

Xander Fare
Ofgem
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Canary Wharf
London
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30th May 2018

By email: CDconsultations@ofgem.gov.uk

Dear Xander,

Thank you for the opportunity to comment on the consultation to remove the Whole of Market (WoM) requirement from the Confidence Code. Our response is not confidential.

Centrica continues to support Ofgem implementing CMA recommendations on rules around Price Comparison Websites and sees the proposed reform to the Confidence Code as a positive change to increase competition in the market.

While we agree that the proposed drafting of the Code should achieve the proposed policy intent, we found the new requirement 10 difficult to follow as it only refers to conditions that do or do not apply when Wide Results are not shown. It would be easier to have the new drafting subsumed into the current requirements, so that the reader can see in one place what applies when WoM is shown and what applies when it isn't shown.

In addition, requirement 7(N) has been changed to include 'updated tariffs', when currently Confidence Code requirement 7(N) only refers to 'new tariffs'. It is unclear to us why requirement 7(N) to include new or updated tariffs no earlier than six weeks before they become available to customers only applies when not displaying Wide results.

Finally, we noticed that the legal drafting of requirement 10 has changed in the version on Ofgem's website since the consultation release. Requirement 10(B), relating to requirement 1, has been taken out and the remaining requirements have moved up. While we agree that clauses relating to requirement 1 were unnecessary, we would have expected to see a notification from Ofgem about the changes before the responses to the consultation are due.

If you have any questions about our response, please do not hesitate to contact Justina Miltienyte on 07557 615 743 or on Justina.miltienyte@centrica.com.

Yours sincerely,

Alun Rees

Director, Retail Market Policy

Centrica