

DEPARTMENT FOR
**BUSINESS, ENTERPRISE
& REGULATORY REFORM**

**CONSUMERS, ESTATE AGENTS AND
REDRESS BILL: MEASURES TO
STRENGTHEN AND STREAMLINE
CONSUMER ADVOCACY**

**CONSUMER REDRESS
SCHEMES IN GAS, ELECTRICITY
AND POSTAL SERVICES**

A CONSULTATION DOCUMENT

July 2007

URN 07/1187

Why BERR is conducting this consultation

The Consumers, Estate Agents and Redress Bill, which is currently before Parliament, includes provisions for consumers to benefit from new, statutory, redress schemes to resolve problems with their gas, electricity, or postal services providers.

The Bill provides for the Secretary of State to make an order that requires some or all of the categories of regulated providers of these services to belong to a redress scheme that is approved by their relevant regulators. The order may also provide that the requirement applies only to kinds of consumer complaints specified for example by reference to:

- (a) the subject matter of a complaint or
- (b) the description of the persons making the complaint.

The purpose of this consultation is to seek views on proposals in these areas.

This consultation therefore sets out proposals for the regulated providers of gas electricity and postal services to belong to redress schemes in relation to certain kinds of complaints specified on the basis of the subject matter of the complaints, and the description of complainant, and invites comments.

Issued	05 July 2007
Respond by	27 September 2007
Enquiries to Address	Consumer Redress Consultation, Department for Business, Enterprise and Regulatory Reform, Response Centre, 1 Victoria Street, London SW1H 0ET
Email	redress.consultation@dti.gsi.gov.uk

CONSUMER REDRESS SCHEMES IN GAS, ELECTRICITY AND POSTAL SERVICES

CONSULTATION DOCUMENT

CONTENTS

- 1 Introduction
 - 2 Complaint handling standards
 - 3 Better complaint handling for consumers
 - 4 Summary of Government Proposals
 - 5 How to Respond
 - 6 Redress schemes under the Consumers, Estate Agents and Redress Bill
 - 7 Defining the regulated service providers who should be required to belong to an approved redress scheme
 - 8 Defining the provisions of the Order relating to kinds of consumer complaints
 - 9 Description of complainants to be specified in the Order
 - 10 Subject matter of complaints to be specified in the Order
 - 11 Next steps
-
- Annex A Summary of questions
- Annex B Consultation Code of Practice
- Annex C Consultation response form
- Annex D List of organisations consulted.

REDRESS SCHEMES

1 Introduction

1.1 The Consumers, Estate Agents and Redress Bill sets out a new framework for consumer advocacy, with the establishment of a new National Consumer Council, which in turn must establish the Scottish Consumer Council, Welsh Consumer Council and Northern Ireland Postal Services Committee to provide a major step forward for stronger, more coherent, and more effective consumer advocacy.

1.2 The Bill also provides for the establishment of new, statutory, redress schemes to resolve consumer complaints in - initially – the gas, electricity and postal services sectors. The Government has announced that the position of consumer representation and redress in the water sector in England and Wales will be the subject of a separate consultation in 2008.

1.3 Redress schemes in general provide consumers with resolution of their complaints against suppliers of goods and services, where the suppliers have failed to resolve the complaints to the consumer's satisfaction. They are independent of consumers and of suppliers. The redress schemes can reach an impartial judgment on complaints that are referred to them, and can reach a decision which is binding on the supplier.

1.4 Where a decision made by a redress scheme is in the consumer's favour, the decision may specify that the supplier should provide an apology or explanation; pay compensation; or take such other action in the interests of the consumer as may be specified.

1.5 Redress schemes are already well established in other sectors, including telecommunications and financial services, and around the world. The schemes may take different forms: the best known are probably those known as "ombudsman" schemes, but other forms of redress schemes are operational in the United Kingdom. Redress schemes are also known as "Alternative Dispute Resolution" or "ADR" schemes.

1.6 The Energy Supply Ombudsman was established in July 2006 to resolve outstanding billing disputes. The ESO was set up by the energy suppliers who were members of the Energy Retail Association, following a determination by the Office of Gas and Electricity Markets in 2005, in response to a supercomplaint by Energywatch on billing issues. In practice, the ESO potentially covers approximately 80% of consumer complaints, based on the type of complaints made to Energywatch.

