

Ofgem Consumer First Panel

Reporting on the expectations of Price Comparison Tools (PCTs)
June 2016



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1 Summary

The Ofgem Consumer First Panel consists of around 80 consumers who meet three times over a year to discuss their views of key energy issues and their impact on consumers across Great Britain. Since 2007, feedback from the Consumer First Panel has helped ensure the consumer voice is heard in Ofgem's policy making process.

This report summarises the findings from the third and final wave of the 2015/16 Consumer First Panel.

1.1 Background and objectives

Price Comparison Tools (PCTs) offer energy consumers the ability to compare prices across tariffs and energy suppliers, and complete the switch through the website. Twelve sites are currently accredited by the 'Confidence Code', a voluntary code of practice that governs independent energy price comparison sites, administered by Ofgem.

Ofgem committed to reviewing the Confidence Code in its 2014-15 corporate plan, and further committed to monitoring the impacts of the 2015 code change. In its energy market investigation Provisional Decision on Remedies¹, the Competition and Markets Authority proposed that the 'Whole of Market' requirement (which requires PCTs to show a comparison of the whole market to consumers) should be removed from the Confidence Code due to a risk of undermining competition. As a result, Ofgem is also reviewing the Code in 2016, with a particular focus on considering the Whole of Market requirement.

The aims for this year's third and final wave of Panel events were therefore to explore the following:

- What do consumers expect from PCTs?
- Which principles do they think should underlie the Confidence Code?
 - Do consumers understand the current principles?
 - Is anything missing from the current list?
 - What are the most important principles?
- What, if anything, would provide reassurance for consumers in the absence of the Whole of Market (WoM) requirement?
- How much value do consumers place on the auditing of PCTs?
- How important is transparency in relation to special deals with suppliers?
- How much effort would consumers be prepared to put in to check whether the tariff is the best available to them or personalise the tariffs and deals offered to them?

The research was intended to capture a wide consumer perspective, from both those who had and had not used PCTs.

1.2 Methodology

A deliberative approach was used in order to give participants the freedom to express their views within a framework that helps build their knowledge of an issue or topic. This provides insight into why participants have certain views. It is important to note that Panel research is intended to be illustrative rather than

¹ CMA (2016), Energy Market Investigation Provisional Decision on Remedies, pp. 357-364, available at <https://assets.digital.cabinet-office.gov.uk/media/5706757340f0b6038800003b/Provisional-decision-on-remedies-EMI.pdf>

statistically reliable and, as such, does not permit conclusions to be drawn about the extent to which something is happening in the wider population.

In total 57 Panellists returned to the third and final wave of workshops. They were recruited to broadly reflect the full range of energy consumers in Great Britain. Workshops of three hours took place between the 2nd and the 10th of March 2016 across four locations: Cardiff, Peterborough, Exeter and Dumfries. Workshops allowed Panellists enough time to express their views, share and deliberate with others.

1.3 Key findings

Underlying attitudes and expectations of PCTs

- Panellists' use of any type of PCT varied, with a few using them frequently, some occasionally and many never at all. Satisfaction with PCTs across all markets was mixed. Although some welcomed the ability to compare a large number of companies at once, others found it generally difficult to navigate results and compare prices for different products and services.
- Most Panellists were unfamiliar with using PCTs for energy. Those who were aware that it was possible to switch directly through a PCT were not confident that this would be cheaper or as smooth a process as contacting a supplier directly. Awareness of Ofgem's Confidence Code was low; however, on seeing the logo, Panellists did assume that the Code was some form of 'seal of approval' for PCTs which would give them more trust and confidence in using any PCT that displayed the logo.
- Panellists' attitudes towards PCTs in the energy market were based on a number of perceptions and assumptions about how PCTs worked across other markets. They held the following underlying views:
 - **Users consult multiple PCTs for the same search query:** this is based on the assumption that not all companies are covered by each tool and that some PCTs have commercial relationships with different companies.
 - **The best deals are available directly with companies, not through PCTs:** most Panellists cited experiences of getting a better deal than those they had seen quoted online by contacting a company directly.
 - **PCTs are used to get a 'better' deal, not the 'best' deal:** Panellists were content with making a significant, rather than the maximum, saving with as little effort as possible.
 - **It's not always about price:** Whilst some were primarily driven by price, others did not feel comfortable always selecting the cheapest offer and placed greater importance on other factors such as customer service.
 - **PCT results can be confusing to navigate:** Panellists generally felt that the navigation of results could be improved; those who had little exposure to PCTs felt it could be overwhelming to try and compare different companies.
 - **PCTs are marketing tools:** Panellists were also concerned that any personal details they enter as part of the PCT process could be used by the PCT or other companies to send marketing materials.

These assumptions are important for understanding Panellists' reactions to, and preferences for, the principles contained within the Confidence Code.

- Panellists spontaneously identified a number of broad principles that they said were important for PCTs to follow in meeting the needs of consumers. Firstly, Panellists felt that it was crucial to have correct, up to date and clear information – not just on price, but also on other details of the offer such as cancellation fees. Panellists also requested an experience that was both tailored to their circumstances and easy to understand. They acknowledged that there may be a tension in delivering both but hoped that PCTs would be able to offer just the right amount of information to help consumers make an informed choice prior to switching, yet not so much that ease of use is compromised. Finally, Panellists wanted objective and impartial information, and felt it was important to ensure that results were presented based purely on the best interests of the user, rather than biased in any way towards some suppliers or tariffs.

Reviewing principles within the Code

- Panellists were asked for their views on nine specific principles that PCTs should follow.² These were identified by Ofgem and taken from both the current Code and wider European guidelines. Panellists felt that these principles broadly reflected those which they had identified spontaneously themselves. Most found it hard to decide which were the most important, with many stating that all principles were equally important.
- Assessment of relative importance was made from a number of perspectives, these included: whether Panellists understood the practical application of the principle; whether they felt the aim of the principle was relevant to them; whether they felt that the goal of the principle would happen naturally outside of the Code; and, whether the concept of the principle was covered by another principle.

