From: Energy [mailto:energy@sudburycab.org.uk]
Sent: 03 August 2016 14:54
To: Confidencecode <<u>confidencecode@ofgem.gov.uk</u>>
Subject: Price comparison websites

I am concerned that the changes proposed by the CMA will reduce competition and choice for consumers using comparison websites.

I work with more vulnerable consumers at Sudbury Citizens Advice Bureau. I use comparison sites on their behalf so I am familiar with the way they operate. When I give talks to groups on energy saving I encourage them to use these sites to get a better deal but I find many consumers, particularly if older and less computer-literate, find them complicated and daunting. To show them only a partial selection of tariffs for which the site has special deals will result in many such consumers not realising that there may be better deals available in the whole market. This practice was stopped by Ofgem previously precisely because of this problem. Sites already have the option not to seek Ofgem accreditation and only show selected tariffs. I believe that accredited sites should open by displaying an explicit choice between whole of market tariffs or special deals only with an ability to change the choice while exploring the site.

The CMA also proposed that sites should be permitted to exclude energy companies and tariffs for which do not receive commission. This would result in the large established energy companies being able to prevent new, smaller companies establishing a foothold in the market by paying larger commissions than new companies could afford. This would be profoundly anti-competitive and unfair. It would kill off the better market that is now developing thanks to innovative organisations such as social enterprise and municipality-owned companies.

Julian Fasler



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