their services. Ofgem must give careful consideration to how these figures will be used and monitored on a broader scale.

Conclusion

To conclude, whilst we agree with the need to monitor consumption patterns and to update these figures for statistical purposes, we do not see any benefits in mandating the use of typical figures to communicate with individual customers. We strongly encourage Ofgem to reconsider the scope of its review; as well as the risks associated with communicating lower 'typical' figures to the industry.

Ecotricity welcomes the opportunity to respond and hope you take our comments on board. We also welcome any further contact in response to this submission. Please contact Holly Tomlinson on 01453 769301 or holly.tomlinson@ecotricity.co.uk.

Yours sincerely



Holly Tomlinson
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