

Will Fletcher
Project Manager
Energy market investigation
Competition and Markets Authority
Victoria House
Southampton Row
London
WC1B 4AD

5th August 2015

Dear Will,

Responses & Comments regarding the CMA's Energy Market Investigation, Provisional Findings & Possible Remedies published in July 2015

Utilities Savings Ltd is a small but professional business operating as a "Third Party Intermediary" (TPI) exclusively in the non-domestic consumer market. As founder and Managing Director of Utilities Savings I personally have considerable experience of working in the field of utilities sales and marketing, in both domestic and non-domestic consumer market sectors, since full deregulation began in 1998.

Utilities Savings is a full member of the Utilities Intermediaries Association (UIA). We joined the UIA in order to demonstrate our company policy and approach to our clients meets the required standards set by the UIA and we operate to the agreed UIA Code of Practice and our clients have access to the UIA's independent redress scheme.

Utilities Savings has previously contributed to Ofgem's consulting work in this area (Retail Market Review) with regards solely to the non-domestic (Micro-business) sector.

For ease of reference we have attempted to detail our responses/comments under each CMA heading or section and as it appears in the CMA reports & notice documents.

Regarding the Summary of Provisional Findings

Nature of Retail Market – Some General Comments & Observations:

Demand and supply characteristics and the parameters of retail competition

82. *"Gas and electricity are extreme examples of homogenous products in that the energy that customers consume is entirely unaffected by the choice of retailer. We would expect, therefore, that price would be the most important product characteristic to a customer in choosing a supplier and/or tariff. A further implication of homogeneity is that customers may be less interested in engaging*

- 1 -

Utilities Savings Ltd
Suite 4, Galley House, Moon Lane, Barnet EN5 5YL
Tel: 0845 33 75 997 Fax: 0845 33 75 998 Email: enquiries@utilitiesavings.co.uk

VAT REG NO. 884 891 264

COMPANY REG NO. 05855956



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in the market for electricity and gas supply than in other markets, where there is quality differentiation of products”.

Our view would be that this statement is a vast over-simplification regarding the nature of energy as used as a raw product and the overall value & cost equation when purchasing a supply contract. For example, there are different sources of energy that may well effect user buying decisions and some suppliers have been specialising in this area. Energy contracts can be 'green' renewable, nuclear and/or carbon-free and the demand for such specified sources can and could have an impact on the contract choices made. Other 'raw' factors are the agreed length of cost/supply and to what level this is guaranteed. Therefore we would suggest that perhaps lack of sufficient supply of certain energy sources and/or lack of differentiation in supplier communication, pricing & marketing may be contributing to less consumer awareness and possible engagement on the choices that are available. We note the recent withdrawal CCL exemption for renewable energy supplies is an example of how this choice can impact value and cost returned to the consumer even post-contract choice.

86. *"We would expect competitive pressures to be such that customer service meets certain minimum required standards, notably accurate billing. We would expect some degree of innovation, around tariff design, convenience and services such as advice on improving energy efficiency. We consider that the scope for such innovation could expand significantly with the full roll-out of smart meters and greater potential for demand response”*

In the above statement our interpretation is that you are effectively & correctly recognising that the raw energy used is NOT the only important product element in terms of choosing a contract...should the price of that raw energy be proven as competitive & very similar cost from any retailer (subject to the source). Our view would be that this lack of differentiation of the cost proportion & value of essential & other optional services elements and brand values of the overall 'product', supplier and energy contract available, apart from the raw energy, are due to lack of consumer product knowledge & therefore limit their perceived need for engagement. It seems to us that CMA have fallen into this same 'trap' of seeing raw energy as the key product rather than the brands, services and add-ons that are and could be available packaged around it.

