

## **CHAPTER: One**

**Question 1:** Are there other key issues that we should be looking into in the non-domestic sector?

We would like to see the introduction of a cooling off period on contracts based on email or paper notification of terms, not binding phone contracts. Many Small and Micro businesses don't realise a phone commitment is binding. We would also like to see much greater tariff comparability and simplification for Small and Micro businesses as per your survey conclusions that Small and Micro business understanding of the energy market is akin to domestic.

**Question 2:** What would stakeholders like to see on our website to help business customers and support a competitive supply market?

As important as the info that goes on a web site might be, its simplicity and clarity are key. Of overriding importance is the knowledge in the wider world that this info. is on the web site, this is where suppliers need to be used to publicise (and not hidden away) the existence of this info and the web address.

## **CHAPTER: Two**

**Question 3:** Do stakeholders agree with our proposals to extend the scope of SLC 7A to include a wider small business definition, and do you agree with our proposed definition?

We are very pleased with this proposal and its scope.

**Question 4:** Do stakeholders foresee significant costs or complications if we were to introduce our proposals? If so, please provide details and cost estimates.

Can't help on this one.

**Question 5:** Do stakeholders agree with our estimates on the number of extra businesses covered by our proposed definition?

Can't help on this one.

**Question 6:** Do stakeholders agree that we should review termination procedures and our current position that allows automatic rollovers?

Yes, we have argued long and hard that end of contract procedures, suitable termination notification, auto roll-overs and limits on deemed rates need to be looked at and improved considerably.

**Question 7:** Are there other clauses that stakeholders believe we should be reviewing, in light of our expanded definition proposal?

The energy usage of many Micro businesses is not dissimilar to domestic usage, so when the review into the domestic market is complete we would like to see the possibility of domestic protections extended to low use Micro businesses.

## **CHAPTER: Three**

**Question 8:** Do stakeholders agree with the conclusions we have drawn?

Generally yes.

**Question 9:** Do stakeholders agree that we do not need to make changes to SLC 14 governing objections to supply transfer for non-domestic suppliers?

As long as there is protection for Small businesses against sharp practice it wouldn't matter where the protection came from. We think you are in the best position to judge best how to police this area of regulation.

**Question 10:** Do stakeholders believe that we should publish our data relating to supplier objections on a regular basis?

Publishing data is always a good thing, particularly when data shows an improving situation, but it also must show evidence that action is being taken when figures are not what can be expected.

**Question 11:** Are there other issues with the objections procedure, other than the obligations of the licence condition, which stakeholders consider need to be addressed?

We agree with your comments that transfer blocking may need to be looked at in conjunction with auto roll-over and possible investigation procedures.

**Question 12:** Do suppliers who have voluntarily sent data have views on whether the data we currently ask for on a monthly basis needs to change and why?

Not FSB territory.

#### **CHAPTER: Four**

**Question 13:** Do stakeholders agree that the introduction of a new supply licence condition focussed on sales activities is a suitable method to prevent harmful sales and marketing activities in the non-domestic sector? The Retail Market Review: Non-domestic Proposals 44

We are pleased that action is being taken in this area, but again, leave the choice of most effective route to achieving the desired outcome to you, as long as whatever proposal is decided it has teeth!

**Question 14:** Do stakeholders agree that this licence condition is necessary if Ofgem decides not to proceed with its Standards of Conduct proposals?

See above.

**Question 15:** Do stakeholders consider the introduction of an accreditation scheme for TPI Codes of Practice will reduce harmful TPI activities across the whole market?

We think it is a good starting point as long as the checking procedures are robust enough and the sanctions for breaking the Code are punitive enough to deter transgressors, if there is no enforcement then the effect could be limited. We also think it should be mandatory to join an accredited Code scheme.

**Question 16:** What do stakeholders consider to be key criteria for an accreditation scheme for TPI Codes of Practice?

See above.

**Question 17:** Do stakeholders believe it is necessary for TPIs to disclose their actual fee, or would making clear the fact that the customer is paying a fee for their services be sufficient?

The method by which TPI's derive their payment, the amount, or percentage of commission, should be disclosed, as should whether this is added on to the bill or is included at source so that it is not a surprise additional cost to the customer that hadn't been considered when the TPI quoted.

#### **CHAPTER: Five**

**Question 18:** Do you feel the revised SOC's will help to achieve our objectives?

Enhancing the SOC's is a good move, but will TPI's be included in the scope where they are the billing company rather than the energy supplier and if not should they be?

**Question 19:** Do you agree that the SOC's should be in a licence condition and enforceable?

If they are a licence condition then TPI's will be excluded from the scope so maybe other provisions for this sector need to be made, but they do need to be enforceable.

**Question 20:** Do you agree the revised SOC's should apply to all interactions between suppliers and consumers?

Yes, it makes no sense to have some sections covered and others not, this leads to grey areas of enforcement that cause more trouble and difficulty deciding which side of the line things lie.

**Question 21:** Do you have information regarding potential costs this may impose on suppliers?

Not our area.

**Question 22:** Do you think these proposals should apply to the whole non-domestic market, or only a sub-set of it, eg small businesses?

We are only concerned with Small businesses and are not sure of the impact on other sectors.

**Question 22:** Given your answers to the questions above, do we still need the licence changes proposed elsewhere in this document?

We will bow to your judgement on what actions are required to take these matters to a satisfactory conclusion.

Best regards

David

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