

Consultation Response.

Ofgem Proposals for regulating non-domestic Third Party Intermediaries (TPIs)

Question 1:

Do you agree with the definition of TPIs? Please provide any suggestions along with supporting information.

Inteb would generally agree with the overview of TPI's however, we feel all energy related services should be included under the scope of the code of practice to make it comprehensive.

Question 2:

Do you agree with our list of proposed TPIs that could be covered by any regulation we introduce?

Yes, but with some additions such as organisations offering bill validation, metering etc

Question 3: What types of organisations should be exempt from our TPI scope definition and why?

None

Question 4: Do you agree with our recommended option for regulating non-domestic TPIs?

Inteb agrees with the recommended option 3 as we feel there needs to be a method of weeding out the unscrupulous TPI's and protecting the customer. By imposing restrictions to Suppliers only dealing with accredited TPI's it will ensure that TPI's operate to a certain standard. We believe that all TPI's should be required to divulge their pricing strategy to clients and provide a transparent fee structure so clients are aware of the services they are to receive for the fee paid. There are TPI's who lead / allow customers to believe they are offering a 'free' service which does not exist

Question 5: Do you agree with our proposed governance recommendations?

Inteb does agree there needs to be an independent body to oversee the code of practice and ensure TPI's operate in accordance with it. However, we recognise this will need to be policed effectively and TPI's found to be underperforming monitored to ensure they adopt the necessary practices and procedures with the removal of accreditation if they are unable to meet the required standard.

Question 6: Please provide your views on the appropriate representation for members of the proposed independent code board.

Members would need to be representative of all parties involved and this would seem to be a good solution to ensure a fair input for all.

Question 7: Do you agree that there is scope for improving complaints monitoring and information sharing? Do you have any further views?

Each TPI should have a robust procedure for recording the processing complaints received and how they have been resolved which could be inspected by the regulatory body at their discretion.