Barriers to engagement

123. *"We consider that two fundamental characteristics of energy consumption are likely to impede customers' understanding of and engagement in energy retail markets. First, the fact that there is no quality differentiation of gas and electricity may fundamentally reduce consumers' enthusiasm for, and interest in, engaging in the domestic retail energy markets, leading to customer inertia. Second, conventional meters are not very visible or immediately informative to the customer, as a result of which, customers are generally not aware of how much gas and electricity they consume, when they consume it and which uses require the most energy. Further, conventional meters are generally read infrequently by the customer or the supplier, which adds considerably to the complexity and opacity of gas and electricity bills”.*

- 2 -

Utilities Savings Ltd
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We fully agree that lack of differentiation is a fundamental characteristic having the effect described above. However, we do not think conventional meters alone are necessarily a fundamental problem for many. Whilst we can see value in more advanced 'smart' meters our view is that the way this information is presented and accessed by consumers, and this being matched to their true individual requirements, is more the real issue and will become more, so as mobile and new media technology and consumer media habits evolve.

Micro businesses

169. *"The terms of reference for this market investigation cover the supply of energy to micro businesses, applying Ofgem's definition of a micro business (based on employees, turnover and energy consumption). Some micro businesses are much larger than domestic customers – the upper threshold of Ofgem's micro business volume definition for electricity is around 30 times typical domestic consumption – while others spend similar amounts to domestic customers".*

A general comment about this statement is that, in our view, it is worth noting the retailers (and then OFGEM) have classified and then segmented the 'micro business' and also wider business market to suit their mainly logistical/operational needs rather than those of many customers. It seems it is more cost-effective or simpler for suppliers to divide their resources this way (but it can be applied differently by suppliers also) and this means most suppliers do not meet or compete for all customer needs very well. For example, a larger corporate customer may find it impossible to obtain a non-micro business corporate contract for a 'micro business' premises from many retailers. This then affects contract terms, billing, price etc. which can lead to buyer frustration and then less engagement. It may also mean that suppliers are likely to over-simplify and restrict the extent & pricing of their product & service offerings to the larger micro businesses giving rise to less reason for engagement from that group of customers?

171. *"In relation to transparency, our provisional view is that there is a general lack of price transparency concerning the tariffs that are available to micro businesses, which results from many micro business tariffs not being published, and a substantial proportion of micro business tariffs being individually negotiated between customer and supplier. In particular, the limited availability and low usage of PCWs makes it more difficult for SMEs to get a view of prices across each market. Suppliers have recently made it easier for SME customers to get quotes, although we do not know if customers are widely aware of this development".*

We would agree that many suppliers may do not publish price tariffs or if they do they are selective in whom or which partners (PCWs/TPIs) they are provided to. Some suppliers will only quote bespoke prices for each separate customer enquiry although these may be based on internal price lists. We have noticed that suppliers generate pricing in different ways and there are probably individual operational/practical reasons for this 'lack of transparency' as well as some others

- 3 -

who may restrict pricing information in a deliberate attempt to exercise some control/restrictions over some marketing channels and PCWs/TPIs.

172. *“TPIs have the potential to help micro business customers engage with retail energy markets and reach good outcomes. However, we note that a number of complaints have been made to various official bodies concerning alleged TPI malpractice, which may have reduced the level of trust in all TPIs and discouraged engagement more generally. We also note that some TPIs may not have the right incentives to give non-domestic customers the best possible deal. We are concerned that customers are not aware of this and therefore do not take steps to mitigate it (for example, by consulting more than one TPI or seeking other benchmark prices)”.*

Many good TPI’s have helped many businesses engage with the market in an effective way. Bad TPIs also enable engagement which may prove not to be beneficial to the customer. Our view is that the micro business segment of the market would certainly have seen less switching without TPI activity. Since the market opened to competition, pressure has been placed on suppliers (by OFGEM, Govt., TV and press media etc) to generate sufficient switching in order to make or prove the market is competitive. This led to suppliers selecting poor quality direct marketing channels to enable these targets to be met whilst still protecting profit margins.

We believe that many of the complaints about poor TPI practice that have and still occur are largely down to the supplier selection of certain TPIs & umbrella aggregators who act more as agents of suppliers. It is important to recognise that a true TPI should be a fully independent broker who works primarily in the interest of the customer for a reasonable fee. However many ‘TPIs’ are still just ‘sales agents – often operating across a number of other markets as well as energy – and are largely concerned with maximising profits for themselves and the suppliers in the shortest route possible.

