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Dear Caroline

Confidence Code Review 2016

Thank you for the opportunity to respond to the consultation on the Confidence Code Review.

SSE is broadly in favour of the proposed changes. This will be reflected in the answers to the individual questions you have provided. These also give information as to how we arrived at this position but also where our thoughts deviate from the proposals too.

Question 1: 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?

Yes – there has been some good indication of why some measures of the 2015 Code Review have impacted the viability of TPI activity in the energy industry. This has included a reduction in incentives to negotiate exclusive deals and a reduction in acquisitions.

However, there should be consideration of customers still being able to clearly understand results and this looks to be achieved with the remaining requirements to describe the results being presented.

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

Yes – sites being better able to innovate will help present more options for customers around different tariff features such as rewards and customer service performance.

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

Yes – as with the default view issue, leaving this with comparison sites allows them to differentiate themselves and present different and improved propositions.

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

SSE is supportive of the rationale and proposed changes. The desired result should be a comparable journey across different sites and a clear understanding of the results being provided.

Question 5: Do you agree that sites should test the prominence, clarity and intelligibility of their messaging with consumers and that Ofgem should monitor this?

It is important that any lack of clarity in the messaging being used is not exploited and has resulting customer detriment. With this in mind, SSE believes it would be proportionate to apply Standards of Conduct as is done with suppliers. This would produce consistent treatment towards customers'.

Question 6: With reference to Table 3, do you agree that the proposed Code wording reflects our proposals?

and,

Question 7: Do you agree with our rationale, and proposed policy changes around the removal of Personal Projection?

Yes, SSE agrees with both of these intentions. The proposed Code wording appears responsive enough to any further developments on the matter of providing personal projections.

Question 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?



Yes – pre-2015 wording remains applicable in light of the proposed changes.

Question 9: With reference to Table 4, do you agree that the proposed Code wording reflects our proposals?

Yes – the proposed wording requires the appropriate responsibility to provide sufficient explanation of how the costs are calculated. This is important in supporting customers understanding the results being shown which then assists them making a well informed decision.

Question 10: Do you agree with our assessment that no changes are required to the TIL references within the Code?

Yes – the TIL should be useful for providing additional continuity across searches and in a recognisable format.

Question 11: 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

Question 12: 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?

SSE would expect a more joined up approach to ensure that there is maximum benefit to the customer experience. Access to ECOES and DES in particular has clear benefits that would enhance the customer journey and add certainty to the switching process.

Smart metering should also be brought closer to this work area since the technology and the data being retrieved could enhance the process of comparing tariffs and suppliers.

I hope these comments prove useful as part of your review but please let me know if I can be any further assistance.

Kind regards

Josh Henderson
Regulation Analyst