1.7 This consultation will address the scope of the proposed new statutory redress schemes by reference to the regulated service providers who should be required to be members of the schemes; the description of complainants who should be covered by the schemes and the subject matter of the complaints which should be dealt with by the schemes.

2 Complaint handling standards

2.1 As part of the Government's goal to strengthen and streamline consumer representation, the Bill places two new requirements on regulated providers in the energy and postal sectors. Regulated providers will be required to become members of an approved redress scheme, and will be subject to prescribed complaint handling standards. The Bill places a new duty on Ofgem, the gas and electricity regulator, and Postcomm, the postal services regulator, to prescribe complaint handling standards for their licensees, the regulated service providers. These two new requirements should be viewed together, as both will be critical to the success of the new arrangements.

2.2 The specific standards will be prescribed and set by way of regulations, following consultation as required by the Bill, and subject to the consent of the Secretary of State. The development of the new complaint handling standards will be the subject of separate consultations by the regulators.

3 Better complaint handling for consumers

3.1 Taken together, the complaint handling standards and the redress schemes represent a change in the way in which consumer complaints in gas, electricity, postal services and – in future – water will be addressed under the new arrangements. Responsibility for handling complaints will rest with the regulated providers. It will be necessary for regulated providers to deal effectively with complaints from their customers, to at least the minimum standards set by regulators, within their own organisations and – if necessary - through the redress schemes.

3.2 This approach represents a departure for some sectors, where – for over twenty years – there have been public bodies charged with handling complaints which the regulated providers have not addressed to the satisfaction of their customers. The new arrangements give regulated providers an incentive to invest in resolving complaints through their internal procedures rather than having to take matters to redress schemes for resolution

3.3 The new National Consumer Council will have a role to assist vulnerable consumers, who are defined as those whom the new Council considers cannot be expected to pursue a complaint on their own behalf. The Bill provides powers for the new Council to give assistance to vulnerable consumers by providing advice or by making representations on their behalf.

4 Summary of Government proposals

4.1 It is proposed that the regulated providers in the gas, electricity and postal services sectors should be required to become members of a redress scheme.

4.2 It is further proposed that the description of complainants who should be covered by the redress schemes for gas, electricity, and postal services should be domestic and micro-enterprise consumers, where:

(a) domestic consumer means an individual who purchases, uses, or receives, in Great Britain, goods or services which are supplied in the course of a business by a regulated provider, or an individual in Northern Ireland who purchases, uses or receives postal services from a regulated provider; and

(b) micro-enterprise consumer is an enterprise with a headcount of less than 10, and whose annual turnover and/or annual balance sheet total does not exceed €2 million.

4.3 It is proposed that the complaints to be included within the scope of the redress schemes should be those which:

(a) have been considered by the service provider, and not resolved to the satisfaction of the consumer;

(b) relate to the regulated products and services of the service provider, as provided to the complainant, unless there is an established alternative route for resolution of the particular class of complaint;

(c) concern complaints about the way in which the service provider handled the initial complaint;

(d) concern complaints where there was no evidence to support the complaint, but which were not handled by the service provider in accordance with an established standard or code of practice.

5 How to Respond

The Department for Business, Enterprise and Regulatory Reform invites views on any aspect raised in this document and, in particular, where views have been specifically requested.

This consultation opened on 05 July 2007. The last date for responses is 27 September 2007.

When responding please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of an organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled. Written responses can be submitted by letter, fax or (preferably) e-mail to:

Consumer Redress Consultation,
Department for Business, Enterprise and Regulatory Reform
Response Centre
1 Victoria Street
London
SW1H 0ET

Fax: 00 44 (0) 20 7215 6100

E-mail: redress.consultation@dti.gsi.gov.uk

A copy of the consultation response form is enclosed at Annex B. The Department will also be able to arrange for hard copies, or other languages or copies in Braille to be provided if necessary. Further copies of the electronic consultation document and the response form can be obtained from the DBERR website - www.berr.gov.uk/consultations/Open/index.html

A list of those organisations and individuals consulted is at Annex C. We would welcome suggestions for others who you think may wish to be involved in this consultation process.

