Citizens Advice response to Ofgem's market review of Third-Party Intermediaries

citizens advice

Citizens Advice
July 2026

About us

We can all face problems that seem complicated or intimidating. At Citizens Advice we believe no one should have to face these problems without good quality, independent advice. We give people the knowledge and the confidence they need to find their way forward - whoever they are, and whatever their problem.

We provide support in approximately 2,500 locations across England and Wales with over 18,000 volunteers and 8,650 staff.

Through our advocacy work we aim to improve the policies and practices that affect people's lives. No one else sees so many people with so many different kinds of problems, and that gives us a unique insight into the challenges people are facing today.

As the statutory consumer watchdog for the energy and post industries we have an important role to play in shining a spotlight on the problems consumers encounter, providing solutions to these problems and ensuring their voices are heard when important decisions are made about the future of these essential markets.

Executive Summary

Citizens Advice welcomes the opportunity to respond to Ofgem's market review of Third-Party Intermediaries (TPIs). Regulation of TPIs is necessary, due to the ongoing detriment which is occurring in the TPI market. Many TPIs act with transparency and make things easier for consumers, but the lack of rules and regulations in this market mean that service is very inconsistent between different TPIs of the same type. Ofgem has a unique opportunity to design an authorisation regime for an increasingly important segment of the energy retail market which is both forward-looking and suitably flexible. TPIs play a key role in the energy retail market, and will only become more important as we transition to cleaner energy.

However, poor practice by some types of TPIs, such as energy brokers, which are still essentially unregulated, is causing consumers considerable harm. This can negatively impact growth, as well as the ability of consumers to engage with innovative technologies. We are keen to work with Ofgem to support the development of this workstream as it continues.

In order to design a successful authorisation regime which achieves good outcomes for consumers, Ofgem should prioritise the following areas:

- **Minimum requirements;** all TPIs should be able to demonstrate that they can meet minimum requirements to operate in the energy retail market. This could be modelled upon Ofgem's existing conditions for energy suppliers, as well as the FCA's Threshold Conditions which brokers must be able to meet. Examples include fit and proper persons requirements, financial resilience tests, customer service and operational capabilities. These should be proportionate to the level of impact a TPI can have, so that TPIs which may end up functioning similarly to suppliers in terms of day-to-day control over a consumer's energy supply are subject to closer oversight and higher threshold conditions.

- **Registration requirements;** In order to ensure the removal of bad actors from the market, Ofgem should introduce a registration process for TPIs which enables identification of repeat offenders, and enforcement action to be taken where appropriate. This could also take the form of a publicly available list of registered TPIs for consumers to access. Access to this will support consumer confidence when using TPIs, and enable good functioning of advice services.
- **Transparency and clarity;** Ofgem should introduce regulation requiring that TPIs act transparently when they are working with consumers. This transparency extends to commission disclosure, contract terms, identification and accurate representation of authorised activities.
- **Continuous monitoring;** monitoring of the TPI market by the regulator and an independent consumer advocate. This will enable the early identification of detriment to consumers, as well as the basis for ongoing monitoring of the appropriateness of rules which TPIs must follow.
- **Clear route to independent redress and advice;** Ofgem should develop a clear complaints process which TPIs are obliged to follow, to enable consumers to feel confident to raise a complaint against their TPI and know how to access an Alternative Dispute Resolution (ADR) scheme. Ofgem should consider how best TPI consumers can be signposted to independent advice, and how suppliers and TPIs may communicate this clearly.
- **Swift, proportionate enforcement;** when something goes wrong, Ofgem should act quickly and proportionately to put things right. When a TPI breaks the rules, Ofgem should work closely with them to rectify the situation.

We recognise that Ofgem is moving to a consumer outcomes based framework of regulation. We are supportive of this work, but would emphasise that TPI consumers are put at particular risk in the current market, due to the issues we highlight below. As such, some prescription-based regulation will be necessary in order to raise and set standards in the market. Prescription-based regulation can drive improvements in the market as well as tackling harms to consumers, such as enabling the use of shared data standards across the market, which will help different aspects of industry work better together. We look forward to continuing to engage with Ofgem as it develops its framework for authorising third-party intermediaries.

Q1. What barriers to entry are there for new TPIs to enter the sector?
a) How do they vary by TPI type?
b) What effect do you think these have on the sector and consumers?
Not answered.

Q2. What features of the TPI sector do you think help support effective competition and good outcomes in the sector?
Third-party intermediaries, particularly brokers and PCWs, play an important role in supporting competition and good outcomes in the sector, particularly for non-domestic consumers. Research produced for Citizens Advice suggests that due to the relative complexity of the non-domestic energy market, disengaged consumers may gravitate towards brokers who simplify the process of obtaining a contract.

89% of those who used a broker to purchase their current contract found the process easy, compared to 78% of those who did not use a broker.[1] TPIs reduce the difficulty with which consumers can switch suppliers. This incentivises energy suppliers to lower prices and improve their customer service.

Given Ofgem's current consultation on an outcomes-based approach, the regulator should look at how TPIs can support its main goals. For example, TPIs who operate effectively and with consumer protections in mind, can support outcomes 1, 5, and 6: Consumers who make use of TPIs are often able to obtain more competitive contracts, representing fair market value;

[1] Yonder (2026) for Citizens Advice, forthcoming publication

are able to obtain up to date and timely information; and can more easily switch providers.

As the UK transitions to cleaner and more secure energy, it is more important than ever that consumers feel confident to engage with their energy supplier. Consumers who do not trust their energy supplier or feel confident to engage with them are less inclined to pick up the practices that are required to reach the government and regulator's goals, such as engaging with flexible tariffs and services. TPIs have a particularly important role to play in ensuring consumers can access suitable energy deals and that they clearly understand the terms of their contract.

a) What areas of the TPI sector do you think could be improved?
There are several areas of the TPI sector which could be improved. In order to achieve the best protections and outcomes for consumers, **it is important that Ofgem take steps to address the following areas: transparency and clarity, unsuitable contracting practices, and a lack of oversight.** In addition, we feel that Ofgem needs to take steps to address the current gap which exists in protections for vulnerable consumers who make use of a TPI (explored in our answer to Q11).

Many brokers operate transparently. This includes pre-emptively offering **accurate** information to customers regarding the identity of the broker, how many suppliers a broker/PCW may be able to obtain quotes from, proactively providing contractual information in a written format **ahead of contractual agreement**, and not applying undue pressure to customers to make decisions quickly. These should be the minimum standards which all TPIs who register with Ofgem should be able to meet. We expect TPIs to be able to demonstrate good practice which goes further than these standards. TPIs who operate with transparency and who are trusted by their consumers will be better able to support consumers to make informed choices when engaging with new, smart offerings, such as flexible tariffs and products.