We firmly believe that good independent TPIs can have a much greater and more positive impact in generating competitive activity and good buyer behaviour if they are properly recognised and regulated and this is not left to suppliers’ choices or control. As bad TPIs, and possibly PCWs, are allowed to be selected by suppliers and continue to operate then this ultimately leads to less micro-business engagement following a bad TPI ‘experience’.

173. *“We have also found that a substantial number of micro businesses appear to be achieving poor outcomes in their energy supply. EBIT margins were generally higher in the SME markets than other markets (8% rather than 3% in domestic markets and 2% in I&C markets) and beyond what appears to be justified by risk. We observed that average revenues are substantially higher on the default tariff types that less engaged micro business customers end up on, compared with acquisition or retention tariffs, which require an active choice by customers. These differences in revenues between tariffs go beyond what is justified by costs”.*

- 4 -

Utilities Savings Ltd
Suite 4, Galley House, Moon Lane, Barnet EN5 5YL
Tel: 0845 33 75 997 Fax: 0845 33 75 998 Email: enquiries@utilitiesavings.co.uk

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Advising a micro-business is more complex & requires more supply and customer information than advising a domestic customer so, there is a 'cost to serve' difference to be expected in outcomes analysis. However, because the micro-business segment is dominated by agent type TPIs and 'umbrella brokers' - effectively controlled by the larger suppliers - the focus and tactics employed is often largely on maximising prices, length of contract and doing this as fast as possible (verbally) and thereby increasing commissions earned, and this impacts the outcomes achieved by this group of customers. Many suppliers also run agent-type incentive schemes which often only benefit the TPI and effectively encourage distortion the offerings and how/if they are presented to micro business customers so they are not always getting sight of the cheapest deals or all fairly compared.

174. *“We therefore have concerns that the less engaged customers on these tariffs are not exerting sufficient competitive constraints on energy suppliers. Our concerns are particularly about the various types of default tariffs that customers can be automatically moved on to if they have not actively engaged with their energy supply (auto-rollovers and replacement contracts), or if they are receiving energy supply in circumstances where they have not agreed a contract (deemed and out of contract tariffs)”.*

The introduction of SLC 7A has probably already improved many non-domestic customers' ('micro-businesses') understanding of their contract renewal options and supplier terms that need to met. Micro non-domestic consumers are now better informed about contract termination requirements and default tariffs. Many of our clients have learned this from past experience and this can often be the primary reason for seeking the assistance of TPIs. The possibility of the automatic rollover of contracts is now reduced but it is still possible for, what we would consider unfair prices, to be enforced by suppliers for 12 months. In our experience, most non-domestic customers who suffer from a contract rollover will primarily blame the supplier involved and switch to another supplier as soon as possible. Most express to us that they will never return to the supplier who performed the auto-renewal. It could be that customers become increasingly frustrated by the energy market engagement process as they perceive all suppliers to be more concerned about maximising shorter-term profits than delivery of sustainable market or consumer needs and benefits.

175. *“Overall, our provisional finding is that we have identified a combination of features of the markets for the retail supply of gas and electricity to SMEs in Great Britain that give rise to an AEC through an overarching feature of weak customer response from micro businesses, which, in turn, give suppliers a position of unilateral market power concerning their inactive micro business customer base which they are able to exploit through their pricing policies. These features act in combination to deter micro business customers from engaging in the SME retail gas and electricity markets, to impede their ability to do so effectively and successfully, and to discourage them from considering and/or selecting a new supplier that offers a lower price for effectively the same product”.*

- 5 -

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We would agree that there is a weak customer response from many micro businesses. However, we would suggest that a more in-depth understanding of all reasons as to why this is occurring (and if it is worsening?) and what differences occur in this response in the different sectors of the micro business market should be achieved prior to finalising all remedies.