Confidentiality

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004). If you want other information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for

disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

Complaints

If you have any comments or complaints about the way this consultation has been conducted, these should be sent to:

Nick Cooper

Consultation Co-ordinator

Department for Business, Enterprise and Regulatory Reform

Bay 56.

1 Victoria Street

London

SW1H 0ET

E-mail Nick.Cooper@dti.gsi.gov.uk

Tel (0) 20 7215 0346

See Annex A for the Consultation Code of Practice

Additional copies

You may make copies of this document without seeking permission.

Queries

Queries on the issues raised in this consultation should be addressed to the BERR Response Centre at the contact details above.

If you foresee any unintended consequences or other implications of our proposals please let us know what you believe these may be.

6 Redress schemes under the Consumers, Estate Agents and Redress Bill

6.1 The Bill gives the Secretary of State the power to require “regulated providers” of specified services to be required to belong to a “qualifying redress scheme”. This is explained in the Bill as follows:

- (a) regulated providers are licensed electricity suppliers, electricity distributors, gas suppliers, gas transporters, postal service providers; and – in future – water undertakers, sewerage undertakers, or licensed water suppliers;
- (b) a redress scheme means a scheme under which consumer complaints may be made to, and investigated and determined by, an independent person;
- (c) an independent person is one who is independent of the regulated provider and the relevant regulator for the sector
- (d) a qualifying redress scheme is one which has been approved by the relevant regulator for the sector, or one which is administered by the Secretary of State.

6.2 Redress schemes provide consumers with the means to obtain resolution and redress for complaints in cases where the regulated provider has not been able to resolve the complaint to the consumer’s satisfaction. The Bill specifies a minimum range of forms of redress which must be available to a complainant, comprising provision of an apology or explanation; payment of compensation; or taking such other action in the interests of the complainant as the independent person may specify.

6.3 Redress schemes do not provide any additional, duplicated, sets of rules against which the performance of service providers are judged. The requirements on regulated providers are already set out in a number of ways, examples of which are given below:

- (a) primary and secondary legislation;
- (b) licence conditions;
- (c) multi-lateral agreements or codes of practice, which may be required under licence conditions;
- (d) contracts;
- (e) voluntary codes of practice established by business sectors or by individual regulated providers,

- (f) standards of performance set out in regulations;
- (g) internal procedures adopted by regulated providers to provide service to their customers.

6.4 But redress schemes should not be focused on infringements of broadly regulatory requirements alone. Whilst any such infringement may give rise to an adverse impact on a consumer, and hence a complaint, the main focus should be on the impact on consumers of the licensed service or products provided, and any detriment to consumers as a consequence of any acts or omissions by the regulated provider. A complaint by a consumer to a redress scheme might possibly relate to:

- (a) the quality of performance by the regulated provider of one of the relevant requirements set out in legislation, licence, code of practice, agreement, or similar instrument;
- (b) any aspect of the administration by the regulated provider of the services provided directly or indirectly to the consumer;
- (c) any aspect of the regulated provider's services or communications with the consumer;
- (d) any services provided to other consumers, the execution of which have a perceived adverse impact on the consumer bringing the complaint;

where, in each case, the consumer has been unable to obtain satisfactory resolution of the complaint from the regulated provider.

6.5 Although the redress schemes will not create new rules for the performance of functions by regulated providers, the process of resolution of complaints by the redress schemes will provide valuable feedback for the regulated providers. This feedback should inform their own internal policies and procedures, enabling regulated providers to avoid similar difficulties with other consumers and improve both their own commercial performance and, importantly, their general standard of performance to consumers.