However, **we also know that there are brokers who operate with insufficient transparency.** This can involve a broker not offering consumers all the relevant contractual information needed to understand what they are agreeing to, not disclosing their commission rates, or the range of quotes they are able to obtain from suppliers. In some cases, this can be as extreme as a broker misrepresenting themselves as a consumer's landlord or energy supplier, and applying high-pressure tactics to encourage a consumer to agree to an unsuitable contract.

CASE STUDY: Alice's story

Alice runs a small farm. When her last energy contract expired, Alice tried to set up a new one with her supplier. Her supplier directed her to a third party, who said they could renew the contract for Alice. Alice was not made aware of the fact that she was speaking to a broker before she signed a contract. Alice's broker has increased her standing charges from 50p a day to 80p, and Alice has recently received a bill for over £1000 for one month's usage. Alice feels like she has been misled, and does not know how to challenge any of these agreements.

The consequences of agreeing to an unsuitable contract can be extremely detrimental to the economic viability of a small business. In order for consumers to trust that brokers are working in their best interests, Ofgem should introduce regulation regarding how important contractual information should be disclosed and communicated. This includes the length of contract, the standing charge and unit rates, and the commission received by a broker. This should be accompanied by signposting requirements, which ensure that a consumer knows how to access independent redress and advice.

The issue of opaque practices in the market is further exacerbated by the prevalence of verbal contracting. This is an area which requires significant improvement. **We have seen cases come through our consumer service which indicate that unscrupulous actors take advantage of the lack of prohibitions on verbal contracting in the non-domestic**

market, and the fact that there is no cooling off period to ensure businesses stay locked into contracts.

Between a broker and a business, cold calls often act as the initial point of contact. **Business owners who move into a new property are often overwhelmed with phone calls from different brokers, some of whom employ high-pressure sales tactics to get customers to agree to a contract over the phone, often without seeing the terms laid out in writing**. These terms may then differ when the consumer sees the contract, but as non-domestic energy contracts are not subject to a cooling-off period and verbal contracting is still an accepted practice, consumers can end up trapped on unsuitable contracts. Ofgem should introduce clear regulations accompanied by guidance on acceptable marketing techniques in the TPI market, including placing restrictions upon cold-calling.

CASE STUDY: Martyna's story

Martyna recently signed a new contract with an energy broker over the phone. Martyna queried the standing charges presented to her, as well as the kWh prices, which were very high. The broker reassured her that both the standing charge and kWh rate would decrease. Martyna signed the contract on the basis of the understanding that these contractual terms would decrease, though she was not provided with evidence as to what they would cost after. **Martyna phoned the broker the next day and asked to cancel the contract, but she was informed that non-domestic contracts are not subject to a cooling-off period. Martyna has since discovered that the kWh rates will not drop for over 12 months, and that the standing charges will not decrease at all.** The supplier Martyna has the contract with has directed her to speak to the broker about these issues, but the broker is not providing appropriate guidance. Martyna is very concerned about the future health of her business, as she cannot afford these rates.

Research produced for Citizens Advice by Yonder indicated that businesses wanted a ban on verbal contracting, and restrictions placed upon cold-calling.[2] Even where TPIs do not misrepresent themselves or the terms, verbal contracting is not an appropriate method for engaging consumers. We expect Ofgem to look closely at verbal contracting, and consider whether it remains an appropriate method of contracting in an increasingly complex market.

For non-domestic consumers particularly, energy contracts may last a significant number of years. TPIs have a responsibility to get the most suitable deal for consumers who use them to purchase energy. This should necessarily be accompanied by ensuring that the consumer has enough information and time to make an informed decision. As many consumers may make a verbal contract over the phone, they would benefit greatly from a cooling-off period, similar to domestic consumers, in order **Ofgem should introduce a cooling-off period of 14 days for small non-domestic consumers, to ensure they are achieving good outcomes. Where evidence of fraudulent behaviour is discovered, there should be an appropriate mechanism for concerned parties to raise this issue to Ofgem.**

Finally, we have concerns about the lack of oversight in the TPI market. Particularly for brokers, it is difficult to ascertain an exact figure in terms of how many are operational in the market. It also makes it difficult for a consumer to check whether or not TPIs are legitimate, as there is no centralised list. The lack of oversight of this market means that fraudulent behaviour such as phoenixing is allowed to continue unchallenged. **In order to ensure the removal of bad actors from the market, Ofgem should introduce a registration process for TPIs which enables identification of repeat offenders, and enforcement action to be taken where appropriate.** Enforcement should be proportionate and evidence-based, e.g. levying fines on TPIs who are non-compliant. Complete revocation of authorisation should be at the extreme end of

[2] Yonder (2026) for Citizens Advice, forthcoming research

enforcement action. We would encourage Ofgem to consider producing a centralised list of registered TPIs that is searchable for consumers, to enable consumers to verify the authenticity of a TPI, particularly brokers.

In order to ensure rules are being appropriately followed, Ofgem should also think about how to ensure consumers are aware of the changes to come. This is a large change which consumers will need to be made aware of, so Ofgem should consider carefully how to work with suppliers and TPIs to raise awareness of these changes.

Q3. On what basis do TPIs typically compete? (e.g. price, customer service, access to suppliers, trust).
a) Please explain how important each factor is relative to one another.
Not answered.

Q4. Why would a TPI exit the industry? Please share any recent examples you want to highlight and what happens to consumers/suppliers/data and payments when an exit does occur. We are interested in voluntary exits, exits due to insolvency and acquisitions.
Not answered.

Q5. How do customers currently assess the quality and trustworthiness of a TPI before engaging with them?

TPIs recommend suppliers based on price; therefore, it is likely that consumer perception is influenced by the deal they perceive they are receiving. This is in spite of TPIs not having to declare what proportion of the market they are comparing deals from. Citizens Advice research from 2020 suggests that for those who use PCWs there is some degree of trust in more established brands; therefore, this could indicate that some consumers are likely to go with TPIs that offer known brands.[3]

[3] Citizens Advice (2020) Stuck in the Middle

Non-domestic consumers

It is very difficult for non-domestic consumers to assess the quality and trustworthiness of TPIs **before** engaging with them, as there is a lack of clarity over how many are currently operating, there is no requirement upon TPIs to register themselves with a regulator, and there is limited accountability when issues arise. While some protections exist under consumer law, resolving disputes when things go wrong can be a long, arduous process (for example, via the courts), whereas other energy sector regulations provide sector-specific rules that are enforced by specialists.[4]

We also have evidence that energy brokers cold-call consumers, along with polling data that demonstrates that non-domestic consumers are cold-called, creating pressure on them to switch to new providers, meaning that the opportunity they have to make an assessment of quality and trustworthiness is limited.[5]

Evidence from research produced for CA by Yonder indicates that non-domestic energy consumers indicate there is a distinct lack of understanding regarding how brokers and brokerages actually operate across the market[6].