Correctness, accuracy and clarity

- Panellists consistently identified ‘**correctness and accuracy**’ and ‘**clarity and understanding**’ as among the principles they considered to be the most important. Clear, accurate and correct information was seen to be critical to the PCT experience in enabling comparisons between suppliers and deals – these principles were essential for a PCT to be trustworthy, usable and helpful. Without this, Panellists felt that other principles, such as user friendliness, were less valuable to consumers.
- Although there was some uncertainty about the difference between these two principles, Panellists felt that there was room for improvement in both areas. This was in part driven by an assumption that cheaper deals were available by contacting suppliers directly and thus PCTs may not have the most up to date information.
- In principle, Panellists were supportive of the need to audit PCTs to ensure that information was clear, correct and accurate; however only a few were prepared to contribute to the current costs or to cover the cost of a more comprehensive auditing system. Panellists had no strong views on the frequency or depth of auditing required, but felt that the cost was something the PCTs should incur given the perceived increase in use that would be generated by accreditation.

² These were: independence, transparency, whole of market, clarity and understanding of results, correctness and accuracy, user friendliness, accessibility of service, customer empowerment, and reliability.

Independence

- Panellists also identified '**independence**' as a key principle for the Code to uphold. Awareness of potential commercial relationships between PCTs and suppliers was low; however, in principle Panellists were cautious about any relationship that might reduce consumer choice, influence the content of the information provided, or change the way information was presented to consumers. Instead, they felt it was important to receive impartial information that could help them make an informed choice.
- Given that Panellists felt consumers were looking for a better deal rather than the best deal, and given that price was not always the key driver of choice, Panellists opted for a scenario in which PCTs were fully independent over one in which they may be able to offer cheaper deals through relationships with supplier. Most Panellists prioritised the reassurance that information presented by PCTs was impartial, and the convenience of not needing to compare across multiple PCTs with different commercial relationships, over the potential cost savings of exclusive deals only available through specific PCTs.

Other principles

- Panellists gave relatively less importance to the principle of '**transparency**'. Although it was seen as important for PCTs to be open and honest about any commercial relationships that they might have; Panellists felt that transparency was less relevant if PCTs were completely independent from suppliers (this was a clear preference) and thus there were no relationships to be transparent about.
- '**Accessibility**' was also seen as relatively less important because Panellists felt that it was not as relevant to their own personal needs from PCTs, such as having accurate and impartial information. Furthermore, they assumed that the goals of this principle would be covered by a general principle of user friendliness to ensure that the service could be used by a wide range of consumers.
- Panellists were unsure how the principle of '**customer empowerment**' meant in practices for them, and what would happen to their user experience if this was not in place. Many felt that they would be empowered if PCTs upheld other principles to present them with accurate and impartial information in a tailored yet user-friendly way, and that they would be able to get access to any further information they required by using an internet search engine.
- Panellists were comfortable with the concept of '**user friendliness**', and felt that this was critical to the PCT service; however felt that this would be applied successfully by PCTs outside of the Code as a result of competition between PCTs for traffic to their websites.
- Panellists were unsure how distinctive '**reliability**' was from the principle of 'correctness and accuracy', and assumed that information that was already accurate, correct, clear and impartial was by definition reliable to use.

Complete overview of the market (Whole of Market)

- The concepts covered by the principle of '**Whole of Market**' were new to Panellists. Due to limited experience of PCTs in the energy market, Panellists found it difficult to understand the implication of not presenting consumers with the whole of the market.

- On prompting, Panellists were clear that the risk of not showing the full market was that they may miss out on seeing a cheaper deal; however even so, the perceived value of this principle was mixed. Although some felt this would give them more control over their decision making, others were concerned that navigating search results could be overwhelming. Furthermore, some Panellists felt that seeing the whole of the market by default was less important than a request to tailor and filter results to consumer preferences – including those who were only interested in suppliers they could switch through via the PCT. Panellists therefore wanted to be given the choice to decide whether or not they would like to see the whole market.
- In the absence of Whole of Market, and where commissioning relationships between suppliers and PCTs were in place, Panellists favoured greater transparency to help them judge how good their deal could be within the wider market. However, although having an independent assessment of PCTs or an independent list of all tariffs were well received, Panellists were concerned that these could add confusion and create a further step and layer of information that they would need to consult before switching. Panellists were most supportive of information that was displayed whilst using the PCT over information that was held elsewhere (such as through an independent list of suppliers and tariffs). This information should be easy to evaluate, such as stating which suppliers are (and are not) covered by the tool, rather than a percentage of the market covered which Panellists found more difficult to interpret.

2 Introduction and background

In April 2015, Ofgem commissioned Ipsos MORI to conduct research with a refreshed Consumer First Panel. The Ofgem Consumer First Panel consists of around 80 consumers who meet three times over a year to discuss their views of key energy issues and their impact on consumers across Great Britain. Since 2007, feedback from the Consumer First Panel has helped ensure the consumer voice is heard in Ofgem's policy making process.

This report summarises the findings from the third and final wave of the 2015/16 Panel which took place between the 2nd and the 10th of March 2016 across four locations: Cardiff, Peterborough, Exeter and Dumfries.

2.1 Background

Price Comparison Tools (PCTs) offer energy consumers the ability to compare prices across tariffs and energy suppliers, and complete a switch through the website. It is understood that there are many PCTs available online for energy customers. The majority are smaller sites with significantly less traffic compared with the larger well-known brands. Twelve sites are currently accredited by the 'Confidence Code', a voluntary code of practice that governs independent energy price comparison sites, administered by Ofgem.

Abiding by the Code means that accredited sites must meet standards on how tariffs are displayed. This is to ensure that consumers can be confident they can find the best deals in the market. PCTs also have to show very clearly which energy companies they have commission arrangements with, and also make it apparent that they can earn commission on certain supplier's tariffs.

