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Question 1. What are your views on the suitability of the scope of coverage for these measures applying to small business defined as annual consumption of 0-50MWh for small Industrial and Commercial (I&C) electricity customers and 0-73.2MWh for small I&C gas customers?

All non-domestic customers need to have access to redress protocols afforded by the Regulator and others

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Question 2a. Should suppliers be mandated to provide transparent price information for small businesses on their website? If so, please describe what format should this take? Please provide a clear rationale to support your answer.

2b. If yes, how do you suggest that this measure should be implemented? (For example, licence requirement / Code of Practice / guidance document).

2c. Do you think that this required pricing information should include standing charges, unit rates and all other associated charges per electricity meter and gas meter, which is available for a Small Business Customer to enter into a supply contract?

2a – No – different Suppliers provide different features within their products. Price is therefore not the only differentiator, for example some suppliers offer only Fixed energy priced products, some supply only market tracking products and still others provide a blend of both as a choice. Given the volatility of energy markets we need Suppliers to become increasingly innovative in terms of the contract styles they offer and this will allow businesses to seek a contract style that fits with their energy procurement strategy.

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Question 3a. Should energy suppliers be required to publish information on their websites sign-posting non-domestic consumers to relevant support and advice services? Please provide reasoning to support your answer.

3b. If yes, how do you suggest that this measure should be implemented? (For example, licence requirement/ Code of Practice/ guidance document).

3a – Yes – a guidance document detailing the considerations needed to reach an energy procurement strategy could be prepared, and include checklist of features that need to be taken into account before signing. Eg is the offer fixed energy or floating market, if floating market then what is the reference index, is the standing charge as per published pass-through or has it

been increased by the supplier, is the contract for green energy, if green is it 100% green and how is this vouched (FMD, REGO, EU GOO...) etc.

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Question 4a. Should non-domestic consumer bills include a standard, mandatory statement stating that the consumer may not be on the cheapest tariff and information on how to switch? Please provide a clear rationale to support your answer.

4b. If yes, how do you suggest that this measure should be implemented? (For example, licence requirement/ Code of Practice/ guidance document).

4c. Are there any other publications that you would suggest this statement be included in? Please provide a clear rationale to support your answer.

4a – Such a statement would serve no meaningful benefit in terms of comment on tariff. Non-domestic customers are commercially aware.

4b- Would be useful is guidance on how switch a supplier and the Notice periods that are required to do so

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Question 5a. Should there be a requirement for suppliers to provide non-domestic consumers with clear information around when the security deposit will be paid back to them, and require the supplier to confirm if there are alternative measures or options available other than the deposit? Please provide a clear rationale to support your answer.

5b. If yes, how do you suggest that this measure should be implemented? (For example, licence requirement/ Code of Practice/ guidance document).

5a – Yes – there should be a clear statement as to how long all or part of the security deposit will be held by the supplier and a mandatory release after a period of consistent and compliant bill payments by the customer.

5b – a License requirement would be most robust.

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Question 6a. Should notice periods under deemed contracts be prohibited? Please provide reasoning to support your answer.

6b. If yes, how do you suggest that this measure should be implemented? (For example, licence requirement/ Code of Practice/ guidance document).

6a – Yes – deemed contracts can apply higher supplier margins on top of prevailing market reflective rates passed through to the customer. These rates over-represent the risk a Supplier is exposed to (bearing in mind the customer has been in-contract for a prior period of time) and appears to be an excess profit win opportunity for the Supplier. Being held in these circumstances for >1 month is unreasonable and commercially unfair, especially when end of contract/notice/switching arrangements are not especially well set out.

6b – a License requirement would be most robust.

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Question 7. Should the feasibility of an electricity prepayment meter solution for non-domestics be further explored? Please provide reasoning to support your answer.

This may be suitable for micro-businesses, but it is important that such an arrangement would not interfere with the commercial advantage of a switch of supplier being implemented at the end of a contract period.

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Question 8. Are there any other additional measures to enhance the operation of the non-domestic retail energy market which respondents think should be considered as part of this consultation process?

8b. If so, please describe the measure and how it could be implemented (for example CoP/ licence modification/ guidance document).

Suppliers presenting Floating/Variable energy market component costs to their contracts should not be allowed to present a forecast of cost based on historical energy costs. It is misleading and inaccurate. (unlike Fixed energy cost contracts).

Suppliers should set out their offers for supply with fields that are in the same format as their bills. This is to allow transparency and bill validation.

Suppliers should be required to provide all information to the customer that would allow their bill to be validated, should the customer choose.

a License requirement would be most robust.