



## **TMA Response to Ofgem's consultation on framework to assess domestic market competition.**

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| Ofgem Consultation on framework to assess domestic market competition |                  |
| TMA Data Management Ltd   | Date: 28/06/2019 |
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## 1. Introduction

TMA started as a Consultancy and Boutique developer in 1987. Following the Electricity competitive Market opening in 1998 we provided IS and IT solutions for larger Suppliers. We qualified as a Party Agent in 2005. We now provide Half Hourly and Non Half Hourly Data Collection, Data Aggregation, AMR, Data Retrieval and Internet services to over 20 Suppliers and other market participants. We also provide DCC Services for Smart in order to ensure that the DCC services are accessible to all Suppliers and other interested parties through Shared Services.

We welcome the opportunity to respond to Ofgem's consultation on framework to assess domestic market competition.

### **Q1 Are there any features of effective competition that are not covered in our definition?**

We agree with the features of effective competition as listed in the consultation paper i.e. Independent rivalry across suppliers to provide innovative products that meet the needs of consumers as well as good customers' outcomes. We are supportive of not just including price indicators but also the ease with which a customer can reliably change Supplier.

### **Q2 What are your views on the conditions for effective competition we have proposed? Are they clear and is there anything else you think we should take into account?**

We agree with Ofgem's views in the conditions for effective competition. Structural changes should support competition, the competitive process should work well without the price cap. We are not supportive of the price cap, the necessity to have a price cap is a confirmation that the competitive process is not working and can only be very temporary action.

### **Q3 What are your views on the structural changes that we propose to include in our framework? Are there any specific changes you think we should consider?**

We support the structural changes to be included in the framework, namely Smart Metering, CMA remedies, Ofgem led programmes and Future Energy Retail market review. We would like to ensure that Innovation link is part of the Ofgem led programmes as it is not listed in the consultation document.

### **Q4 Are there any indicators of the competitive process not listed here that you think we should consider in our analysis?**

No. We support Ofgem in not setting specific threshold for the various indicators.

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The overall picture will be more telling than specific threshold for each indicator.

**Q5 What are your views on the consumer outcomes that we propose to assess in determining whether the conditions are in place for effective competition?**

We agree with the 5 customers' outcomes Price and price differentials, Quality of service, Tariff choice, Switching process and Trust and confidence.

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**Q6 Is there any other aspect of effective competition that the framework should consider?**

No.

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