The sites covered by the Confidence Code act independently of suppliers, so customers can be sure that when they are presented with options and prices, they have been calculated and are displayed in a fair and unbiased way. They also give detailed information on each tariff, including gas and electricity unit prices and any discounts that are available.

Ofgem committed to reviewing the Confidence Code in its 2014-15 corporate plan. The aim was to improve the code to ensure consumers using accredited sites receive an independent, transparent, accurate and reliable service. The review brought about changes in early 2015 around the Whole of Market (WoM) requirement. This is a requirement for Confidence Code accredited PCTs to show a comparison of the whole market to consumers. Prior to the review, the onus was on consumers to opt to see all available tariffs. The review required sites to show all available tariffs by default, unless consumers made an informed and active choice not to see the whole market.

Ofgem committed to monitoring the impacts of the 2015 code change. In its energy market investigation Provisional Decision on Remedies³, the Competition and Markets Authority (CMA) proposed that the WoM requirement should be removed from the Confidence Code due to a risk of undermining competition. As a result, Ofgem has committed to reviewing the Code again in 2016, with a particular focus on considering the Whole of Market requirement.

³ CMA (2016), Energy Market Investigation Provisional Decision on Remedies, pp. 357-364, available at <https://assets.digital.cabinet-office.gov.uk/media/5706757340f0b6038800003b/Provisional-decision-on-remedies-EMI.pdf>

Definition

The Whole of Market (WoM) principle requires that Price Comparison Tools (PCTs) should show a WoM comparison to consumers unless they make an active and informed choice to see a smaller number of tariffs. Applying this principle, the Confidence Code currently requires PCTs to list all tariffs and all suppliers on their sites regardless of whether they have a commission arrangement with all suppliers or not.

When introducing this principle, Panellists were shown the following description:

Complete Overview (Whole of Market): Price Comparison Tools (PCTs) should aim at giving all information/showing all tariffs to the customer at first by default, before allowing customers to filter and sort results.

2.2 Objectives

The aims for this year's third and final wave of Panel events were to explore the following:

- What do consumers expect from PCTs?
- Which principles do they think should underlie the Confidence Code?
 - Do consumers understand the current principles?
 - Is anything missing from the current list?
 - What are the most important principles?
- What, if anything, would provide reassurance for consumers in the absence of the Whole of Market (WoM) requirement?
- How much value do consumers place on the auditing of PCTs?
- How important is transparency in relation to special deals with suppliers?
- How much effort would consumers be prepared to put in to check whether the tariff is the best available to them or personalise the tariffs and deals offered to them?

The research was intended to capture a wide consumer perspective, from both those who had and had not used PCTs.

Panellists were presented with nine principles, broadly reflecting the principles covered by the current Confidence Code and wider European guidance. These were:

- **Independence:** A Price Comparison Tool (PCT) should be independent and aim to give a non-discriminatory overview of the market and present all information in a consistent way.
- **Transparency:** Price Comparison Tools (PCTs) should disclose the way they operate, their funding and their owners/shareholders.

- **Complete Overview (Whole of Market):** Price Comparison Tools (PCTs) should aim at giving all information/showing all tariffs to the customer at first by default, before allowing customers to filter and sort results.
- **Clarity and understanding of results:** The results generated should be presented in a clear way e.g. fundamental characteristics, such as: fixed tariff versus floating price products, contract type, contract duration and energy mix of all products should be easily recognisable on the first page of result screen.
- **Correctness and accuracy:** The information provided in results and used for comparisons should be updated as often as necessary so that prices and options are correct and reflect what is available on the market.
- **User Friendliness:** The user should be offered help through default consumption patterns or, preferably, a tool that calculates the approximate consumption, based on the amount of the last bill or on the basis of other information available to the user.
- **Accessibility of service:** Online Price Comparison Tools should follow Web Accessibility Guidelines (WAG) and provide another channel (other than the internet) through which customers can access the service. The WAGs aim to make web content more accessible to users, especially disabled users, by recommending appropriate standards relating to text, images and other media.
- **Customer empowerment:** Price Comparison Tools should consider how best to empower customers to use their service and they should make appropriate choices for their needs. For example sites may provide further information on the energy market or links to useful independent sources of information on energy topics (e.g. energy efficiency).
- **Reliability:** The services should be reliable and robust – this refers to the reliability of both the information provided to customers and the Price Comparison Tool's processes. For example, the PCTs processes for facilitating a switch should be reliable and where an issue occurs there should be processes in place to make a complaint and get the issue resolved.

2.3 Methodology

A deliberative approach was used in order to give participants the freedom to express their views within a framework that helps build their knowledge in the area. Qualitative research, including deliberative approaches such as the Consumer First Panel, provide a thorough understanding of the current consumer perspective on complex issues that consumers may have never thought about before. It also allows for a more in-depth exploration of consumers' experiences and understanding of some topics. This provides insight into why participants have certain views. It is important to note that Panel research is intended to be illustrative rather than statistically reliable and, as such, does not permit conclusions to be drawn about the extent to which something is happening in the wider population.

Throughout the report, verbatim comments have been included to illustrate particular viewpoints. It is important to remember that the views expressed do not always represent the views of all participants. In general, verbatim comments have been included to illustrate where there was a particular strength of feeling during discussions.

Discussions lasted about one and a half hours, allowing Panellists enough time to express their opinions and then to share and discuss these with others. A range of techniques were used in the workshop discussions:

- Individual / paired / group discussions.
- A presentation that covered the basics of how PCTs operate online and the principles that they have to abide by.
- A prioritisation exercise to identify which principles were the most and least important.
- Illustrative examples of how WoM operates.

2.4 Sampling and recruitment

Panellists were recruited to broadly reflect the full range of energy consumers in Great Britain. All participants recruited were solely or jointly responsible for their household's energy bills.

In addition, the following was controlled for at the recruitment stage:

- Age
- Gender
- Ethnicity
- Disability
- Tenure
- Urban/rural
- Employment status
- Social grade
- Fuel poverty
- Internet use/access
- Electricity only
- Payment type
- Meter type
- Current supplier
- Switched supplier
- Considered switching supplier
- Changed tariff with current supplier
- Considered changing tariff with current supplier

In total, 57 Panellists returned to the third and final event.