Comprehension of energy brokers, specifically their processes, accountability, and commercial transparency remains limited and superficial. In fact, around a fifth of non-domestic consumers have **no understanding** of how brokers earn an income (19%), who is responsible if something goes wrong with the contract or supply what their responsibilities are (20%), or how they compare market coverage (23%). This lack of understanding rises to a quarter (25%) of consumers when

[4] Citizens Advice (2020) Stuck in the Middle
[5] Internal Citizen Advice data; Yonder (2026) for Citizens Advice, forthcoming research
[6] Yonder (2026) for Citizens Advice, forthcoming research

looking strictly at what protections, regulations, or standards energy brokers operate under.[7] Meanwhile, around half of all non-domestic consumers have only 'some' understanding of these matters and concurrently half used an energy broker to purchase their current contract. This is of concern to us, as it will naturally limit the consumers' ability to assess the quality of the TPIs they come into contact with.

Non-domestic consumers who had consulted a broker agreed that they were presented with a good variety of supplier options to choose from (85%) and that their broker was transparent about the number of energy providers they were able to obtain quotes from (86%). But our research in 2019 identified issues related to transparency of brokers about market coverage, similar to domestic autoswitchers. In a survey, 2 out of 3 brokers compared 10 suppliers or less, out of a market with 86 suppliers[8]. Ofgem should consider introducing rules which oblige TPIs to disclose how many suppliers they are able to obtain quotes from, to ensure consumers understand their contractual offering within the wider context of the market.

Nearly 1 in 5 (17%) of non-domestic consumers who consulted a broker and used them to purchase their current contract were cold-called.[9] This can occur immediately after registering a business or procuring a business space.[10] Because this is a busy period, it creates significant pressure to make a quick decision, yet this is often how they choose their TPI, a decision with large repercussions for their business. In some cases, consumers are not aware they are talking to a TPI, believing they are talking to the energy company or the landlord itself. This is not how a functioning market works. The lack of a redress mechanism currently in place means that, without a formal register or rating for TPIs, consumers are left in the dark when assessing quality and trustworthiness.

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[7] Ibid.
[8] Cornwall Insight (2019) for Citizens Advice, The Role of Third Party Intermediaries (TPIs) in the GB SME and Microbusiness Energy Supply Sector
[9] Ibid.
[10] Internal Citizens Advice data

CASE STUDY: Edward's Story

Edward is starting a new business, but on moving the business into a property, he has 10 to 15 missed calls from who he thought was the landlord regarding a commercial contract. This wasn't the landlord but a broker. Having been given some options for different rates, he signs the contract, but less than 24 hours later, he is not happy with the figures. He does not realise it is a broker he has been speaking to and feels the broker has misrepresented who they are. Although Edward emails to say he does not want to proceed, he is bound by the terms and conditions of the contract. Edward can make a complaint to his broker, but this does not mean that the complaint will be dealt with effectively.

Without an appropriate authorisation regime mandating that all TPIs meet minimum operational standards, alongside straightforward provider accreditations and robust dispute resolution mechanisms, consumers will continue to find it difficult to truly assess the quality or trustworthiness of TPIs. Furthermore, only 3 in 10 non-domestic consumers are currently aware that the government has confirmed its intention to regulate third-party intermediaries (such as brokers and price-comparison websites).[11] It is essential, therefore, that targeted work is done to raise awareness of these upcoming changes, empowering consumers to better assess TPI quality and trustworthiness.

Domestic consumers

We reported in 2020 that consumers believe TPIs, specifically price comparison websites (PCWs), are already vetted and checked by an official body and that there are systems in place to protect consumers.[12] Due to the size of the domestic PCW user market, regulation is required to ensure the safety and security of consumers as they continue to navigate an increasingly complex market.

[11] Yonder (2026) for Citizens Advice, forthcoming research
[12] Citizens Advice (2020) Stuck in the Middle

46% of UK adults used PCWs to purchase their energy tariff.[13] Despite domestic consumers commonly using PCWs, recent research we conducted indicates that they still have concerns about the transparency and impartiality of TPIs. Most agreed that PCWs received commissions on sales (71%), that they did not have to show every supplier (67%), and could promote those from which they received more commission (64%). They also had lower confidence that PCWs would signpost or support them when things go wrong: consumers disagreed that PCWs are required to explain to a consumer what happens if their switch goes wrong (44%) or signpost to independent sources of advice such as Citizens Advice (41%).[14]

These consumer beliefs indicate concerns about the transparency and impartiality of energy price comparison websites, particularly regarding their ability to offer unbiased advice and support throughout the switching process. Domestic consumers have lower confidence in the reliability of these websites when it comes to providing comprehensive and independent guidance, suggesting that consumers may feel less assured when things go wrong. However, as many consumers still use this method to select their energy supply choices, more needs to be done to ensure they can be confident in these TPIs.

Most domestic consumers who use PCWs to purchase energy have positive views on the service they receive.[15] However, as indicated in the earlier paragraph, this does not mean that consumers are guaranteed to get the best price and service, as PCWs do not need to disclose what part of the market they are working from or their commission rates. Over half of non-domestic consumers who used TPIs, including PCWs, energy auto-switching services, third-party apps, and bill splitters want greater transparency on how platforms use people's data, how suppliers are recommended and switched to, and what market coverage was used.[16] Additionally, they want to know if any of these TPIs had special

[13] Opinium Research for Citizens Advice (2025), unpublished
[14] Ibid.
[15] Opinium research for Citizens Advice (2025), unpublished
[16] Ibid.

relationships or deals with the providers they recommend. Those who used PCWs and energy auto-switching services wanted to know how to complain and address issues when things go wrong prior to changing suppliers.

CASE STUDY: Arthur's Story
Arthur switched energy providers for his home using a price comparison website. He was made aware that he could cancel his switch within 14 days but has since been told to pay an exit fee of £75. As the contract was agreed at a distance (i.e. over the phone or online), the contract should have been cancelled with no charge. The PCW had promised to handle this process but failed to do so, resulting in Arthur being financially penalised. Arthur needs to go back to the PCW for a reimbursement of the exit fees.

