

Dear Sirs,

Thank you for including us within your consultation of the Ongoing Requirements and Exit Arrangements for Licenced Energy Suppliers.

Whilst a small supplier we appreciate having the ability to share our views. As feedback the consultation was well written, clear and the process is straight forward. We feel that Ofgem have the best intentions of the consumer in mind throughout. We also feel that the consultation is fair and balanced for supplier parties.

With this in mind the comments we would like you to consider are below.

## **1. Protecting Customer Credit Balances**

If not already, we would like you to consider:

- A customer credit balance may be as a result of an in-accurate reading or a SAR requirement, therefore we could be protecting balances of credits which are not actually valid. We assume this is why you have chosen 50% of credit balances.
- Should we consider balances which are in debit, therefore offset this against credits before protecting 50%? At any one point we have money owed as well as money due. If we are insuring against an amount we need to be clear on the criteria.
- We believe a range of protection suitable from parent guarantees, bank guarantees and insurance. However, we believe that there should be some guidelines of the types of insurance and the companies suppliers should use. Insurance policies can vary and we would hope that there is a consistent approach from suppliers. We would prefer it is Ofgem recommended specific policies for suppliers to choose from streamlining the process and making it a more trusted means of protection for the SoLR

## **2. Audits and Reporting**

Whilst we encourage additional requirements for consumer protection, we trust that such audits and reports do not detract from the main purpose of serving our customers. Annual reporting for smaller suppliers, in our view, is sufficient. We accept that larger scale customer numbers should require further reporting requirements throughout the year.

We would hope that these new arrangements do not block innovation and start up suppliers. We have worked diligently for 24 months to build the appropriate systems, processes and staff to service our customers. This takes time and we would hope that Ofgem understand and do not penalise or hold

back growth. If Ofgem created basic principles to adhere to then we agree that they should be met, but we don't want Ofgem to limit small private businesses who have stable growth plans.

Thanks again for contacting us.

With Regards

Carl Fisher  
Managing Director

