

Ofgem  
9 Millbank  
London  
SW1P 3GE  
[DomesticRetailPolicy@ofgem.gov.uk](mailto:DomesticRetailPolicy@ofgem.gov.uk)

Ecotricity Group Ltd  
Lion House  
Rowcroft  
Stroud  
GL5 3BY

Ecotricity Reference number: 631  
18<sup>th</sup> November 2016  
[Alan.Chambers@ecotricity.co.uk](mailto:Alan.Chambers@ecotricity.co.uk)  
01453 761380

## **Ecotricity Response to the Consultation on the introduction of SLC32A: Power to direct suppliers to test consumer engagement measures**

Dear Sirs,

Ecotricity is an independent renewable energy generator and supplier, with around 190,000 gas and electricity customers. At Ecotricity, we have three principal attractions: the greenest energy with the emphasis on investing in new sources of renewable energy; the best customer service as demonstrated by the lowest level of complaints in the industry; and an ethical pricing policy that means every customer gets our best price, regardless of payment method. It is this focus on ethics and principles of excellent customer service that's key to our growth.

We welcome the opportunity to comment on Ofgem's proposed trials to test consumer engagement measures, and offer our views below:

### **Supplier Choice**

Although we disagree with a number of Ofgem's proposed remedies for engaging consumers, namely the disengaged consumer database, we would prefer to see any mechanisms adequately tested prior to their implementation. We therefore broadly support the use of trials in order to test consumer engagement measures in general.

We also support Ofgem in that any supplier choice should be fair, reasonable and appropriate. However, we feel this should go further, with supplier selection taking into account the nature – not just size – of the supplier's customer base. For example, if customers have selected their supplier for environmental credentials, any trial should be reflective of this.

## Supplier Capability

In order to be successful, it is vital that trials are not unnecessarily burdensome or detrimental to either supplier or customer. Capacity to carry out trials will vary greatly amongst suppliers, with new and independent suppliers unlikely to have the capability to carry out large scale or complex trials. A considered approach will be required in order to ensure selection is proportionate and suitable.

We also hope that Ofgem will allow for flexibility in the timeframe by which they expect a supplier to commence a trial. A one month time period could be unduly onerous – particularly on smaller suppliers – and Ofgem must acknowledge that more complex trials could go beyond the specified time period. If a timeframe is strictly maintained, this risks either: a supplier breaching the licence conditions, or; a trial being pushed through in a rushed manner in order to meet the deadline, providing skewed results.

## Confidentiality

We would also appreciate further information on the level of detail that any published results would go into. In particular, whether any findings from a trial would be treated as confidential and not shared amongst industry. It seems unfair on a selected supplier to put in extensive resource, only to see their work shared amongst industry for seemingly little benefit. Equally, it does not seem logical to withhold any findings.

Ecotricity welcomes the opportunity to respond and hope you take our comments on board. We also welcome any further contact in response to this submission. Please contact James Jackson on 01453 840618 or [james.jackson@ecotricity.co.uk](mailto:james.jackson@ecotricity.co.uk).

Yours sincerely,



Alan Chambers  
Acting Compliance Officer