

Consultation Response**iGT095:**

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

Responses invited by: 22 Feb 2017

Respondent Details

Name: Dan French

Organisation: npower

Support Implementation ☐

Qualified Support ☒

Neutral ☐

Do Not Support ☐

Please briefly summarise the key reason(s) for your support / opposition

We support the change as this will facilitate consumer engagement and improve the switching process. This will reduce actual and perceived barriers to switching resulting from erroneous transfers and failed switches.

However since our response to UNC mod 0593 we do now have concerns around the proposed solution and the systems capability to monitor the use of information for its intended use. We would expect to see controls in place to mitigate this.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

We believe this does not meet the self-governance criteria due to the potential impact this could have on market competition.

Please state any new or additional issues that you believe should be considered

Again since our response to UNC mod 0593 we do have concerns around the proposed solutions system capability to monitor the use of information for its intended use.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

This change will ensure a better journey for consumers, improving the switching process and will facilitate ongoing consumer engagement. In turn this will stimulate competition amongst market participants.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

None

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

We would like to see this being implemented as soon as possible.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

Yes

Further Comments

Is there anything further you wish to be taken into account?

None.

Responses should be submitted by email to iGTUNC@gemserv.com