3 Underlying attitudes and expectations of PCTs

Before discussing the underlying principles of the Confidence Code, Panellists talked about their general use and experience of PCTs across a range of different services. We asked Panellists the following questions:

- 1 When and how have you used PCTs?
- 2 What is your overall opinion of PCTs?
- 3 Do you trust PCTs?
- 4 What is your experience of PCTs in the energy market?

This chapter draws on Panellists' responses to these questions. The underlying experiences and attitudes that emerged were key to understanding Panellists' views on the Confidence Code and specific principles.

3.1 Use of PCTs

Use of PCTs across all markets

Panellists' use of any type of PCT varied, with a few using them frequently, some occasionally and many never at all. Older Panellists and those who lived in more rural areas were the least familiar with PCTs. This was generally because they did not have access to, or rarely used the internet. Instead, these Panellists would often consult multiple companies directly, or used face to face comparison tools (such as travel agents or mobile phone shops) to help them compare products and services. Panellists were most likely to consult PCTs when prompted by a renewal quote, such as for insurance, mobile phone deals or breakdown cover. Others liked to consult them ahead of booking holidays, hotel deals and flights.

Satisfaction with PCTs, across all markets, was mixed. Some Panellists found them useful and had positive experiences. They felt that PCTs could take the hassle out of finding a deal by allowing customers to compare a large number of companies at once, and that they helped to ensure consumers could find competitive quotes. A small number perceived that PCTs showed 'real time' prices, so they accurately reflected market prices. Some also noted that online PCTs have the ability to store historical data from the last visit, which could be used by consumers at a later date. Finally, it was felt that PCTs could provide immediate confirmation of deals and having this was deemed to be important.

"Information is power, the more you have the better armed you are"

Some Panellists had less positive experiences when using PCTs across different markets. Their concerns focussed on ability to navigate results, compare deals and the lack of clarity around which company ultimately provides services (where this is different from the company or brand they thought they would be dealing with). They also did not like being marketed to, either directly through the search results or through emails at a later date.

Use of PCTs for energy

Most Panellists were unfamiliar with using PCTs for energy. Only a handful had consulted energy PCTs, and a very small number had used them to actually switch supplier. In general, Panellists who had used PCTs for energy saw them as a way to gauge what deals were currently available, rather than directly switch through them. Some Panellists were aware that they could do this through a PCT, but were not confident that this would be cheaper or as smooth a process as contacting a supplier directly.

“I knew that you could compare but not that you could do it (switching) online, I thought that you had to ring them”

3.2 Assumptions and attitudes of PCTs

Given that only a small number of Panellists had direct experience of energy PCTs, many needed to draw on their wider experience of PCTs in general. Panellists’ attitudes towards PCTs in the energy market were based on a number of perceptions and assumptions of how PCTs worked across other markets. These can be summarised as followed:

1. Users consult multiple PCTs for the same search query

Panellists said they often accessed more than one PCT when comparing prices and looking for deals. Some Panellists were concerned that PCTs may have relationships with specific companies, and as a result, believed that customers may not be seeing all the deals on offer, or seeing different prices across different PCTs. Only after consulting multiple PCTs, and then visiting individual company websites, would many Panellists decide to make a purchase or choose a contract.

“Between different comparison sites, you get different prices”

2. The best deals are available directly with companies, not through PCTs

Most Panellists said they tended to look at the PCTs to compare different deals, but would then contact companies directly to see if they could match or beat the PCT’s price. There was a general perception that better deals were available only by going directly to the company, rather than accepting the price shown on a PCT. Panellists had experiences of companies undercutting or matching competitor prices which were below what they had seen on PCTs. They thought that if different costs are presented on different PCTs, then there must be room for price negotiations if they contact the company directly.

“I always use the price comparison to look at the deals that you can do and then I challenge my (insurance) supplier to match the price on that”

3. PCTs are used to get a better deal, not the ‘best’ deal

Panellists generally used PCTs to help them search for a better deal than they were currently receiving, rather than to identify the very best deal on offer. As such, there was a perceived trade-off between the amount of effort required to compare deals, and the savings made. Most Panellists felt a sense of diminishing returns by spending more time comparing deals. They were content with making a significant, rather than maximum, saving with as little effort as possible.

“You don’t know if you have ‘the best’ deal because it’s too complicated. It’s not about having the best deal - it’s just about paying less than what you’re paying at the moment”

4. It’s not always about price

Price was not necessarily the only driver for Panellists when they were choosing a service or product. Some Panellists were cautious about opting for the cheapest offer due to a perception that it will be reflective of poor customer service. Whilst some Panellists were primarily driven by price; others considered price alongside other factors, such as length of contract and customer service.

“You can use a PCT and make the decision; do I want to go with the cheapest one? ... I might not necessarily go for the cheapest, but one that’s pretty cheap but the customer service is good. I’ll check the ratings of the customer service and reviews. It’s not always about the cheapest, it’s about quality’.

5. PCT results can be confusing to navigate

Most Panellists thought that results were hard to compare across multiple variables – such as price, cancellation fee or length of contract. For some, the variety of companies and prices can be overwhelming, and interpreting the results across more than just price can be a difficult task. For others, it can be hard to identify some of the finer details of contract, such as length, cancellation costs and relationship between broker and supplier. This perception was particularly prevalent among those who had little exposure to PCTs.

“I don’t like them (PCTs), they’re overwhelming and complex. There were too many numbers”

6. PCTs are marketing tools

Panellists were concerned that they often had to enter their personal details on PCTs and feared that they would be bombarded with marketing emails and letters as a consequence. For some, a request to give an email address before viewing results acted as a barrier to using PCTs. Panellists did not always appreciate that the provision of address details could help identify which services might be specifically available within that local area.