CASE STUDY: Suzy's Story
A broker set up a new contract for Suzy, but she did not really understand what the broker was saying. The first bill received was nearly £1000 for the month, and this was not based on an estimate. Suzy went back to the broker, who stated that they cannot change the contract, and refused to offer any further advice or assistance.

a) Is there any information that would better help consumers identify good quality TPIs?
A register: All TPIs, including brokers, should be required to register themselves with the regulator. This will enable easier identification of attempted fraud, and reduce instances of phoenixing.

Code of conduct: An enforceable code of conduct which sets minimum standards all authorised parties must meet to carry out regulated activities, to ensure brokers and brokerages act fairly, with clear redress and consequences when they act inappropriately.

Data transparency: Clarity on how suppliers use consumers' data, what data TPIs use when comparing the market, and what commissions they receive (including whether they receive higher preferential rates).

Complaints transparency: Clear processes on how to lodge and resolve a complaint when things go wrong.

Q6. How effective is the current complaints handling process for consumers who use TPIs?

The current complaints handling process for consumers who use TPIs is not working effectively. Evidence from research produced for CA by Yonder indicates that 1 in 4 business consumers have **no understanding of the protections, regulations and standards that brokers must operate under**. 17% of consumers who had used a broker at some point reported having no understanding of this. Nearly 1 in 5 business consumers reported that they had no understanding of who was responsible if something went wrong with the contract or supply.[17] It is difficult for consumers to understand what their rights are in this market, as TPIs are not bound by rules which apply to suppliers, though consumers often assume they are.

Volumes of complaints to the Energy Ombudsman and other ADR providers tend to be low. This is not necessarily because the market is functioning well, but is likely to be due instead to the lack of awareness small non-domestic consumers have about their energy supply. Consumers may find it difficult to locate complaints information with their TPI, whether or not they are bound to any regulatory agreements or rules, and what rights they have as consumers. Consumers are not always made aware that it is possible to register a complaint against a broker, and where consumers do attempt to raise a complaint using the relevant channels, they are often confused by the variety of channels available.

CASE STUDY: Marcus' story

[17] Yonder (2026) for Citizens Advice, forthcoming research

Marcus owns his own business, and has recently attempted to negotiate a better deal using an energy broker. The broker Marcus used promised him a 5% discount, but now they will not reveal the name of the supplier, or show proof that Marcus is saving any money. He has attempted to complain to the Energy Ombudsman about the broker, likely because this is the only body Marcus is familiar with, but the broker is not registered with their ADR scheme. Marcus is frustrated by this, and worried he has been scammed.

Ofgem should carefully consider how to proceed with the design of any further Qualifying Dispute Settlement Schemes. There are currently 3 separate ADR providers in the market, and it can be difficult for consumers to know which one a broker is signed up to if they are not transparent about this. Ofgem should assess the extant ADR schemes to ensure their compliance with current rules, and to verify that consumers are achieving equitable outcomes between different schemes. Ofgem could consider consolidating these schemes into one scheme, for ease of administration and complaints handling. We consider this necessary for domestic consumers of TPIs, to align with existing practice in the sector of a single Ombudsman.

Data sharing capabilities with the Energy Ombudsman should also be considered, due to the potential for cases where fault is shared between the supplier and the broker to be pursued once brokers are subject to regulation. For the avoidance of unnecessary delay and the prolonging of detriment caused to consumers, Ofgem needs to ensure that all ADR schemes are willing and able to work closely with the Energy Ombudsman's existing complaints process.

a) Are any variances in the complaints handling process depending on the type of consumer (e.g. domestic, non-domestic including Small/Microbusinesses/Industrial and Commercial).

It is likely that it is more difficult for domestic consumers to locate information about where to complain about a TPI than it is for non-domestic. There are currently no official pathways for domestic consumers to access redress, so their complaints options are more limited - often constrained to the individual complaints process of their TPI. However, because the incidences of detriment are less common and less harmful due to existing protections for domestic consumers, the potential for harm to consumers is lower.

A complaints process should be developed alongside one for brokers, but we are of the opinion that small non-domestic consumers are presently exposed to the most detriment due to the lack of a coherent complaints process. We cannot comment with regards to anything larger than small businesses, as this is the limit of our statutory remit.

Q7. To what extent does the current sector encourage and reward high-quality, low cost advice?

As the statutory advocate for energy consumers, we represent the interests of domestic and small non-domestic consumers. However, due to the restrictions of our statutory remit and the lack of consumer protection in the TPI market, we are often unable to offer TPI energy consumers in need anything more specific than general advice on consumer law. We are currently exploring what a potential consumer advice and advocacy role could look like in this space to ensure that regulations are accompanied by access to high-quality, independent advice for consumers.

Information about the current sector can be difficult to find and understand. Research from Yonder produced for Citizens Advice indicates that consumers often rely on their brokers for advice and guidance in the energy market, consulting them about issues with their supplier.[18] This presents a challenge for consumers when they have an issue with their broker. Public bodies like Ofgem and Citizens Advice were often considered less relevant to a business consumer's situation, assuming they could not support businesses, or were mostly for large corporations

[18] Yonder (2026) for Citizens Advice, forthcoming research

who had the resources to engage properly. Businesses instead report that they have turned to peer-networks who may be able to give industry-specific advice or tips on how to find a good broker.[19] **Ofgem should introduce signposting requirements for TPIs, particularly energy brokers, to an independent source of advice, and highlight their redress options.** Access to independent advice will improve business understanding of their advice options. For domestic consumers and households, our high brand recognition and public trust are built on their experience with our advice services, and could be replicated for small and micro-businesses as well.[20] This can be done with proper and robust signposting. There is also value in doing further promotion of our advice services in partnership and through stakeholders like the Federation for Small Businesses (FSB) and via marketing campaigns.

Though it is positive that businesses are strengthening relationships with each other, there is a gap in the existing market for an official source of independent advice for consumers making use of a TPI. An independent consumer advocate for TPI energy consumers is something we have called for previously, and we would like to reiterate our support for it here. An independent advocate would be able to effectively use evidence to monitor the TPI market, identify misbehaviour, and quickly flag any necessary changes to protections for consumers.

Q8. Do TPIs face any barriers in assessing tariff, data, service or product suitability for their clients?
Not answered.

Q9. How do you foresee the TPI sector evolving in the future? (e.g. via Market-Wide Half Hourly Settlement, flexible tariffs, digitalisation, artificial intelligence)
a) What impact will these changes have on competition and market entry?

