



## Consultation on Guidance for Third Party Intermediary Alternative Dispute Resolution scheme criteria

March 2023

Love Energy Savings.com Limited have previously responded to Ofgem's requests for input regarding microbusinesses, as we are committed to good customer outcomes. These outcomes directly feed into customer engagement in the market and drive further competition, therefore, it is key to promote and protect them. Our consultation responses encompass our thoughts as a third-party intermediary (TPI) and as an aggregator (Evolve Online Tech), as we feel it is important to consider that TPIs in the market vary in size and operation. We have noted below our overall response to Ofgem's consultation.

We acknowledge there are times where any TPIs service might fall short of the expected standards or something may not go according to plan, therefore, customers need a suitable and robust process to raise concerns. We also understand the role an independent and fair alternative dispute resolution provider can play in handling complaints for customers, where those customers do not believe they have received a fair resolution to a complaint from a TPI. We strongly believe that a Qualifying Dispute Settlement Scheme (QDSS) provider must be fair, independent, consistent, cost effective and have a thorough understanding of the market.

The option to have more than one QDSS provider may offer flexibility for some TPIs in the market. It might provide them with options which they might find more cost effective and suitable, whilst still enabling the customer to receive a fair and independent outcome to their complaint. However, it is worth noting, that in practice, it is unlikely that another provider will qualify as a QDSS, because:

- The proposed guide requirements are set at such a level it is unlikely any other providers, other than the Energy Ombudsman, may meet them.
- If the Energy Ombudsman is already deemed a QDSS provider, what is the supplier incentive to allow another.
- There is the potential that suppliers might have differing views of who meets the QDSS provider criteria. This might lead to ineffective complaint handling if the matter crosses over two suppliers and only one deems the provider as being a QDSS.
- From an aggregator perspective, having multiple QDSS providers will make collecting and monitoring QDSS registrations unmanageable. This would potentially increase the risk of suppliers breaching the Supply Licence Conditions.

We understand Ofgem's need to allow for more than one QDSS provider, and there may be benefits to having the flexibility to use other providers (e.g., cost and choice). However, based on the above, we would recommend consideration is given to the above points highlighted, to ensure good customer outcomes are maintained and market competition is not impacted. We look forward to Ofgem's update on this topic later this year.

**Love Energy Savings.com Limited**