Regarding the Summary of Possible Remedies

Remedies to provide the framework for effective competition between retail energy suppliers

Remedy 3 – Remove from domestic retail energy suppliers’ licences the ‘simpler choices’ component of the RMR rules

We agree that using greater complexity of metering and tariffs is a better way to progress innovation (and engagement) in the market than over-simplification via ‘simpler choices’ which would limit customer choices and options. We also think this is certainly the right approach for business customers. Our main concern about this is that all suppliers seem to struggle with new technology and changing processes and this usually causes considerable billing and service issues for customers which can then lead to lack of desire to engage in switching supplier.

Remedy 4a – Measures to address barriers to switching by domestic customers (and Micro businesses)

(a) Will the roll-out of smart meters address the feature of uncertified electricity meters? If not, what additional remedies should we consider to address this feature?

Not exactly sure what is meant by ‘uncertified meters’ in this context? If this is meters and supplies via independent networks (IDNOs) rather than National Grid then smart meters are unlikely to solve this issue alone. Suppliers must be forced and supported to engage with the whole market and not be selective to suit their existing systems.

(b) Will the roll-out of smart meters address the barriers to switching faced by customers with Dynamic Teleswitched (DTS) meters? If not, what additional remedies should we consider to address this feature?

Not unless all suppliers change product offerings and enhance services & tariffs available to DTS meters at a reasonable price.

(c) Should PCWs be given access to the ECOES database (meter point reference numbers) in order to allow them to facilitate the switching process for customers?

Wider access to ECOES would be helpful to identify supply details for customers who find it difficult to gather this information. This can often happen when moving

- 6 -

Utilities Savings Ltd
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in to a premises and arranging first contract s no bills or MPAN is available without referring to the MPAS for that areas and/or the incumbent suppliers which often takes a few days at least and may delay and then discourage customers to engage with suppliers. Asking suppliers for this information may give them unfair competitive advantage? However the way ECOES is accessed and used should be regulated.

(i) **To what extent would this reduce the rate of failed switches and/or erroneous transfers?**

ECOES is not 100% perfect and supply addresses and supply status may be at odds with information given by customers. Some TPIs may have indirect access to ECOES and their assumptions or errors based on this data may actually be causing erroneous transfers. Only this week we have come across an erroneous change of occupancy on one of our own clients premises which seems may have been the result of poor use of ECOES.

(ii) **Are there any data protection issues we should consider in this respect?**

Written authority/approval should be provided by the customer concerned and passed to the ECOES provider who must respond promptly.

(iii) **Will access to this database still be relevant once smart meters have been introduced?**

Yes – we don't see why smart meters would solve this problem unless functionality allows access to MPAN details but hopefully the ECOES data will become more precise.

(b) Do customers need more or better information or guidance on how their new smart meters will work?

Yes – customers need to know what smart meters are capable of and what they cost them too. They need to know if they may actually restrict supplier choice in future.

Remedy 6 – Ofgem to provide an independent price comparison service for domestic (and micro business) customers

(a) Would this remedy be effective in increasing customers' trust in PCWs and thereby encourage engagement in the markets and switching?

Unlikely to succeed possibly the opposite effect would result. Business tariffs are too complex and we do not think business users will necessarily use the OFGEM website without significant prompting. However, if they did it could effectively kill off many of the PCW and TPI businesses and smaller suppliers leaving

- 7 -

customers even more under the control of the big 6 suppliers and their agent-type TPIs. There is no guarantee that suppliers will compete and we expect all prices would end up very similar and higher and leaving little reason for customers to engage choose and switch.

(b) Should this service be online-only, or should it also operate over the telephone for those customers without access to the internet?

We do not think verbal discussion can provide effective comparisons so any telephone service would have to be backed up by written documentation which is costly and could take too long to still be fully valid by the time it is received by the customer.

(c) Is there a risk that such an independent service could undermine the development of other PCWs in the energy sector? How could this risk be mitigated?

OFGEM could provide recommended routes to source good PCWs and TPIs for this comparison remedy?

