

Caroline Ainslie
Consumers & Competition Senior Manager
OFGEM
9 Millbank
London
SW1P 3GE

Monday 26th September 2016
via Email to: confidencecode@ofgem.gov.uk

Dear Caroline,

Thank you for the opportunity to review the open consultation with regards to the review of the TPI Code of Confidence. To assist with responding to the consultation we have laid out our position against the questions posed within the chapter summaries.

Q1. Do you agree that we should implement the proposed removal of some of the changes we made to strengthen the WoM requirement in the 2015 Code review?

AND

Q2. With reference to Table 2, do you agree with our rationale and proposed policy changes around the partial default view?

Good Energy has concerns about the removal of the Whole of Markets (WoM) requirement from Price Comparison Websites. Currently consumers can select a whole of market view and also a view on those deals only offered by those suppliers that PCW's have a commission relationship with. This is clear, transparent and fair, aligning to Standards of Conduct SLC25C.

By only offering a partial view, consumers may see a distorted representation of the market offerings via the PCW they are visiting. To get a broader view on the market, consumers would need to visit a number of other sites to make comparisons and to be in a position that they can make an informed decision on the best deal for them with an energy company that meets their needs. This may result in further disengaged consumers when they are unable to find a fair comparison.

To ensure consumers do have fair view of suppliers we would welcome either:

- (a) PCW offering a whole of market view via a filtered search facility or
- (b) PCW could offer a partial (unfiltered) view but clearly sign post that the Citizen's Advice service offer a WoM impartial view
- (c) Remove the WoM view but limit the number of tariffs a supplier can promote or advertise to ensure they are unable to dominate the first page



Q3. Question 3: With reference to Table 2, do you agree with our rationale and proposed policy changes around the WoM filter choice?

AND

Q4. Question 4: With reference to Table 2, do you agree with our rationale and proposed policy changes around the WoM filter wording/testing?

We believe Whole of Markets (WoM) requirement for PCWs, plus the Citizen's advice site, currently provide customers with the ability to accurately and easily compare offers presented to them across the whole of the market. We feel that consumers should have the option to choose between a WoM and a partial view. We do not agree that consumers should be presented a partial view as default.

Q5. Do you agree that sites should test the prominence, clarity and intelligibility of their messaging with consumers and that Ofgem should monitor this?

We do agree that testing will ensure PCW messaging is clear and can be understood by the consumer, avoiding any confusion; ensuring consumers are not misled in anyway. As PCW's are OFGEM accredited we would expect their messaging to be monitored to meet the same high standards that suppliers have to achieve under the Standards of Conduct (SoC) (Plain and intelligible language which is transparent, honest and in a prominent position).

Q6. With reference to Table 3, do you agree that the proposed Code wording reflects our proposals?

We believe that a PCW that has arranged a specific deal with a supplier should not have to be displayed on any other PCW and we do not agree that consumers should be presented a partial view as default.

Q7. Do you agree with our rationale and proposed policy changes around the removal of Personal Projection?

AND

Q.8 Do you agree with our rationale, and proposed policy changes about including the pre-2015 code content on factors an accredited price comparison website should and should not include when deriving a consumer's estimated annual costs?

It is important for all PCW to use the same methodology on product comparability across PCW and suppliers so customers can compare across sites on a like for like basis. Any changes to this methodology need to be consistently adopted across all PCW.



Q9. With reference to Table 4, do you agree that the proposed Code wording reflects our proposals?

We believe that personal projections should remain. They show a clear comparison between an existing tariff a consumer is on and a competing tariff that they can switch to.

A PCW should not include introductory sign up's/special offers as part of these core calculations as this could make deals harder to initially assess. Any offers should be considered once a consumer has compared the base tariffs.

Recurring discounts that are paid automatically (e.g. monthly debit card) should remain as part of the core calculation as they are part of the plan which a customer may sign up to.

Q10. Do you agree with our assessment that no changes are required to the TIL references within the Code?

We do not believe that changes to the code are required. We do not feel that assumed average consumption and cost should be removed from the TIL. However, TCR is not that meaningful to customers so this could be removed.

We are supportive of changing the format of the TIL. It needs to be flexible to accommodate the recent changes e.g. to include bundles, special offers and discounts.

Q11. Do you agree that these initiatives are out of scope for this review and that we should monitor their progress to be aware of potential impacts in the future of these initiatives?

AND

Q12. Do you believe there are any other initiatives we should be keeping abreast of to ensure a joined-up approach to our policy development work?

We do believe that access to ECOES and DES, Midata Smart Metering, Half Hourly Settlement are out of scope for this review. However all are important industry developments and a joined-up approach to our policy development work is required. Quality, handling and use of data is particularly important if PCW's are provided access to ECOES and DES.

We look forward to your response to this consultation in due course.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Peter Berry', with a horizontal line underneath.

Peter Berry
Senior Compliance Manager
Good Energy
