

**Question 1:**

**Do you agree with our summary of the current domestic TPI landscape? In the light of recent developments in TPI services, are there other important factors we should be taking into account?**

Ans: **Yes, we agree with the current landscape.**

**Question 2:**

**Does the definition exclude services you would expect to be covered? If so, how might it be adjusted to accommodate them?**

Ans: **This doesn't exclude any services.**

**Question 3:**

**Would this definition include services you would not expect in light of our TPI vision? Why do you think these services should be excluded?**

Ans: **We agree on all services that have been included to date.**

**Question 4:**

**Do you agree that domestic intermediaries should provide an independent, transparent, accurate and reliable service to their customers?**

Ans: **Yes we agree. This is vital for consumers, and the current measures that are in place are to ensure we provide this.**

**Question 5:**

**Are you aware of potential challenges for particular types of TPI models in embedding any of the principles? How might these challenges be addressed?**

Ans: **The recent introduction on Exit Zones, as discussed on the recent call. This has not been introduced properly by the Suppliers directly. We also seek clarification if this is a benefit to the consumer.**

**Question 6:**

**We have identified information exchange and face-to-face services as priority areas for our consideration. Are there other areas you think we should be focusing on in the near future?**

Ans: **Improve correspondence between all parties, Suppliers/Ofgem and TPI'S. Especially introduction of new Suppliers.**

**Question 7:**

**Are you aware of barriers to effective information exchange between suppliers and TPIs which impact on services to consumers? If so, how might these barriers be addressed?**

Ans: As reply on question 6 – to be able to provide up to date and fair information then more correspondence is needed.

**Question 8: What further steps do you think we should take to facilitate face-to-face services, particularly to support engagement with more vulnerable or harder -to-reach consumer groups?**

Ans: We believe that if a TPI is to provide Face-to-Face services, the TPI must be responsible to provide the relevant tools and devices to be able to provide the consumer with an accurate representation across all suppliers to ensure a correct and accurate comparison. The consumer should be able to complete this application in person or be able to receive correspondence, possible email, from the TPI to enable them to confirm they have been provided a fair comparison and happy to progress with the application.

**Question 9:**

**What are your views on our proposal to increase the transparency of sites' commission arrangements with suppliers and the impact this has on the results a consumer will see?**

Ans: Our view is consumers should not see commission arrangements, as discussed on the recent call.

**Question 10:**

**Do you agree that sites should direct consumers to the sources of independent advice identified? Are there other sources you would suggest?**

Ans: We agree - and have implementations in place to show be able to display these sources.

**Question 11:**

**Do current requirements (within the Code or more widely) or supplier practices put unnecessary restrictions on sites' business models? If so, what changes could be made to allow greater flexibility?**

Ans: No – as our platforms are advised via Ofgem and the suppliers to display the correct sources/products.

**Question 12:**

**Should there be a central repository of information for prepayment**

**Customers? Who should fill this role? And in what way could sites facilitate the provision of this information to consumers?**

Ans: We agree, and the suppliers should facilitate this and provide the necessary information for TPI's.

**Question 13:**

**What timeframe would you propose for implementing our proposals in relation to site independence?**

Ans: This should be implemented in shortest timeframe, for the benefit of the consumer.

**Question 14:**

**Do you agree with our proposal to increase consumer awareness of the availability of whole of market comparisons? Are there better alternatives?**

Ans: We agree – we would like clear comparisons for the consumers.

**Question 15:**

**Do you agree with our proposal to allow sites to compile their own supplier ratings? Are there factors other than those set out that sites should consider when formulating their ratings methodology?**

Ans: No – we do not agree with this. We would prefer this to come from authorised agencies such as Defaqto. We feel this will provide fairer information to consumer.

**Question 16:**

**Do you think there is benefit in exploring further the criteria for filtering or categorising green and environmental tariffs on comparison sites? Do you have suggestions for the best way to define these criteria?**

Ans: This can be of benefit, for example on results page – this option should be available as an alternative feature from suppliers, should they accommodate this.

**Question 17:**

**What timeframe would you propose for implementing our proposals in Relation to site transparency?**

Ans: We believe that your proposals should be implemented no more than a 3 month period to allow more consultation.

**Question 18:**

**Do you agree with our proposal for sites to use the Personal Projection methodology when calculating the cost of a tariff?**

Ans: Yes. We agree as this allows the consumer to understand their potential personal projection accurately.

**Question 19:**

**Do you agree with our proposal to require sites to display a Tariff Information Label for each of the tariffs on their site?**

Ans: We agree, and have implemented per requirements.

**Question 20:**

**Should we seek to ensure consistency of tariff cost results across the industry? Or should we allow room for suppliers and TPIs to differentiate by adopting their own methodologies?**

Ans: We would prefer for Ofgem to seek consistency of tariff costs results/methodologies.

**Question 21:**

**What timeframe would you propose for implementing our proposals in relation to site accuracy?**

Ans: We would seek this immediately – given the accurate consultancy.

**Question 22:**

**Do you agree that we should introduce principles from the complaints handling standards into the Code? Are these the right principles to introduce?**

Ans: Simply Switch agrees with this. As this would provide the same methods across all TPI's.

**Question 23:**

**Do you support our proposal to introduce messaging and links to Warm Home Discount information as a requirement of the Code? Do you have specific views regarding where and how this information should be presented to consumers?**

Ans: We should provide this information to the consumer. We would see this on a specific page, relating to additional benefits.

**Question 24:**

**Do you agree that we should set up a working group to discuss site accessibility guidelines?**

Ans: **We agree with this.**

**Question 25:**

**What timeframe would you propose for implementing our proposals in relation to site reliability?**

Ans: **We would seek this immediately, given the accurate consultancy.**

**Question 26:**

**Do you agree with our proposals to allow a broader range of comparison sites to become accredited under the Code?**

**We feel there needs to be more consultancies between all current accredited TPI's and Ofgem, as 7.1 to 7.15 do not adequately provide an indication as to what benefits this will be for the current sites, especially that currently runs all database/engines. Keen to discuss this in further meetings.**

**Question 27:**

**What challenges and benefits do you envisage if we were to expand the Code to cover mobile apps? And follow-up prompt services?**

**Mobile app can work – we feel as long as the data is provided only by the accredited site and not via white label. Current 11 sites should only have this facility.**

**Question 28:**

**Do you have suggestions as to how best to increase awareness of the Code among consumers?**

Ans: **For Ofgem to provide more information for accredited websites to display about this authority.**

**Question 29:**

**Do you agree that we should appoint a single auditor and pass through the costs to sites? Are there better alternatives for achieving this?**

Ans: **Depending on the outcome of question 26 – we feel this is open for discussion.**

**Question 30:**

**Do you agree with the proposed changes to the Code audit enforcement and compliance, and change processes?**

Ans: Yes we do agree, now Ofgem are creating their own establishments and methods, to move away from consumer focus's implementations and make their own processes for all accredited websites.