“All they said to me was put in your postcode and this bore no relationship to what I’m actually doing. I gave up.”

3.3 Spontaneous PCT principles

Panellists were asked what features they wanted from a PCT, and the principles that energy PCTs should follow to meet the needs of their users. Given the relatively low use of PCTs across all four locations, most Panellists found it difficult to think about their own specific set of guidelines for PCTs. However, they were able to identify broad principles that fell under one of five different categories:

- **Correct, up to date and clear information:**

Panellists felt it was crucial that prices were correct and updated regularly. This developed from the perception from other markets that the price quoted by companies when customers contacted them

directly sometimes differed to that which they saw online. Some perceived that this was, in part, because the information on PCTs was out of date, and felt that the cost advertised online should reflect the best possible price offered by a company.

A basic requirement for having trust in PCTs was showing correct prices and clear information. In addition to price, Panellists also wanted clarification of the terms of the contracts presented. This includes details of the specific supplier, any cancellation fees, the length of contract and customer reviews and ratings. Panellists were not always looking for the 'cheapest' deal, but the one that meets their personal requirements and where reviews could provide the detailed information about the quality of service that they are looking for.

- **Tailored results:**

There was a strong preference for results that were tailored to the customers' individual preferences. Panellists stated that they did not want to have to sift through results that were irrelevant to their personal needs. Instead, they requested that there should be an option for them to select, for example, their preferred type of tariff or only suppliers with green credentials, or contracts with no cancellation fee.

- **User friendliness:**

Ease of use was also a priority. A user friendly PCT is one which is easily navigated, has as few stages as possible in both the comparison and switching process, and requires the minimal amount of personal information to be entered at the initial stage.

Panellists acknowledged that there was a tension between wanting a PCT to be user friendly, but to also have the tailoring and detail as mentioned above. It was felt that PCTs should therefore have just the right amount of information available so that consumers can make an informed decision prior to switching (for example length of contract or cancellation fees), yet not so much information that ease of use becomes compromised. One way of navigating this tension was to ensure that information is organised in a format that can be tailored to the user's preference.

- **Independence:**

Panellists felt it was important to ensure that results were presented based purely on the best interests of the user, and that results were not biased in any way towards some suppliers or tariffs over any others. There was a general scepticism about adverts or recommendations that appeared on results pages – such as putting forward 'preferred suppliers' or 'popular suppliers in your area'. Panellists were unclear how these were calculated and suspected that they would not be objective. If PCTs were not transparent about affiliations with suppliers, then these features were seen as a marker of them not being independent.

3.4 Confidence Code

Awareness of Ofgem's Confidence Code was low. No Panellists recognised the logo. However, on seeing it, they did assume that the Code was a 'seal of approval' for PCTs. The Code being overseen by Ofgem (as a perceived proxy for independent government organisation) was seen as a positive. Panellists felt they would have more confidence and trust in using PCTs that were signed up to it. Some felt if a PCT displayed the Code logo, it would reassure consumers that the PCTs were trustworthy and could be held

to account by someone. However, none of the Panellists that had used a PCT for energy had proactively checked to see if a PCT was accredited in this way.

Figure 1: Confidence Code logo



As noted above, the Code is voluntary. Some Panellists questioned the value of the Code if PCTs could opt in or out of abiding by it. Concerns were raised about how consumers could identify those that had not signed up to the Code out of choice, or those that had not been approved.

4 Principles

Panellists were asked for their views on nine specific principles that PCTs should follow. These were identified by Ofgem and taken from both the current Code⁴ and wider European guidelines⁵ for PCTs. Panellists were presented with the following descriptions of these principles:

- **Independence:** A Price Comparison Tool (PCT) should be independent and aim to give a non-discriminatory overview of the market and present all information in a consistent way.
- **Transparency:** Price Comparison Tools (PCTs) should disclose the way they operate, their funding and their owners/shareholders.
- **Complete Overview (Whole of Market):** Price Comparison Tools (PCTs) should aim at giving all information/showing all tariffs to the customer at first by default, before allowing customers to filter and sort results.
- **Clarity and understanding of results:** The results generated should be presented in a clear way e.g. fundamental characteristics, such as: fixed tariff versus floating price products, contract type, contract duration and energy mix of all products should be easily recognisable on the first page of result screen.
- **Correctness and accuracy:** The information provided in results and used for comparisons should be updated as often as necessary so that prices and options are correct and reflect what is available on the market.
- **User friendliness:** The user should be offered help through default consumption patterns or, preferably, a tool that calculates the approximate consumption, based on the amount of the last bill or on the basis of other information available to the user.
- **Accessibility of service:** Online Price Comparison Tools should follow Web Accessibility Guidelines (WAG) and provide another channel (other than the internet) through which customers can access the service. The WAGs aim to make web content more accessible to users, especially disabled users, by recommending appropriate standards relating to text, images and other media.
- **Customer empowerment:** Price Comparison Tools should consider how best to empower customers to use their service and they should make appropriate choices for their needs. For example sites may provide further information on the energy market or links to useful independent sources of information on energy topics (e.g. energy efficiency).
- **Reliability:** The services should be reliable and robust – this refers to the reliability of both the information provided to customers and the Price Comparison Tool's processes. For example, the

⁴ Ofgem, Confidence Code – code of practice for online domestic price comparison sites, found at: <https://www.ofgem.gov.uk/publications-and-updates/confidence-code-code-practice-online-domestic-price-comparison-services-0>

⁵ Council of European Energy Regulators, Guidelines of Good Practice on Price Comparison Tools, found at: http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/Tab3/C12-CEM-54-03_GGP-PCT_09Jul2012.pdf

PCT's processes for facilitating a switch should be reliable and where an issue occurs there should be processes in place to make a complaint and get the issue resolved.

As part of the sessions, Panellists were asked which of these principles were the most and least important in their view. This was followed by in-depth discussions to explore the rationale behind their choices. They then explored in greater detail the specific application of the independence, correctness and accuracy principles and implications of the 'Whole of Market' principle.

