

Jonathan Blagrove
Ofgem
9 Millbank
London, SW1P 3GE

Ecotricity Group Ltd
Lion House
Rowcroft
Stroud
GL5 3AZ

12th February 2015
Ecotricity Reference No.: 466
emma.cook@ecotricity.co.uk

Ecotricity Response to Statutory Consultation to proposed modifications to the Debt Assignment Protocol

Dear Mr Blagrove

Introduction

Ecotricity is a renewable energy generator and supplier with over 155,000 customer accounts and 71MWh generating capacity across the UK. We pride ourselves on the professional, transparent and personalised service that we offer, which is consistently recognised by our customers and third party surveys. For example, we have recently topped the Which? Energy Customer Satisfaction Survey for the second year running. This recognises our transparency and focus on the ethical treatment of our customers. We support any measures that aim at improving transparency for consumers and simplify the industry.

The Debt Assignment Protocol is a measure we, as a small supplier, have been keen to use wherever possible. Our prepayment customers make up almost twenty percent of our customer base. We recognise that they are often the most vulnerable consumers and the Protocol offers them a method of finding the cheapest possible tariff.

We support the proposed changes; however, we believe that additional amendments to the data transfer process are needed. It is apparent that different suppliers hold varying mechanisms and processes for operating the Protocol and therefore any modifications that support standardisation and simplification of the process are welcome. We have attempted many switches where delay has been caused either by miscommunication between suppliers or a lack of vital data within the flows. For example; a supplier first receives the customer's estimated debt. Later in the exchange of flows, the supplier receives the customer's actual debt. The estimated debt can be below the threshold, therefore the supplier accepts the

transfer. However the actual debt may be above the threshold, ultimately leading to an erroneous transfer. This can be frustrating for consumers, where no supplier is at fault.

Question 1: Do you agree with our proposal to amend SLC 14.6 and increase the Debt Assignment Protocol debt threshold to £500 to reflect the current voluntary practice?

We support the amendment to increase the threshold to £500. This removes any ambiguity for suppliers understanding of their obligations and improves consumers' understanding of their entitlement.

As a small supplier we have been using the mandatory threshold of £200; however, we see no reason that any supplier should be unable to adopt the increased threshold of £500.

Question 2: Do you have any comments on the changes we are proposing to make to the Social Obligation reporting requirements?

Similarly we welcome any simplification to the Social Obligations reporting. We value Ofgem's focus on reducing any regulatory burden where possible. This reduces the administrative burden for suppliers whilst the data remains just as valuable for the benefit of consumers.

Simplifying data to distinguish only between those indebted with >£500 or <£500 successfully reflects the increased threshold and the previous process would hold little value. We are committed to following the Point of Acquisition Model at the start of the reporting period.

Conclusion

In conclusion we support the proposed changes to the Debt Assignment Protocol and believe that they will have the intended benefits. However, there is more work to be done to simplify the process, minimising the information required by suppliers and ensuring as simple a switch as possible for consumers.

We also welcome any further contact in response to this submission. Please contact Ryan Wilkins on 01453 769392 or ryan.wilkins@ecotricity.co.uk.

Yours sincerely,



Emma Cook
Head of Regulation, Compliance & Projects.