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[19] Yonder (2026) for Citizens Advice, forthcoming research
[20] Unpublished Citizens Advice data

In order for the UK to reach net zero, increasing the uptake of flexible tariffs and services amongst consumers is essential. Forthcoming changes include the shift to a Market-Wide Half Hourly Settlement, proposals to mandate smart meter installations for all standard business tariffs, and the continued development of smart technologies designed to make flexing energy use easier. The government's tariff interoperability work with RECCo, within the Smart and Secure Electricity System (SSES) programme, will also allow third party organisations to access tariff data for the purposes of optimising consumers' energy consumption. This may encourage the growth of the optimisation market and enable greater automation.

With continued smart meter uptake, increasing amounts of personal energy data will be made available to enable personalisation and better recommendations. TPIs who complete the Smart Energy Code User Entry Process are able to securely access data held by the Smart DCC Network, or partner with authorised third-parties in order to better tailor recommendations. We expect to see the amount of TPIs registered to access this data increasing, and the further development of more specialised TPI offerings, which take advantage of smart technologies to make savings for consumers.[21] This makes it all the more important that Ofgem set appropriate and proportionate regulations for TPIs to comply with.

As TPIs diversify and specialise, it may be that more smaller organisations enter the market. This may include sole traders, of which there are already many in the broker market. For this reason, it is important that any regulation accounts for the likelihood of future specialisation. The continued development of the energy market will increase competitiveness between TPIs, as they specialise in order to capture different segments of the market or develop bespoke offerings.

[21] Citizens Advice (2020) Stuck in the Middle

Some have expressed concern that forthcoming regulation has the potential to set the barrier to entry to this market too high, thereby reducing competitiveness as smaller enterprises find themselves unable to compete with larger operations. We see this as fairly low risk. Ofgem could consider following the FCA's solution to this problem, by which smaller brokers may register as 'Appointed Representatives' (ARs) with 'Principal' firms, who hold ultimate responsibility for ensuring their ARs comply with regulatory requirements. This reduces the risk that regulation or reporting requirements can be set at a level too high for smaller participants to effectively compete.

Finally, we expect to see a reduction in levels of fraud occurring in the TPI market, and increased positive outcomes for consumers. With regulation introduced which offers energy TPI consumers protection from misrepresentation, predatory contracting practices, and access to independent advice and redress, currently unscrupulous actors will not be able to demonstrate that they are fit and proper to deliver their services.

These expected changes, alongside the burgeoning development of AI-based services and tools reinforces the need to ensure that Ofgem's approach to regulation is forward-looking and sufficiently flexible and outcomes-focused to adapt to changes in technology and capabilities.

Q10. Are there any consumer groups that face barriers to accessing the retail energy sector without using a TPI, and what drives those barriers?

TPIs play a central role in how consumers navigate the retail energy market. TPIs can provide ease of access to the market. Many domestic consumers are reliant on PCWs to help them navigate the domestic retail market. Consumers who do not use TPIs could face significant difficulties accessing the full breadth of the retail energy market, due to the time and complexity of comparing individual suppliers' offerings. This is a bigger issue for consumers who are particularly time-poor, or have less knowledge of the energy market, who risk exclusion from competitive market rates and comprehensive tariff comparisons without making use of PCWs. This may drive consumers towards autoswitchers, in order to limit the need to engage with the market. Bill-splitters are most commonly used by students and consumers who live in HMOs, and these consumers are sometimes not offered a choice as to whether they would prefer to use one or not.

With regards to non-domestic consumers, we focus specifically on micro-businesses and small businesses because this is the extent of our statutory remit. Unlike large corporations, they lack dedicated procurement departments or regulatory compliance officers to navigate an inherently opaque market.

While the polling focused heavily on users who had consulted a broker it shows that non-domestic consumers who use these TPIs value the services because of the barriers they face accessing the energy sector if they do not use them. Of those non-domestic consumers, the vast majority believe that using a broker made accessing energy easier at the time of purchase. 90% reported that they easily understood the terms they were offered by a broker.[22] The non-domestic energy market can be very difficult for business consumers to navigate, as they are often both time and knowledge-poor. Brokers successfully remove complexity from the contract details, providing a time-saving service for consumers. Consumers who do not have this support could face barriers in doing this independently, in particular at a busy time, or a time of high market volatility.

Those who do not use a broker can face informational barriers. Evidence from research produced for CA by Yonder indicates that those who used brokers to purchase their current energy contract, found it easier to compare the rates and tariffs offered by their current energy supplier against competitors, compared to those who did not (84% compared to 66%). They also found it easier to understand the contract information provided by suppliers (80% compared 71%).[23]

However, while TPIs help mitigate these market barriers, as outlined in Q5, ongoing issues regarding TPI quality and trustworthiness have the potential to limit and undermine their effectiveness and reputation. Compounding this challenge, non-domestic consumers still possess a highly limited understanding

[22] Yonder (2026) for Citizens Advice, forthcoming research
[23] Yonder (2026) for Citizens Advice, forthcoming research

of how brokers operate, meaning that the very tool required to bypass retail energy barriers can present its own set of navigational hurdles.

CASE STUDY: Elizabeth's Story

Elizabeth works for a hospitality business and is responsible for managing its energy supply. She was contacted by a broker who stated that the business's contract was up for renewal and that they could offer a better deal. Elizabeth went ahead and signed the contract. However, the switch was blocked because the existing contract was not actually up for renewal; the business was still locked into a three-year fixed-term contract. The broker is now pursuing Elizabeth for thousands of pounds in lost earnings because the contract was not fulfilled, and they are threatening court action. What initially appeared to Elizabeth to be a helpful service that would save administration time has caused severe issues later on.

CASE STUDY: Dillon's Story

Dillon runs a micro-business. He had an energy contract that was due to run until October, and he signed a new contract with a TPI in October. However, he discovered that the previous TPI he had used had entered him into a contract without his consent via an auto-renewal clause. When he questioned the broker about this, they stated that Dillon had previously agreed to an auto-renewal. The broker then sent through the terms and conditions to show what had been agreed to. What appeared to be a smooth service in fact meant that down the line Dillion has run into problems

Q11. How do TPIs currently identify and support consumers in vulnerable situations?
a) When TPIs do identify vulnerable customers, does the supplier get provided with that information?

Citizens Advice has raised the issue of vulnerable consumers being unprotected in their use of TPIs for several years. There is currently no obligation for TPIs to identify vulnerability, or to highlight it to the supplier where it is identified. It is a clear gap in protection. We have very little oversight of the current processes followed by TPIs.