Panellists recognised that the principles they had spontaneously identified earlier in the sessions broadly reflected the principles in the Confidence Code. They found it hard to decide which of the nine principles were the most important for PCTs to adhere to, with many stating they were all equally as important. It was also difficult for Panellists to identify which of the principles were least important. Often, those of less importance were selected because they were felt to be less relevant to individual Panellists, or because they were thought to overlap with other principles.

"None of these are the least important though, they're all significant"

4.1 Evaluating principles

Panellists made their judgements on what was important/not important based on either the relative importance or their relative interest in comparison to other principles. Most Panellists instinctively had a preference or personal interest in a small number of specific principles.

Panellists made decisions on the importance of principles from a number of different perspectives:

- **Do I understand the practical application of the principle?** On the whole Panellists had little experience with PCTs, so therefore struggled with how some of the principles were applied in practice or what the practical repercussions may be for consumers. This is most relevant to 'Whole of the Market' and 'customer empowerment' principles, where the direct impact on users of PCTs was poorly understood.
- **Is the aim of the principle relevant?** Panellists were most likely to identify with principles that were tangible and relevant to them. As discussed later in the chapter, 'correctness and accuracy' and 'clarity and understanding' were crucial to most Panellists as they could see how this would be essential to their navigation of PCTs and ability to make a decision based on the search results. In contrast, most Panellists felt that 'accessibility' was not relevant for their own personal circumstances.
- **Would this happen naturally outside of the Code?** This was particularly relevant to the principle of 'user friendliness', which Panellists felt would be important to PCTs regardless of the Code. This perspective was also important for 'clarity of information' which was a principle Panellists felt PCTs could improve on.
- **Is this concept covered by other principles?** Panellists placed less emphasis on principles that they felt were already covered by others, or were perceived as dependent on performance against other measures. Some Panellists felt that there was a significant overlap between the following principles:
 - 'Correctness and accuracy' vs. 'clarity and understanding' vs. 'reliability'

- ‘Independence’ vs. ‘transparency’
- ‘User friendliness’ vs. ‘accessibility’

4.2 Principles identified as the most important

Across all four locations, Panellists consistently identified ‘correctness and accuracy’, ‘clarity and understanding’ and ‘independence’ as the principles they considered to be the most important.

‘Correctness and accuracy’ and ‘clarity and understanding’

Panellists were familiar with the concept of information being clear, accurate and correct. They perceived that this was relevant to all types of information provided by a PCT, including details of the supplier deals on offer, and information about the PCT itself. Particular attention was placed on the phrasing of the description; *comparisons should be updated as often as necessary* – there was some confusion about the definition of ‘necessary’ and the extent to which this asked PCTs to update prices in real time. Providing ‘live’ prices was deemed to be one of the crucial factors in maintaining fair and relevant prices. This would help Panellists feel reassured that they are getting as good a deal as they may get through another PCT or by going directly to the supplier. As noted above, some Panellists assumed that the reason for discrepancy between online advertised prices and those quoted when they contact suppliers directly is due to PCTs not having the most up to date and accurate information from suppliers.

‘Correctness and accuracy’ was seen as important because having the correct information was crucial to the PCT experience. Without this, Panellists felt that the other principles were less valuable to the user experience and the core functionality of being able to compare energy deals.

“This (having up to date information) would negate the need for me to call and get the best price”

“It (prices) should be updated immediately - equal to stock exchange”

Based on their experience of PCTs across all markets, Panellists believed that PCTs could often be unclear, cluttered and hard to understand. This contributed to their reasoning for selecting principles of correctness and clarity as the most important. Many felt that the benefit of using PCTs was to avoid the need to contacting multiple suppliers directly. Having correct and accurate information would make the whole process smoother and reassure consumers that they would not have to use a comparison site to compare results from other comparison sites.

There was deemed to be overlap between ‘clarity and understanding’ and ‘correctness and accuracy’ because both infer that PCTs should be honest and upfront about supplier relationships, and provide clear information about the deals offered by suppliers. Some Panellists stated that ‘clarity and understanding’ was important because they liked the idea of all products being easily understandable on the first page of the result screen. There was also a preference for clear language that was easy to interpret and understand; jargon and technical language should be kept to a minimum.

“Being upfront is important. They (PCTs) should be hiding the rubbish”

Independence

Panellists understood 'independence' to refer to the potential commercial relationship between suppliers and PCTs. Whilst some were aware that relationships between suppliers and PCTs could be in place; others were surprised that not all PCTs were independent of suppliers. Panellists were naturally suspicious about these relationships, and were unsure how or why these were formed.

In principle, Panellists were cautious about any relationships that might reduce consumer choice, influence the content of the information provided, or change the way information was presented to consumers. An independent PCT was thought to be trustworthy because consumers could be reassured that there was no bias on the part of the PCT to promote particular deals or suppliers. Panellists valued information that is reliable and impartial because this would give them confidence that they had seen all the information necessary to compare prices and make an informed choice.

As discussed further below in section 4.6, 'independence' was seen as more important than 'transparency'. Only in scenarios where PCTs had commercial relationships with suppliers did it then become more important for PCTs to be transparent about their relationships with suppliers.

“Independence is saying that there’s nobody behind it pushing you one way or another..... This is fundamental for a middleman, rather than for the supplier”

4.3 Principles identified as the least important

Panellists thought that 'transparency', 'accessibility' and 'customer empowerment' were relatively less important than the other six principles.

Transparency

Panellists were comfortable with the concept of 'transparency' and believed this to mean that PCTs would be open and honest about their finances, processes for collecting and analysing search results, and the details of specific deals offered by suppliers (for example showing cancellation fees). As noted previously, Panellists assumed that not all suppliers were available on all PCTs, and thus 'transparency' also included reference to which suppliers were present within search results. However, most were unaware that PCTs could enter into commercial relationships with suppliers.

