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Via email
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This response was prepared by the Energy team within Citizens Advice. It has statutory responsibilities to represent the interests of energy consumers in Great Britain. Citizens Advice welcomes the opportunity to respond to Ofgem's statutory consultation on white label providers.

We agree that White Labels have the ability to deliver consumer benefits, choice and engagement with the market. However increased transparency about the relationship between white labels and their partner suppliers is also essential. We therefore support Option B.

Question 1: Do you think the implementation date of our proposals is appropriate? If not, please explain your reasoning, suggest an alternative implementation date and provide evidence to support it.

We agree with the proposed implementation date.

Question 2: Do you agree that the amendment to the white label definition captures the policy intent of our proposals? If not, please explain your reasoning.

We support the amendment to the definition. It makes clearer that the white label is a separate commercial entity (whether independent or part of a larger concern), entering into a partnership with a supplier as a way of increasing market choice. The restrictions on the partner supplier marketing the white label tariff but including it within CTM should increase transparency and prevent "opportunistic" white labels once the restrictions end. It remains important that the white label is transparent about its relationship with its partner supplier.

Question 3: Do you have any comments on our proposed supply licence condition changes in the supplementary appendices?

We have no specific comments and support the requirement that both the white label's and supplier's TCM include both their own and their partner's tariffs where appropriate.

For any further information contact:

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