Previous research by Citizens Advice into this issue indicates that TPIs are aware that vulnerable consumers are being put at risk by the current lack of regulation and protection. However, differences occur between companies in terms of the information they provide, how they identify and support vulnerable consumers, and who they consider to be vulnerable. Some TPIs have a very high degree of involvement with a consumer's day to day energy supply. For example, bill-splitters and autoswitchers can sometimes take on the primary relationship with the supplier for the consumer. This poses risks where TPIs may do this, but do not pass on information regarding vulnerability.

Consumer protections in energy rely on suppliers knowing who their customers are, understanding their characteristics, and identifying any additional needs. TPIs should be obliged to pass on any information relevant to vulnerability to suppliers.

Q12. What factors should be considered when designing an authorisation process? In your response, please consider the authorisation fee, information requirements, and any potential unintended consequences.
a) How might different approaches affect TPIs and the sector? Where appropriate, please provide examples from other sectors.

We expect all of the following to be considered during the development of an authorisation regime, in order to provide a strong, enforceable framework which both protects and empowers consumers, allowing a range of new models to enter the market.

Minimum standards

TPIs should have to prove that they can meet a set of minimum standards before they can be authorised to operate in the market. This will ensure that the TPI is capable of carrying out the activity they intend to be authorised for, and prevent them from carrying out activity that they are not authorised for.

These minimum standards may be tailored and specific to the activities being authorised. Some smaller companies, with lower levels of involvement in day-to-day activities, may only be required to demonstrate compliance with broad principles regarding transparency and fairness. Other companies who have more involvement with a consumer's day-to-day energy activities should be required to meet more specific requirements, similar to the FCA's Threshold Conditions. Examples of threshold conditions for this market should include fit and proper persons requirements, appropriate resource and financial requirements, supervisory requirements, and the ability to demonstrate a legitimately viable business model. This will prevent bad actors operating in the sector.

Clearly defined authorised activities

Ofgem should strive to clearly define which activities will be subject to authorisation. These should be based upon the activities of brokers, billsplitters, autoswitchers, and PCWs. Ofgem should develop clear definitions in consultation with the sector, particularly by engaging TPIs themselves to ensure the full spectrum of authorised activities is captured. It should then be made clear which activities a TPI is authorised to carry out, and which they are not. This could accompany requirements for TPIs to clearly signpost which services they can and cannot provide.

Continuous monitoring

It is important that authorisation is subject to continuous monitoring. Similar to reporting requirements levied upon energy suppliers, TPIs should be required to produce regular reports for Ofgem and an independent Consumer Advocate. The reports should contain information regarding customer numbers, smart meter status, and commission levels. These reports should be proportional to the level of involvement a TPI has in a consumer's day-to-day life. For example, TPIs with a higher level of involvement or risk, such as billsplitters or autoswitchers, should be required to report more regularly than TPIs with a lower level of involvement or risk. Reports could be less regular (e.g. quarterly or half-yearly), or require less granular detail.

This will function most effectively in conjunction with enforcement activities, which should be employed proportionately. Ofgem should have the ability to revoke authorisation swiftly, where sufficient evidence is produced to demonstrate that a TPI is, knowingly or not, causing detriment to consumers.

Vulnerable Consumers

An authorisation regime should include a requirement to identify and support customers in vulnerable situations. However, this should be applied proportionately to the extent of the TPI's management of the consumer relationship. In some cases, TPIs can essentially recreate the supplier relationship with a consumer, such as billsplitters. We have previously raised concerns about the risks posed by such relationships.[24] Energy brokers, who may not have a similar level of day-to-day oversight, can pose risks to non-domestic consumers as they are responsible for the negotiation of a contract. As active participants in the market, we feel that TPIs have an obligation to make suppliers aware of situations where a customer is vulnerable.

Yonder research showed that consumers were strongly supportive of the following interventions:

- More stringent requirements around identifying and supporting vulnerable consumers, where a TPI has greater involvement in a consumers' day-to-day life;
- Requirements for TPIs to work collaboratively with suppliers, Citizens Advice and the Extra Help Unit where appropriate, and enabling data sharing around vulnerable consumers;
- Access to dispute resolution schemes, such as the Energy Ombudsman, to help resolve more complex complaints;

[24] Citizens Advice (2024) Regulating Third Party Intermediaries (TPIs) in the retail energy market; Citizens Advice (2020) Stuck in the Middle

- Requirements on TPIs to ensure that all products and services are accessible to those who would benefit from them.[25]

TPIs who have a high level of involvement in consumers' everyday lives should have to pass more stringent fitness checks than those who have no involvement, to ensure that they are fit and proper to deliver accessible services to all consumers who require them.

Regulatory compliance

Ofgem should consider how existing regulations and requirements will fit into the authorisation process. Many TPIs are already registered with various industry codes and bodies, such as the DCC, SEC, and various ADR schemes. **For the avoidance of duplication and overly-onerous regulatory pressure, any regulatory framework introduced should account for existing compliance and registration requirements.**

Ofgem should also consider how a regulatory framework will accompany other, similar streams of work - for example, forthcoming regulation of load controllers, or protections for low carbon energy consumers. TPIs will have a growing role to play in helping consumers access these low carbon technologies, and it is thus important that the parallel frameworks are aligned as much as possible. For instance, both TPI and low carbon tech consumers could have access to a redress scheme underpinned by the same Ombudsman. This will reduce consumer confusion and make it much easier to achieve resolution in complex cases, where multiple service providers are involved.

Access to dispute resolution and transparency in complaints processes

As discussed in our answer to question 6, consumers should have access to independent redress. Ofgem should consider how to approach the issue of multiple ADR schemes in line with the principles outlined above. TPIs should be required to register with an ADR scheme, and provide clear information regarding how to initiate a complaint against a TPI if they are

[25] Yonder (2026) for Citizens Advice, forthcoming research

unsatisfied with the service they have received, as well as signposting to independent advice.

Authorisation fee

We would be supportive of an authorisation fee accompanying the registration process. It should be set at an appropriate level, possibly determined by the scale of the organisation attempting to register.