Where PCTs do have relationships with specific suppliers, or do not cover the whole of the market, then Panellists felt that PCTs should be clear about this. Under such circumstances, Panellists felt that PCTs may market certain supplier's prices and tariffs in preference to others, and thus 'transparency' was important because it would help consumers judge impartiality.

However, 'transparency' was seen as less important compared to other principles because of its relationship to 'independence'. Given the lack of awareness in how PCTs operate Panellists assumed that no PCT had a commercial relationship with any supplier, and therefore did not need to be transparent about such relationships. Furthermore, as discussed later, if given the choice most Panellists would prefer a marketplace where PCTs were completely independent (and thus have less need to be transparent) rather than a scenario where PCTs might be able to offer cheaper deals because of commercial arrangements with suppliers.

“We thought it (transparency) is not really important,Independence means you don’t need as much transparency”

Accessibility

Panellists were comfortable with the concept of 'accessibility' and were familiar with the aims of Web Accessibility Guidelines (WAG); however they were unsure of the specific requirements that fell under these.

'Accessibility' was identified as being less important for a number of reasons. Firstly, Panellists felt that it was less relevant to them, and was detached from Panellists' immediate needs. They therefore prioritised other principles which they felt were core components of their needs from a PCT service (such as accuracy, user friendliness) over 'accessibility'.

Some Panellists felt 'accessibility' was less important because they assumed that core components of the principle (e.g. following WAG) would be covered by the principle of 'user friendliness'. Furthermore, they were not convinced that it was the responsibility of an online tool to deliver the service through another channel other than online. Some of those who were not internet savvy had used PCTs with the support of family and friends, but none had used a comparison tool through another channel and felt that this would have very low take up.

“For me it (accessibility) linked in with the user friendliness, I would have thought that anybody would have to comply with that”

Customer empowerment

Panellists were unsure what this principle meant in practice and what would happen to their user experience if this was not in place. Panellists struggled to see how PCTs could empower consumers beyond providing them with a good, accurate service as per the other principles. They therefore found it difficult to imagine what the added benefit of the 'customer empowerment' principle would offer. Many felt that they would be able to get access to any further information they required by using an internet search engine.

“It's a PCT and if I want to know about other aspects of the energy market then I can just google it”

Others felt this was less important because they found the concept of 'empowering customers' confusing. As long as PCTs did what they had been created to do, they would be empowering customers to compare deals and make informed decisions about their supplier.

4.4 Remaining principles

Panellists were relatively indifferent about principles that they thought had either been covered by others, they thought were already happening outside of the Code, or where the principle was not easily understood. These were 'user friendliness', 'reliability' and 'complete overview of the market (whole of market)'.

User friendliness

Panellists were comfortable with the concept and description given of 'user friendliness'. They understood this to be an assessment of how easy the site was to navigate and how easy it was to be able to compare energy deals.

Panellists did identify that user friendliness was one of the most important principles for PCTs initially. However, it became less of a priority when discussed in the context of the nine overarching principles. This was because Panellists considered this to be a fundamental component of the PCT business model, and that PCTs will already be ensuring that the user experience ensures that consumers use the tool. They assumed that 'user friendliness' would therefore be driven by competition between PCTs, so there was less of a need to prioritise this within the Code.

“If they don't make it user friendly then they're not going to get any customers. They're run to make it as user friendly as they can anyway”

Reliability

Panellists were unsure how distinctive 'reliability' was from the principle of 'correctness and accuracy'. The wording of the reliability principle shown to Panellists stated that: *The services should be reliable and robust – this refers to the reliability of both the information provided to customers and the Price Comparison Tool's processes.* As such, Panellists thought that the 'reliability of the information provided' would happen as a result of a PCT abiding to the principle of being 'correct and accurate'.

“Reliability's talking about the information provided, that the information itself is accurate and reliable”

Moreover, Panellists were unsure what the description meant in reference to 'reliable processes'. Many assumed that this referred to the process of switching via PCTs. However given few had done this, many felt that this was less relevant and found it difficult to imagine what this principle would guarantee in practice.

Complete overview of the market (whole of market)

The concepts covered by the principle of 'Whole of Market' were new to Panellists. There was some uncertainty as to whether 'whole market' truly meant that PCTs had access to data for all suppliers and tariffs. Panellists' experience of other markets was that not all companies or providers were present on PCTs, or that PCTs may choose not to show details for every supplier in the market. As such, they assumed that the 'whole of the market' principle would not necessarily give them the complete picture of what is available to them and help identify the 'best' deal across the market. Furthermore, some Panellists were unsure of the extent to which 'whole of the market' was necessary in circumstances where the PCT would be independent – they assumed that one mark of being independent was that all suppliers and tariffs would be included.

“I would think that it would be the majority (of suppliers on PCTs), but there may be one or two that aren't in there”

Due to limited experience, the implication of not presenting users with the whole of the market was often difficult to understand. Compared to the phrasing presented to introduce the principle (which emphasised the need to show all results before filtering), Panellists placed greater importance on a need to tailor results that were relevant to them rather than the perception that they might be 'overwhelmed' by seeing all suppliers and tariffs.

“You don’t want to know about the whole market. What’s the point in having the whole lot? ... Having the choice of filtering is more important”

4.5 Correctness, accuracy and clarity

Annual auditing of PCTs signed up to the Confidence Code is overseen by Ofgem to ensure that they are adhering to the agreed principles. One of the objectives of the third wave of the Panel was to explore how the principles of correctness, accuracy and clarity could be upheld through an auditing process. Panellists were asked to think about a number of different auditing options, including a model where consumers contributed to the cost of the audit.

Panellists emphasised that in order for a PCT to be trustworthy, usable and helpful in enabling them to compare deals, they need to provide clear, correct and accurate information. In part this is driven by necessity (without these principles being followed, few Panellists could see the point of using PCTs at all), but also by their experiences of PCTs in other markets and how these apply to the energy sector. In general, Panellists did not trust that the offers on PCT sites are always 'best and final' which made them uneasy about directly switching through them. There were also concerns that PCTs are not clear on the finer details of the offer such as length of contract and cancellation fees. Panellists requested information that goes beyond just price, such as metrics to measure customer service, to help them make informed decisions. If PCTs were completely accurate and up to date this would negate the need for Panellists to call suppliers directly to get a better deal.

