

Bart Schoonbaert
Ofgem Consumer Policy
9 Millbank
London
SW1P 3GE

14 February 2014

Dear Mr. Schoonbaert,

Consumer Empowerment and Protection in Smarter Markets – The Co-operative Energy consultation response

At Co-operative Energy we welcome the opportunity to respond to your consultation on Consumer Empowerment and Protection in Smarter Markets.

We have responded to each of your consultation questions on the following page, but in summary, we believe that the proposed work programme, building on Ofgem and DECC's previous work in this area, will deliver its stated aims.

Yours faithfully,

Chris Hill

Head of Policy



Annex A – consultation responses

	Consultation questions	Our response
1	Do you agree with our approach to micro-businesses?	We support this proposal and feel that implementation will have a minimal impact on our current portfolio.
2	Do you agree with the focus areas we identified?	We agree that suitable and comprehensive focus areas have been identified.
3	Do you agree with the objectives we set out?	We support this proposal. We agree that the objectives are focused on realising consumer benefit, consumer empowerment and protection yet are mindful of regulatory barriers which may need to be addressed in due course. However, we would request that clear direction is provided in relation to crossover points between RMR and new smart tariffs to support a medium term “smarter” customer environment using multi rate time of use tariffs as envisaged in the RMR tariff rules.
4	Do you agree with the proposed phasing of work, or do you think some areas should be brought forward or pushed back?	We support this proposal but would request that some background clarity on key principles is given in relation to provision of data and information during Phase 1 with links to data security principles such as ISO/CREST and future audit requirements. This will then provide a robust foundation to be built on during Phase 2.
5	Do you think we have missed any areas to focus on? When do you think we should address these?	We believe that developments in the mechanics around the change of supplier process resulting from the new DCC environment and associated issues will be a key issue for Phase 2.



	Consultation questions	Our response
6	How would you like to engage with us through this work?	We agree with Ofgem's approach to supplier engagement with the work programme although we believe that face to face industry briefings prior to implementation of the proposed changes would also be useful.