If authorisation is introduced which does not uphold these standards, it will result in the continuation of problems we currently see in the market, and the possible worsening of them. Citizens Advice considers the FCA's approach to regulating insurance brokers to be the primary example which Ofgem should draw upon when designing regulation, demonstrating the success of both proportionate and protective regulation in a similarly varied market. Though some concerns are raised about the restriction of competition under a model such as this one, we have previously pointed out that the risks of new entrants immediately being authorised to carry out designated activities without the ability to meet minimum standards outweigh the potential risk of reduced competitiveness.[26]

Q13. Do you agree with our description of how the TPI market typically operates and the customer journey? Please provide any additional information or evidence that would aid our understanding, and highlight where risks of poor outcomes are greatest, including any differences based on types of consumers.

Yes, we agree that that represents an ideal customer journey for a consumer making use of a TPI. By and large, brokers make the customer journey easier for consumers. Research produced for Citizens Advice by Yonder indicates that 89% of business consumers who made use of a broker were satisfied with the sales process, compared to 78% of those who did not make use of a broker.[27] Broker use increases satisfaction,

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[26] Citizens Advice (2024) Regulating Third Party Intermediaries (TPIs) in the retail energy market

[27] Yonder (2026) for Citizens Advice, forthcoming research

understanding, and ease of comparison. However, as we have previously highlighted, consumers' experiences can vary widely.

We consider the risks of poor outcomes to be the greatest at the point of contract negotiation. For consumers who make use of a TPI to obtain a contract for their business, they are often poorly informed about their rights as a consumer. They may assume they have the same rights for their business as they do as a domestic consumer. This is also the juncture at which verbal contracts may be negotiated. We have seen evidence that verbal contracts can be falsified, with particularly unscrupulous actors doctoring phone calls in order to produce agreements, changing the terms of the contract when set down in writing, or putting undue pressure on consumers to make decisions very quickly. Brokers also employ tactics such as limited-time only offerings to create a false time pressure or taking advantage of a consumer's inability to speak English.

At each stage of the customer journey, we consider the TPI to have a responsibility to ensure consumers are getting the most suitable deal. Any authorisation regime designed should reflect this.

Q14. To what extent do TPIs specialise by factors including consumer type, sector, or size of client?
a) What factors motivate this specialism?
Not answered.

Q15. What value do TPIs bring to the energy sector and what services do consumers value from them?
TPI's bring lots of added value to consumers. They can efficiently translate complex information resulting in an ease of choice for both domestic and non-domestic consumers. Additionally, the transition to net zero will lead to an accelerated rollout of flexible and smart technologies, products and services, increasing market complexity and confusion for consumers. In this context, TPIs will likely play a vital role in helping consumers navigate the evolving market and access the best energy deals.

Non-domestic consumers

TPIs play a central role in non-domestic consumers purchasing energy. Research produced for CA by Yonder found that 55% of non-domestic consumers consulted a broker to find their current energy tariff for their business.[28] The top method of purchase clearly demonstrates options that promote ease of access to the energy retail market: these were over the phone (33%) either as they reached out to the broker (16%) or they were cold called (17%). This was followed by purchasing their energy tariff online - through a price comparison website (25%), and online - through a broker website (24%).[29]

Non-domestic consumers find clear value in broker services, which fall under the following themes:

- Making understanding and accessing the energy retail market easier;
- Being professional, trustworthy, and acting in their best interests; and
- Ensuring access to competitive energy retail contracts.

Out of the non-domestic consumers who went on to purchase a contract through a broker, 90% felt they clearly understood the contract terms offered to them. Broker transparency indicates professional trust was valued, with 86% of businesses believing their broker acted in their best interests, 86% reporting fair and non-aggressive sales tactics, 86% agreeing that their broker's fees were easy to understand, and 86% confirming transparency regarding supplier market coverage.[30] Brokers made non-domestic consumers feel that they provided a service that made accessing the energy market easier and handled work that the consumers did not have to do themselves. Furthermore, 85% reported

[28] Yonder (2026) for Citizens Advice, forthcoming research
[29] Ibid.
[30] Ibid.

that they were presented with a variety of tariff choices, and 85% indicated they successfully secured competitive market rates available.

However, there are gaps that require regulatory context, as indicated in our response to Q5. High levels of consumer satisfaction do not account for a lack of understanding about how brokers operate and the regulatory framework (or lack thereof), nor do they provide objective ways to assess the trustworthiness of TPIs before engaging with them or to determine if consumers are objectively getting the best services. A small but important proportion of non-domestic consumers who used a broker reported negative experiences, including 5% who felt subjected to unfair or overly aggressive sales tactics, 5% who were dissatisfied with the lack of supplier variety presented, and 4% who did not trust that the broker was operating in their best financial interest.

Overall satisfaction with the **sales process** (everything from initial contact with the supplier, receiving quotes, understanding the contract terms, and the ease of completing the sign-up) when non-domestic consumers signed up with their current energy supplier for their businesses was higher among consumers who had any interaction with a broker (88%) compared to those who went completely without one (78%), but differences in dissatisfaction were more pronounced, when considering if broker usage resulted in sales.[31] Dissatisfaction between those who used a broker to purchase the current contract was lower (4%), compared to those who consulted but did not purchase their current contract (7%) compared to those who did not use a broker at all (3%). Suggesting that not using a broker doesn't result in a negative experience, but levels of dissatisfaction will be based on what goes on until the sale is completed.[32]

When it comes to non-domestic consumers' satisfaction and dissatisfaction with the energy supplier for their businesses about e**lements of the services,** satisfaction is higher and dissatisfaction is

[31] Ibid.
[32] Ibid.

lower amongst those who consulted a broker through to completion and sale. Those who did not consult a broker, had higher dissatisfaction with the value for money (15%), compared to those who consulted and bought (8%) and those who consulted but did not buy (11%).[33]

Those who consulted a broker but did not buy their dissatisfaction with flexibility of pricing or contracts is 14%, compared to 10% of those who never used a broker at all.[34] It appears that starting the broker process and failing to finish it leaves consumers worse off and more frustrated than if they had never engaged a broker at all. This suggests experiences with the energy provider can be influenced by TPI use.

Domestic consumers

TPIs such as price comparison websites (PCWs), auto-switchers, and bill-splitters are providing valuable services to many domestic energy consumers. PCWs can help consumers compare different suppliers or tariffs, making the energy market easier to navigate. Auto-switchers can streamline and automate the switching process for many, especially for particularly disengaged or vulnerable consumer groups who are otherwise unlikely to switch. Bill-splitters are particularly popular among students or other HMO residents and can help consumers manage billing and cost-sharing more easily.

