



NHHRetailPriceReview@ofwat.gsi.gov.uk

14th December 2015

Response to the 'Review of non-household retail price controls' consultation.

The UIA, the Utilities Intermediaries Association enhances the reputation of the Tpi sector of the energy industry by giving confidence to those who use the services of UIA members, and has done since 2006. The UIA is a Trade Association which produces and maintains a register of Consultants and Brokers who meet and continue to meet the Associations requirements and agree with and operate to the UIA Code of Practice. The UIA maintains the processes where a user of its Members services, who become dissatisfied, can seek independent redress.

The Articles of Association of the UIA reflect the benefits to consumers and are available from www.uia.org.uk

The UIA is closely monitoring the transition of the Water Companies in England to support the opening of the market for Non Household Customers (NHH) from April 2017.

The UIA therefore, using the knowledge gained since the energy market opened to competition, has taken the opportunity to respond below to this and will to other appropriate consultation documents published by Ofwat.

'Review of non-household retail price controls'

The consultation document covers very well the direction Ofwat wishes to take and the UIA does not have a position regarding the questions posed in the consultation.

We would ask however if further consideration should be given to the effect in the market as April 2107 approaches when Third Party Intermediaries start working on the customers behalf to provide brokerage and other services. Will there be through this revisiting of the retail price control sufficient headroom for the added services to be included when competition is growing in the market?

For instance, in the energy market a 'pence per kWh' uplift or margin, is often levied by the TPI in conjunction with the energy Supplier for providing brokerage and other services.

The supplier in relationship with the Tpi will add that to the price the customer pays.

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Any member of the UIA will be transparent and declare this amount when asked but the process is open to the potential for abuse by non UIA members who are not signed to a Code of Practice and Redress scheme.

Alternatively, if Ofwat have in mind that Tpi's charge for whatever services they provide direct to customers and not through the supplier then the price control does not need to take this additional cost into account. The UIA would be supportive of this but many Tpi's may not. The process of transparency with up front charges would make the market in NHH water open and transparent.

Yours faithfully

A handwritten signature in black ink, appearing to be 'R Sinden', with a long horizontal flourish extending to the right.

R Sinden

For and on behalf of Utilities Intermediaries Association