



Domestic Retail Market Policy (c/o Adhir Ramdarshan)  
Ofgem  
9 Millbank  
London  
SW1 3GE

By email: [white.labels@ofgem.gov.uk](mailto:white.labels@ofgem.gov.uk)

**Thursday 19 March 2015**

Dear Sirs

**Final proposals on the treatment of white label providers in the domestic retail market**

Thank you for the opportunity to comment on the above consultation response. We are broadly supportive of the changes proposed, although we do have some concerns about the negative effect that the revised definition for white labels will have when seen in conjunction with the requirement regarding the wide CTM calculation – see our response to Question 2 below.

Our responses to the questions posed are as follows.

**Question 1**

***Do you think the implementation date of our proposals is appropriate? If not, please explain your reasoning, suggest an alternative implementation date and provide evidence to support it.***

As we currently do not have any white labels we have no issue with the implementation date.

**Question 2**

***Do you agree that the amendment to the white label definition captures the policy intent of our proposals? If not, please explain your reasoning.***

While we agree that the amendment to the white label definition reflects Ofgem's policy intent, the consequences of this amendment are likely to lead to

**E.ON Energy Solutions Limited**  
Newstead Court  
Little Oak Drive  
Sherwood Park  
Annesley  
Nottinghamshire  
NG15 0DR  
[eonenergy.com](http://eonenergy.com)

Jill Laurie  
M 07766 997484  
[jill.laurie@eonenergy.com](mailto:jill.laurie@eonenergy.com)

E.ON Energy Solutions Limited  
Registered in  
England and Wales  
No 3407430

Registered Office:  
Westwood Way  
Westwood Business Park  
Coventry CV4 8LG

further confusion and frustration for consumers. Customers of a partner supplier who are advised that the cheapest tariff for them is a white label tariff are likely to contact the partner supplier for more information about that tariff. However, the partner supplier will be obliged to turn the consumer away, as any indication by the partner supplier about how to access the tariff could be interpreted as marketing.

Providing contact information for the white label within the wide CTM message could be considered as 'communicating with Domestic Customers for the purpose of promoting the tariff to them.' We therefore recommend that 31D.23 be amended to require or permit a partner supplier to provide a url and telephone number so that customers can contact the white label provider directly, thereby preventing the partner supplier from being considered as marketing the white label tariff and providing a better experience for consumers.

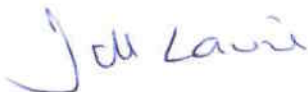
**Question 3**

***Do you have any comments on our proposed supply licence condition changes in the supplementary appendices?***

We have no comments other than as raised in our response to Question 2.

If you require any further information from us or require clarification about this response, please do not hesitate to contact me using the contact details above right.

Yours sincerely



Jill Laurie  
Regulatory Executive