

ABOUT BCC

Across the UK, the 53 Accredited Chambers that make up our network are trusted champions of businesses, places, and global trade. Together, we represent tens of thousands of businesses of all shapes and sizes, which employ almost six million people across the UK. Our growing Global Business Network also connects exporters with over 75 markets around the world.

Working together, we help firms of all sizes to achieve more. We believe it's our relationships with others that lead us to achieve goals beyond those we could ever achieve alone. We're the only organisation that helps British businesses to build relationships on every level, in every region and nation of the UK. Our network exists to support and connect companies, bringing together firms to build new relationships, share best practice, foster new opportunities, and provide practical support to help member businesses trade locally, nationally, and globally.

INTRODUCTION

The majority of responses in this consultation response are deliberately light touch, given that views on a number of these areas were expressed in the original consultation earlier in the year.

RESPONSE TO CONSULTATION

Q1. Do you agree with our proposal to agree voluntary improved pricing transparency and if so, please include comments on the particular areas you would like to see made more transparent?

Yes

Q2. Do you agree with our proposed definition of 'significantly exceeds'? Please provide your reasons.

Yes, because we believe it fits what is required.

Q3. Do you agree with our proposal that suppliers should review deemed contract rates quarterly? Please provide your reasons.

We believe this is an appropriate length of time. Any more frequently would provide unpredictability for consumers. There is probably enough of an argument to suggest that anywhere from quarterly to every 6 months would be appropriate.

Q4. Are there any potential implications for domestic customers that the proposed guidance on deemed contract rates may impact on?

We don't believe so.

Q5. Do you have any further comments on our proposals for the deemed contract guidance?

n/a

Q7. Which documents, or combination of documents do you believe would provide a robust evidence base to demonstrate a genuine CoT/CoO?

n/a

Q8. Are Micro Business Consumers aware they can contact Citizens Advice for support? Do we need to introduce a rule requiring suppliers to signpost them more specifically?

Some are but any obligation to signpost would be welcome.

Q9. Is an obligation requiring efficient and timely complaints handling needed? If so what are the costs and benefits associated with introducing this?

Yes, given the obligations on consumers to respond to suppliers in a timely manner in various ways, especially with regard to payment, we would welcome an obligation requiring efficient and timely complaints handling. In terms of the additional costs on suppliers to implement reporting processes, improved efficiency in handling complaints would invariably lead to cost savings overall.

Q10. Is an obligation requiring recording, handling and processing of complaints in accordance with consistent rules needed? If so, what are the costs and benefits associated with introducing this?

Yes, see above in answer to Q9.

Q12. We are seeking stakeholder views on our suggested proposals to government around increasing access to the Energy Ombudsman. Should there be a threshold on who can access the Energy Ombudsman? If so, where should this be set?

Following conversations with the Energy Ombudsman and businesses, we agree with the proposals to expand access to the Energy Ombudsman. We believe this threshold should be somewhere in the SME range, given that for a number of larger businesses, using the Energy Ombudsman would not necessarily be the most suitable form of redress.

Q13. We are seeking stakeholder views on the proposed changes to the rules requiring suppliers work with TPIs who are members of a redress scheme. Additionally, what are your views on the costs and benefits associated with the different proposals?

We don't have particular views from our membership over which proposal would be preferable but support any move to broaden access to redress schemes.

FOR MORE INFORMATION

If you would like to discuss this submission, please contact [REDACTED]