7 Defining the regulated service providers who should be required to belong to an approved redress scheme.

7.1 In regulated sectors, complaints may arise as a result of a range of issues which – under legislation and licences – are the responsibility of a number of different regulated providers. Clause 42 of the Bill¹ defines the range of regulated providers of services in the gas, electricity and postal

¹ Consumers, Estate Agents and Redress Bill, as amended in Public Bill Committee, and printed 24 April 2007

services sectors who might be included within the scope of the requirement to be members of a redress scheme as:

- (a) persons holding a licence under section 7(A)1 of the Gas Act 1986 (gas suppliers)
- (b) persons holding a licence under section 7(2) of the Gas Act 1986 (gas transporters)
- (c) persons holding a licence under section 6(1)(d) of the Electricity Act 1989 (electricity suppliers)
- (d) persons holding a licence under section 6(1)(c) of the Electricity Act 1989 (electricity distributors)
- (e) persons holding a licence under Part 2 of the Postal Services Act 2000 (postal services providers).

7.2 As complaints can arise in respect of any of these regulated providers, we propose to include all of the regulated providers within the scope of the redress schemes.

7.3 Question:

- 1 Is there a case for omitting any class of regulated provider from the list of those proposed to be included in the requirement to be members of a redress scheme?

8 Defining the provisions of the Order relating to kinds of consumer complaint

8.1 There is, of course, a range of options for defining the kinds of consumer complaints, for example in terms of the description of complainant and the subject matter of complaints that should be covered by the statutory redress schemes. The spectrum ranges from all complaints from all consumers, to specific complaints from a small, defined, group of consumers.

8.2 In order to assist with this definition, it is worth considering some general principles.

(a) Business consumers

It is likely that many large and medium-sized business consumers will have sufficient commercial power to resolve problems directly with regulated providers and will not want to seek redress through statutory schemes. Their services may be provided under contracts, backed up by specialist staff with the skills to monitor and assess the performance of the service providers against these contracts. These business consumers are likely to be able to use their commercial position to resolve complaints, or to have the freedom and expertise to seek alternative service providers. For such consumers, it could be argued that redress schemes would not provide any significant benefit, and accordingly that they should not be included within the scope of the redress schemes.

(b) Domestic consumers

There is likely to be general agreement that domestic consumers should be included within the scope of any redress scheme. Domestic consumers may, individually, lack the commercial power and the specialist skills to negotiate on an equal footing with a regulated provider, and – in the postal services market, for example – may not have easy access to an alternative regulated provider for the time being.

(c) Complaints with existing resolution mechanisms

Where complaints of a particular type have an established mechanism in legislation for resolution or redress, we should not seek to add a further, parallel, scheme of redress. Examples include the guaranteed standards of performance in gas and electricity, which provide for automatic compensation of specified amounts where consumers have suffered a loss of supply for a period. These forms of compensation are set out in regulations. The redress schemes do not need to cover the same ground, but might become involved in cases where compensation has not been paid under the regulations, and a consumer considers that it should have been, or in cases which are not covered by the regulations. Another example is that of disputes over charges quoted by gas or electricity distribution companies for connection to a network. In legislation, there is an established role for Ofgem to determine the charge in the event of a dispute, and there would appear to be no need to resolve that complaint in a redress scheme.

(d) Complaints without an evidence base

Most complaints have an evidence root which can be used for consideration of the merits of the case: the evidence will be in bills or records, for example. In some cases, there will be no evidence base. Examples include consumers posting letters in letter boxes which are then lost in the post. There is no receipt for the collection of the letter by the postal system and no evidence of it having been posted. In these cases, the regulated provider could have a code of practice for dealing with the complaints, or the issue could be covered in complaint handling standards set by the regulators. Reference of a complaint to the redress scheme could then be made on an administrative basis: that the regulated provider failed to follow the code of practice or standard.

8.3 These general principles set out a broad framework within which the detailed scope issues can be addressed.

9 Description of complainants to be specified in the Order

9.1 Taking as the starting point the inclusion within the scope of all domestic consumers, but excluding large businesses, there is a need to

identify an appropriate threshold to separate those businesses which should be included from the “large” businesses.

9.2 There is an argument that micro-enterprises have the same lack of commercial power as domestic consumers. In gas and electricity markets, micro-enterprises may have similar levels of energy consumption as larger domestic consumers, for example. And small business consumers may face very similar problems and have similar complaints to those of domestic consumers.