<u>Price comparison websites:</u>

PCWs are the most commonly used TPI service by domestic consumers as over half (52%) of UK adults have used a PCW to choose an energy supplier at some point.[35] Consumers perceive the main benefits of using a PCW as money savings, simplicity, and familiarity.[36]

Our recent research demonstrates that among those who have used energy PCWs, many are satisfied with the service provided. A clear

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[33] Ibid.
[34] Ibid.
[35] Opinium (2025) for Citizens Advice, unpublished
[36] Citizens Advice (2020) Stuck in the Middle

majority felt that the PCW presented them with a good variety of supplier options (83%), that the PCW sales tactics were fair (78%), and that they understood the terms offered (81%). In total, 82% said that they would use the same PCW again for future energy needs, suggesting that consumers find these platforms useful and effective.[37]

However, the research also highlights some areas of concern. When asking consumers what they believed to be true regarding PCWs, a relatively high proportion were not aware that PCWs do not have to show every supplier in the market (33%), that PCWs receive commission on sales (29%), or that PCWs can promote suppliers it receives more commission from (35%).[38] This suggests that consumers believe that TPIs are more regulated than they are and that consumers' high trust engaging in this market is sometimes underpinned by misunderstandings. To strengthen PWCs value provision for domestic consumers, it is therefore important that the forthcoming regulation prioritises transparency and impartiality.

Auto-switchers / bill-splitters:

Auto-switchers and bill-splitter services are far less commonly used by consumers, with 11% and 6% of UK bill payers, respectively, saying that they have used these at some point[39]. Consumers perceive the main benefits of auto-switchers as the ability to save time and its value for those who are less engaged or more vulnerable.[40]

Among those who have used an auto-switcher service, many report positive experiences. A majority states that they believe the auto-switcher acted in their best interest when recommending suppliers (84%), that the auto-switcher offered them the most competitive rate available (79%), and that the auto-switcher was transparent about the number of suppliers it obtained quotes from (82%). In total, 82% said that they would use the

[37] Opinium (2025) for Citizens Advice, unpublished
[38] Ibid.
[39] Ibid.
[40] Citizens Advice (2020) Stuck in the Middle

same energy auto-switcher again for future energy needs, suggesting that former customers are satisfied with the service offered.[41]

Similarly, among those who have used another third party (such as bill splitters) many are satisfied with the service provided. A majority said that the third party had presented them with a good variety of suppliers to choose from (78%), that they trust that the third party acted in their best interest when recommending suppliers (78%), and that they believe that the third party offered them the most competitive rates available (75%). In total, 77% said that they would use the same third party again for future energy needs, suggesting that consumers found these services valuable.[42]

Q16. How are commission and other remuneration or benefit arrangements made in the TPI sector? We are interested in understanding how TPIs are remunerated or otherwise receive a commercial benefit, who and what determines the level of remuneration/benefit, what incentives do different existing remuneration/benefit structures create, and any concerns you may have on typical remuneration/benefit structures.
Not answered.

Q17. To what extent do TPIs face conflicts of interest (e.g. from commission structures or supplier relationships)?
a) How do these affect the advice or services provided to consumers?
Due to the relative difficulty of obtaining reliable information on TPI operations in the current market, it is hard to know with certainty how different actors structure their commission terms. However, research from Yonder produced for Citizens Advice indicates that 7% of business consumers who used a broker to purchase their current contract, and 14% of those who had previously used a broker had no understanding of how brokers earned their commission. We consider that any consumer who

[41] Opinium (2025) for Citizens Advice, unpublished
[42] Ibid.

uses a broker should be made clearly aware of how they earn their commission. This creates less room for fraudulent actors to operate.

It is a concern that there is a potential conflict of interest introduced by the variety of commission structures at work in the market. Brokers may be more motivated to recommend deals with suppliers who offer more favourable commission terms.

There are greater risks for “set and forget” TPIs. These arrangements can be less clear about what deal a consumer is getting and how and if it is affected by commission arrangements. For example, it may be less clear how broad the panel of suppliers are in situations around autoswitchers and bill splitters.

Ofgem’s review of the non-domestic market expanded protections for business consumers in this area. Current rules require that commission fees be clearly displayed in a contract’s principle terms, but these rules place the onus on suppliers to disclose, rather than TPIs. For other types of TPI, consumers must rely on general consumer protection legislation as laid down by the Consumer Protection from Unfair Trading Regulations (2008), which requires businesses to avoid misleading consumers. We would encourage Ofgem to consider introducing rules requiring disclosure of the number of suppliers a TPI can obtain quotes from, as well as upfront disclosure of both the presence of a commission fee and the cost.

Q18. What do you consider we should focus on when we regulate TPIs?

Ofgem should focus on achieving the best possible outcomes for consumers who make use of TPIs. In order to reach net zero, consumers will be required to pick up a wide range of new innovative practices. Consumers who do not trust their energy supplier are less likely to engage in these behaviours. Excellent customer service and well-managed innovation are key factors in winning consumer trust.[43] TPIs can make a unique contribution to the energy market by bridging the gap between consumers and suppliers. They can facilitate the spreading of new practices and technologies, if they have the trust of consumers.

However, the current TPI market generates poor outcomes for some consumers. Evidence from the UK Customer Satisfaction Index shows that 62% of customers believe that bad practice or behaviour by a company will damage its long-term reputation, and that an entire sector can be tarnished by the actions of one or a small number of companies.[44] Introducing minimum requirements will raise standards across the market. Increasing the quality of service a customer can expect to receive and the support and protection offered when they do not should be key cornerstones of Ofgem's approach to regulation, and will increase the trust consumers have in the energy market.

Above all, consumers will benefit from a TPI market which prioritises **transparency with consumers, clarity regarding contract terms, support for vulnerable consumers, and swift and proportionate enforcement action when rules are broken.** A necessary aspect of this is access to independent, high-quality advice for all TPI consumers. There is also a need for consumer advocacy and continuous monitoring of this market to ensure that TPIs are meeting the minimum standards laid out by Ofgem, and that they remain fit for purpose.

Ofgem should:

- Clearly designate authorised activities for a range of TPIs subject to regulation;
- Introduce rules which ban misrepresentation and restrict predatory contracting practices;

[43] Citizens Advice (2024) Regulating Third Party Intermediaries (TPIs) in the retail energy market: Citizens Advice response
[44] Ibid.

- Introduce a 14-day cooling-off period for small non-domestic consumers;
- Introduce reporting requirements for TPIs, proportionate to their level of involvement in a consumer's energy supply;
- Use the FCA's approach to regulating insurance brokers as a case study of successful regulation in a highly variable market.

Q19. Is there any other information you wish to provide that is not covered in the above questions that will inform our review of the TPI sector? Please provide your additional points.

Not answered.