

The voice of the energy industry

Ruben Pastor-Vicedo Ofgem 9 Millbank London SW1P 3GE

Sent via e-mail: white.labels@ofgem.gov.uk

6 November 2014

Treatment of white label providers in the domestic retail market

Dear Ruben.

Energy UK is the trade association for the energy industry. Energy UK has over 80 companies as members that together cover the broad range of energy providers and supplies and include companies of all sizes working in all forms of gas and electricity supply and energy networks. Energy UK members generate more than 90% of UK electricity, provide light and heat to some 26 million homes and last year invested £10billion in the British economy.

Energy UK welcomes the opportunity to respond to Ofgem's consultation. Energy UK's membership is varied, and includes suppliers who have white label relationships and those who do not. Energy UK is therefore not able to comment on the tariff aspects of the proposals, the commercial implications of which vary significantly across the retail supply spectrum.

This response considers appropriate due process Ofgem should follow as it seeks to agree a new regulatory framework for white labels and their backing suppliers, and the timeframes associated with further work and implementation.

Use of evidence

Ofgem should ensure that any proposals it puts forward are properly evidenced based to ensure they are beneficial to the market.

Timescales

Ofgem should ensure it provides appropriate timeframes as its proposals develop in order to allow suppliers to plan for and implement any required changes, such as those to billing systems. The extent of the final requirements will naturally dictate the implementation timeframe; a more extensive requirement will of course need longer. This should be considered in light of the number of incoming Ofgem and DECC policies relating to billing and billing information which suppliers need to manage to ensure they are compliant, for instance QR Codes, Energy Efficiency Directive requirements and potentially midata.

Any proposals should be sensitive to delivering good customer service and avoid suppliers having to rush through system or process changes.

Information on the value of white labels



The voice of the energy industry

Energy UK members seek clarity on the benefits Ofgem would expect to result from providing white label customers with customer service KPIs - over and above the information customers already receive from suppliers.

I hope you find these comments useful.

If you have any questions, please do not hesitate to contact me on 020 7747 2963 or daisy.cross@energy-uk.org.uk

Yours sincerely

Daisy Cross Policy and External Relations Executive