9.3 Micro-enterprises are defined as those with a headcount of less than 10, and whose annual turnover and/or annual balance sheet total does not exceed €2 million. Small businesses are those which employ fewer than 50 persons, and whose annual turnover and/or annual balance sheet total does not exceed €10 million. Medium-sized businesses are those with a headcount of less than 250, and turnover of €50 million or less or a balance sheet total of €43 million or less.²

9.4 Other distinctions are possible, particularly in gas and electricity, where there are thresholds based on consumption or meter type. In gas, there is a commonly used threshold of 2,500 therms (73,200kWh) consumption per annum, which is used to distinguish domestic and small business from larger industrial and commercial consumers.

9.5 There is certainly potential to delineate the description of consumers to be included in the redress schemes on an individual basis, with different criteria for a scheme covering gas and electricity from one dealing with postal services. But we should also bear in mind the possible need for a redress scheme for the water industry in England and Wales after the Government consultation in 2008. The Telecommunications Ombudsman Service (OTELO) deals with domestic and small business consumers.

9.6 In order to avoid uncertainty for consumers over whether they are eligible for their complaints to be considered under the redress schemes for different sectors, it is prudent to adopt a definition of eligibility which can cover all sectors. The definition must also allow for consumers, particularly vulnerable consumers, to be represented by a third party when taking a complaint to a redress scheme.

9.7 The definition of consumers in the Bill is very wide: in relation to the core functions of the Council, for example, these may be exercised in respect of all consumers without limitation. In relation to redress schemes, the provisions enable particular descriptions of complainants (or consumers) to be identified as those in respect of whom a supplier will be required to join a redress scheme. It is proposed that the description of complainant who should be specified in the Order as those in respect of whom service providers would be required to belong to a redress scheme should be domestic and micro-enterprise consumers, where:

² Recommendation 2003/361/EC.

(a) domestic consumer means an individual who purchases, uses, or receives, in Great Britain, goods or services which are supplied in the course of a business by a regulated provider, or an individual in Northern Ireland who purchases, uses or receives postal services from a regulated provider; and

(b) micro-enterprise consumer is an enterprise with a headcount of less than 10, and whose annual turnover and/or annual balance sheet total does not exceed €2 million.

9.8 In the case of both domestic and micro-enterprise consumers, it is envisaged that complaints could be accepted from persons – including agents – acting on behalf of the consumer.

9.9 Questions:

2 Do you consider that the description of complainant to be covered by redress schemes should be domestic and micro-enterprise consumers?

3 Are there any reasons for considering the addition of any other description of complainants?

4 Is the proposed method of defining the threshold of micro-enterprise consumers included in the proposed scope the right one? Are there other, simpler, or established ways of defining the threshold which would still provide clarity and certainty for consumers across different sectors?

5 Is there any advantage in considering different thresholds for micro-enterprises for redress schemes in different sectors, or is that outweighed by the risk of uncertainty and added complexity for consumers?

10 Complaints to be specified in the Order

10.1 Consideration of the scope for the types of complaints to be specified in the Order should start from the basis that the complaints should be:

a complaint which is made against a regulated provider by or on behalf of a person in that person's capacity as a relevant consumer in relation to the regulated providers (from clause 42(2) of the Bill); where

the service provider has had an opportunity to investigate and resolve the complaint, but it has not been resolved to the satisfaction of the consumer.

10.2 As discussed in section 7 above, any complaints on issues which have specific existing resolution schemes ought to be referred to the appropriate other scheme save in the circumstances described below. Classes of complaints which of their nature have no evidence base could be covered by a code of practice or by complaints handling standards set by the relevant regulators. Accordingly, redress schemes could consider complaints from consumers in cases where, for example, compensation has not been paid under the other resolution scheme and the consumer considers it should have been paid, or where the regulated provider has not applied the code or standard, or has applied it inconsistently or perversely.

10.3 Complaints may arise in relation to the way in which a regulated provider has dealt with the initial complaint, and that may have led to practical difficulties for the consumer. That type of complaint should be included within the scope of the redress scheme.