(d) Should the Ofgem website quote the energy suppliers' list prices only? Or should it seek to provide full details of all quotes available on the market (including on other PCWs), i.e. function as a meta-PCW?

Same as answer to (c) above.

(e) How could we ensure that an Ofgem price comparison service was robust in terms of offering all tariffs available on the market? Should there be an obligation on retail energy suppliers and/or PCWs to provide information to Ofgem on their tariffs?

This would be near impossible to provide all tariffs for businesses and maintain their validity each day. Suppliers may then be inclined to over-simplify and exploit this to increase profits at the expense of the customer.

(f) Should any price comparison service operated by Ofgem be transactional, i.e. be able to carry out switches for consumers, or should it provide information only?

Switching should not be possible via OFGEM for micro business customers. We do not think public bodies should be involved in providing marketing for suppliers and this is not the way a truly competitive market should operate. However, one could argue that vulnerable domestic customers may benefit from this sort of service in the shorter term?

(g) What would be the likely costs to Ofgem of offering this type of price comparison service? Would Ofgem need additional funding and/or statutory powers in order to provide this type of service? If so, where should this funding come from?

There would be very high costs to create and then maintain this sort of service. The process would end up adding these costs to all customers' energy bills or taxes regardless of whoever pays for it initially.

(h) How should customers be made aware of the existence of this service? Should information be provided by energy suppliers on bills/during telephone calls? Should PCWs be required to provide links to the Ofgem website during the search process to allow customers to cross-check prices?

Not relevant unless this remedy is taken forward? More of a marketing and communications issue really. Unlikely that PCWS and TPIs would still exist in any case.

(i) Is there any additional information that Ofgem should provide on its website relating to energy suppliers and/or tariffs to facilitate the customer search and switching process?

As an alternative to published tariff lists for all suppliers OFGEM website could provide broader current benchmark unit costs/prices for domestic and small business users across a range of common tariffs. Supplier service/complaint ratings information and links to proven good fully independent PCWs & TPI websites/contact details.

Remedy 7 – Measures to reduce actual and perceived barriers to accessing and assessing information in the SME retail energy markets

73. "In addition, we have provisionally found that the role of TPIs in the micro business segment of the SME retail energy markets is an additional aspect that contributes to a feature of actual and perceived barriers to accessing and assessing information in the SME retail energy markets. In particular, we observed that trust in TPIs is likely to have been reduced in the micro business segment due to alleged TPI malpractice, and that customers were not necessarily aware of the incentives (in the form of commissions that TPIs receive) not to give customers the best possible deal".

See our response to Provisional Findings 173 & 174 noted above. Please can you recognise that not all TPIs are the same or guilty of malpractice and we strongly believe that many good truly independent TPIs, such as ourselves, have

contributed to engagement? If this remedy ends all TPI activity – good and bad – then this would certainly be a case of ‘throwing the baby out with the bath water’.

Remedy 7a – Introduction of a new requirement in the licences of retail energy suppliers to provide price lists for micro businesses on their own websites and to make this information available to PCWs

(a) Would this remedy be effective in increasing price transparency for micro business gas and electricity tariffs? Would it serve to make comparisons between different suppliers easier, either directly or by encouraging the development of PCW services for micro businesses? If not, are there other measures that would encourage this development either as an alternative to this remedy or in conjunction with it?

No. see comments about this in relation to Remedy 6, Business prices are too complex for this and would only lead to further confuse and discourage customer engagement in our view. Bespoke micro business prices, where available are usually cheaper as they include no ‘buffer’ margin. Bespoke prices can change daily or even hourly (esp. gas).

(b) Do micro businesses have sufficient access to the information they need (for example on their meter types) in order to engage effectively in the search and switching process?

No. This is often the main reason why micro businesses seek out TPIs to assist on many occasions especially on change of tenancy.

(c) How long should energy suppliers be given to provide the required information?

Information about supply/metering is & should be available quicker via MPAS/MPRN line services or another independent service – certainly not via suppliers only. When moving into premises how does a customer know who their current supplier is to know which one to contact?

