

Representation - Draft Modification Report 0593V

Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries

Responses invited by: **5pm on 08 September 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Rachael Gladwin
Organisation:	Utilities Intermediaries Association
Date of Representation:	8 th September 2017
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

The provision of timely data which will facilitate the switching process and minimise errors, resulting in reduced cost to serve for TPI/PCW and satisfactory outcome for the consumer.

A clear process for monitoring and compliance, alongside the requirement on all PCW/TPI's to enter into agreement with the CDSP (as a neutral party) should prevent any possible misuse of data.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

Should be implemented as soon as reasonably practicable after Authority consent

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

Costs for access to data for PCWs/TPIs is an unknown.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Modification Panel Members have requested that the following questions are addressed:

Q1: To inform Panel's consideration of the varied modification, views are requested as to whether you agree that Ofgem's sendback questions have been addressed in the revised modification.

Yes

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

The UIA support the API solution with its core principles and conditions but we would welcome further consideration on extending the scope of this arrangement to cover business sectors, in particular micro-business consumers, who the CMA acknowledged, exhibit similar behaviours and suffer similar outcomes as a consequence of Weak Customer Response. That switching has not been perceived by the CMA as a barrier outside of the domestic sector could be attributable to the fact that some commercial TPI's already have access to this information either via agreement with a supplier, as in the case of ECOES, or via other means in the case of DES. The UIA would welcome a move to create a level playing field for TPI's, where access is not determined by a supplier's "permission", but granted on the basis of a customer's consent, with strict compliance procedures, similar to those set out in this modification. We hope that the development of a centralised switching service managed and run by a single entity will facilitate this objective at some future date.

The UIA asks for the inclusion within the modification under audits, that any measures taken will clearly be for the benefit of the customer and for no other purpose.

Please provide below any additional analysis or information to support your representation