



Name Paul Finch
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30th May 2018

Dear Xander,

Implementation of the CMA's Whole of Market Recommendation

I am pleased to respond on behalf of the gas and electricity supply licensees within the Npower Group PLC.

npower believes that price comparison websites (PCWs) play an important role in helping domestic customers to make informed decisions about switching energy supplier. PCWs have an important part to play in fostering trust in the functioning of the energy market as a whole, by ensuring that they are transparent in all their dealings with consumers. As indicated by Ofgem's trial evidence, we firmly believe that the removal of the WoM requirement should enhance the incentives for commercial PCWs to compete to develop better offers to consumers. It should stimulate competition both in terms of price and product innovation within the domestic retail energy market. Accordingly, we urge Ofgem to implement this change without further delay.

In response to your specific questions:

- ***Do you agree that our minded-to option is the best means of achieving the benefits and mitigating the risks of removing the WoM requirement?*** Yes, we agree this option is likely to be the best way of ensuring customers see a wide choice of competitive tariffs, whilst also having access to the WOM via the CAB link.
- ***Do you agree that our proposed drafting of the Code is the best means of achieving the benefits and mitigating the risks of removing the WoM requirement?*** Yes, the drafting of the code will ensure it's fit for purpose in a market that has c70 active domestic suppliers.

More generally, we note that Ofgem may treat non-compliance as a serious breach of the Code (with potential removal of accreditation). We remain of the view that customers would be afforded greater protection by Ofgem regulating PCWs directly rather than vicariously through the supply licence. This could include a set of directly enforceable principles, similar to Standards of Conduct (conduct, transparency, customer detriment, etc). The scope for individual suppliers to influence PCW processes is limited.

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This response is not confidential.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Paul Finch', written in a cursive style.

Paul Finch
Regulation

Cc: Chris Harris, Head of Regulation