(d) Should energy suppliers be permitted to fulfil this requirement by providing an automated quoting service on their websites (where micro businesses can put in their details in order to obtain quotes) rather than a list of prices?

Many suppliers already do this. They are mostly not the best prices available so allowing this we believe would only lead to increasing energy prices. Customers do not want to and probably will not spend time visiting multiple websites.

- 10 -

Utilities Savings Ltd
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Remedy 7b – Introduction of rules governing the information that TPIs are required to provide to micro business customers

- (a) **Would this remedy be effective in improving transparency over incentives and trust in TPIs in the energy sector? How could the CMA ensure that this remedy was enforced, i.e. that TPIs were providing the specified information?**

We are strong supporters of transparency and clarity for our clients. Removing poor TPIs who mislead or do not provide written quotes and distort the process for customers is generally a good idea.

- (b) **What information should be provided by TPIs to micro businesses in order to enable them to make informed choices?**

At Utilities Savings every client receives a detailed written bespoke quotation showing unit rates plus current costs vs. future costs over time based on forecast usage. We quote as many suppliers as we are able to offer in the circumstances. Issues other than supply characteristics may influence how many suppliers we can offer such as location, meter-type credit score, current supplier, and the fact that some suppliers seem reluctant to deal with us and send us prices directly.

- (c) **Could the provision of certain types of information have unintended consequences (e.g. customers choosing tariffs based on commission rates rather than total price)? If so, are there any steps that could be taken to mitigate this effect?**

We are happy to advise our clients the commission level we include in the contract. For micro businesses we work to a sliding scale based on energy consumption/spend & length of contract. This averages 2% of customer spend ex VAT & CCL. Sometimes we may vary this up or down to take account of the amount of work involved such as a new connection project.

- (d) **Should the specified information be provided to customers in writing or orally (or both)? At what stage in the sales process should this information be provided?**

At Utilities Savings we do not operate verbal agreements. Everything we do is in writing to ensure the customer has the chance to review it and avoid potential complaints (We have zero complaints). We do not think verbal contracts cover this process properly or offer any real benefit to the customer and strongly disagree with their use unless there are special circumstances such as for those with impaired vision.

(e) Should this remedy be introduced in addition to Ofgem's proposed code of conduct? Or should only this remedy (or only Ofgem's code of conduct) be introduced?

A code of conduct is a starting point and we have operated to the UIA code since 2019. There may be even reason scope to tighten these requirements if verbal contracts remain in use for micro businesses.

(f) Are there any additional measures that should be implemented alongside this remedy to enhance its effectiveness?

The conclusion I have come from my experience is that UK energy suppliers – especially the Big 6 - have deep-rooted organisational issues which are not being effectively addressed. Each supplier may have a slightly different set of problems (and some good points) but the behaviour they all demonstrate – often subtle- is an inbuilt 'denial' of the existence of the competitive market. Suppliers and their staff often seem to be swimming against the tide and constantly trying to avoid proper tenders and perhaps proper brokers? Not many would say it is their aim but they often do it.

I suspect that this organisational 'denial' often comes from within the organisations and from established staff culture, rather than from the very top down – at least officially. I know of many staff at energy suppliers who have been employed by those companies for 20 or 30 years or more and it may be that is one reason if they collectively feel their jobs might be at risk if costs are cut to support open competition?

We would also like to see all suppliers recognising a consumer's right to use a TPI service and willing to accept termination notices served by TPIs directly with an appropriate LOA.

Finally we feel the time is now right for suppliers to clearly separate out the cost of raw energy vs. other elements of contracts so that customers truly understand what they are paying for (or not) and can then make informed decisions and engage in the market with more confidence and better understanding getting the product they really need at the correct price.

We would like to have contributed a bit more but you give us limited time and we are only a small business. However, should you have any further questions about this response please don't hesitate contact me directly.

Yours Sincerely

David Spencer

Director

david@utilitiesavings.co.uk

Mobile: 07801 428564

- 12 -

Utilities Savings Ltd
Suite 4, Galley House, Moon Lane, Barnet EN5 5YL
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