10.4 It is proposed that the complaints to be specified in the Order should be those:

- (a) which have been considered by the service provider, and not resolved to the satisfaction of the consumer;
- (b) relate to the regulated products and services of the service provider, as provided to the complainant, unless there is an established alternative route for resolution of the particular class of complaint;
- (c) which relate to the way in which the regulated provider handled the initial complaint;
- (d) where there was no evidence to support the complaint, but which were not handled by the regulated provider in accordance with any established standard or code of practice.

10.5 Questions:

6 Do you have any comments on the types of complaints to be specified in the Order?

7 Do you consider that the schemes should address all of the issues which might arise from the provisions of relevant services and supplies by a regulated provider?

8 Are there other kinds of complaints which ought to be included?

9 Is there any reason to exclude specific kinds of complaints, other than those with an established process for resolution and what are these?

11 Next steps

11.1 During the consultation period, regulated providers in the gas, electricity, and postal services sectors will continue with their preparatory work to plan for the implementation of the new redress schemes, in consultation with regulators, consumer bodies, and Government.

11.2 Ofgem and Postcomm will be considering the criteria which they will use in deciding whether to approve redress schemes.

11.3 At the completion of this consultation exercise, Government will set out its response by 21 December 2007. That response will include, in draft, the key elements of the Order to be made by the Secretary of State defining the scope of the redress schemes. That will enable the regulated providers in the gas, electricity, and postal services markets to complete the preparations for their schemes. Once the regulators have completed the approval process for the redress schemes, the Secretary of State will make the Order, and the schemes will be formally commenced.

11.4 The planned commencement date for the new redress schemes is Summer 2008. Transitional arrangements for the handling of complaints and the change to the new arrangements are being planned by the implementation team at BERR, in conjunction with regulators, consumer bodies, and the service providers.

CONSUMER REDRESS SCHEMES IN GAS, ELECTRICITY AND POSTAL SERVICES

Summary of Questions

In this consultation the Government invites responses to the following questions:

- 1 Is there a case for omitting any class of regulated provider from the list of those proposed to be included in the requirement to be members of a redress scheme?
- 2 Do you consider that the description of complainant to be covered by redress schemes should be domestic and micro-enterprise consumers?
- 3 Are there any reasons for considering the addition of any other description of complainants?
- 4 Is the proposed method of defining the threshold of micro-enterprise consumers included in the proposed scope the right one? Are there other, simpler, or established ways of defining the threshold which would still provide clarity and certainty for consumers across different sectors?
- 5 Is there any advantage in considering different thresholds for micro-enterprises for redress schemes in different sectors, or is that outweighed by the risk of uncertainty and added complexity for consumers?
- 6 Do you have any comments on the types of complaints to be specified in the Order?
- 7 Do you consider that the schemes should address all of the issues which might arise from the provisions of relevant services and supplies by a regulated provider?
- 8 Are there other kinds of complaints which ought to be included?
- 9 Is there any reason to exclude specific kinds of complaints, other than those with an established process for resolution and what are these?

Consultation Code of Practice

- 1 Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
- 2 Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
- 3 Ensure that your consultation is clear, concise and widely accessible.
- 4 Give feedback regarding the responses received and how the consultation process influenced the policy.
- 5 Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
- 6 Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

The complete code is available on the Cabinet Office's web site, address <http://www.cabinetoffice.gov.uk/regulation/consultation/index.asp>

List of Organisations Consulted

Office of Fair Trading

HM Treasury

Department for Environment, Food and Rural Affairs

Department of Enterprise Trade and Investment

Postcomm

Ofcom

Ofgem

Ofwat

Financial Services Authority

Office of Rail Regulation

Civil Aviation Authority

National Consumer Council

Scottish Consumer Council

Welsh Consumer Council

General Consumer Council for Northern Ireland

Energywatch

Postwatch

Financial Services Consumer Panel

Ofcom Consumer Panel

Consumer Council for Water

Passenger Focus

Air Transport Users Council

Energy Retail Association

Energy Networks Association

Water UK

National Grid

British Gas

Powergen

Scottish Power

EDF Energy

Scottish and Southern Energy

NPower

Royal Mail

Mail Competition Forum

OTELO

Energy Supply Ombudsman

Financial Ombudsman Service

British and Irish Ombudsman Association

Communications and Internet Services Adjudication Scheme

Centre for the study of Regulated Industries

OXERA