“This is most important because not all sites are up to the minute and there could be a price up there for three months-it should be updated more often”

Most Panellists therefore wanted an independent organisation to ensure that PCTs are correct and accurate. As such, in principle, auditing of PCTs was important for Panellists. However only a few would be prepared to pay to contribute to current costs or to cover the cost of a more comprehensive auditing system. Most felt that the cost of auditing was something the PCTs should incur given that adherence to the Code would be good for their reputation and likely increase the number of users who would have more confidence in using a tool that had been accredited. Those who were willing to consider a small contribution to the cost of an audit were only willing to do so at the point of switching through a PCT in recognition of the service provided by the PCT. Panellists suggested spontaneously that a financial contribution just to view and compare results would be a barrier to engaging with PCTs.

“If I’m going just to look then I don’t want to pay, but if I’m going for the purpose of buying, to change my electricity supplier, change contract, then I would”

Panellists had no strong views on the frequency or depth of auditing required. The very existence of an auditing process was sufficient enough to reassure Panellists that they could trust the PCT. They assumed that any form of auditing would be good enough to establish whether a PCT was compliant with the Code.

4.6 Independence

Another objective was to explore the trade-off between a scenario where PCTs are completely independent and have no commercial arrangements with suppliers, and a scenario where PCTs might be able to offer cheaper deals because they had commercial arrangements with individual suppliers.

Overall independence was more important to Panellists than receiving cheaper deals. While they did want PCTs to be honest about any affiliations that they may have with suppliers so that consumers can make informed decisions, Panellists' preference was to receive results that were not biased in any way towards some suppliers or tariffs over any others. Instead, they requested impartial information about which deals were best for them.

“If it's not independent it's biased - I don't like them pushing certain deals”

Panellists were not always looking for the best deal, or were always driven by price. Panellists were sceptical about PCTs having special relationships with a particular supplier or suppliers as this would necessitate visiting multiple PCTs or having to refer to an overall comparison website to assess which PCT they should use.

“For me it is preferable that they are not trying to sell you a particular product without saying that there are other products out there”

“If I'm being sold to, I want to know I'm being sold to!”

After discussion, most Panellists prioritised the reassurance that information presented by PCTs was impartial, and the convenience of not needing to compare across multiple PCTs who might have different relationships with different suppliers, over the potential cost savings of exclusive deals only available through specific PCTs.

4.7 Whole of Market

Panellists were asked to explore the value they placed on the 'whole of market' principle, and to consider what could help users assess deals if it didn't exist.

Definition

The Whole of Market (WoM) principle requires that Price Comparison Tools (PCTs) should show a WoM comparison to consumers unless they make an active and informed choice to see a smaller number of tariffs. Applying this principle, the Confidence Code currently requires PCTs to list all tariffs and all suppliers on their sites regardless of whether they have a commission arrangement with all suppliers or not.

When introducing this principle, Panellists were shown the following description:

Complete Overview (Whole of Market): Price Comparison Tools (PCTs) should aim at giving all information/showing all tariffs to the customer at first by default, before allowing customers to filter and sort results.

The perceived value of the 'whole of market' principle was mixed. This was in part a reflection of the lack of experience Panellists had of using PCTs within the energy market. It was also due to their preferences when looking for deals that were **better** than current contract, but not necessarily the **'best'** deal.

Value of Whole Market

Some Panellists were clear that the risk of not showing the full market was that they may miss out on seeing a cheaper or better deal. Some wanted to be able to see the full market, and felt that this would give them more control over their decision making. Those in this group were comfortable with the idea of being able to rank and filter results based on their preferences. Some thought that comprehensive results should be ranked by cheapest first by default.

“If the only ones you can see are the ones that you can switch to what about the rates that they can’t switch to - they might be much cheaper.”

“That’s what I’m more used to when using websites such as eBay or something like that. I’m more used to seeing everything under the same search, I’m then refining my search more and that makes more sense to me to see everything and then you look closer or you change what you’re looking for.”

However, not everyone was aware that most PCTs allow users to filter results, so were put off by the perception that showing the 'whole market' would be difficult to navigate and overwhelming. This group were most likely to not be online or to have limited experience of PCTs across all markets.

“I wouldn’t (like to see the whole market). I can’t deal with so much information”

Others assumed that the 'whole market' would present them with types of contract or tariffs that they already knew they were not interested in. They therefore wanted to be able to filter and tailor their selection before seeing results. However, they wanted to be able to see the results for all suppliers that were relevant to their selection, regardless of whether the PCT benefitted financially through the switch.

Similarly, some were not keen on the 'whole of market' because they were only interested in the ease of switching through the PCT (they wanted to see results only for those suppliers to which they could switch to using the PCT). For others, brand and reputation was a key factor in their selection process (they were only interested in seeing a reduced list of the suppliers they were familiar with). These Panellists were not interested in identifying the very best deal; they already had some idea about their preferences and were only interested in identifying a better deal that met their needs. They therefore saw less relevance in the need to see the whole market.

“You don’t want to know about the whole market. What’s the point in having the whole lot?”

Despite these reservations based on personal preferences, Panellists wanted to be given the choice to decide whether or not they would like to see the whole of the market. They wanted users to have the power to define and refine their search query and make decisions for themselves. They did not want to be shown a reduced list of suppliers unknowingly based on a PCT’s commission arrangements. They also wanted to define other search criteria, such as length of contract, prior to seeing results.

Other mechanisms for assessing deals

Panellists were presented with a number of other mechanisms that could help them assess information presented on PCTs in the absence of the whole of market principle. These included an assessment or ranking of PCTs by an independent body, an independent list of tariffs, and clear information about the percentage of suppliers covered by each PCT.

Panellists broadly welcomed the concept of having an independent assessment or ranking of PCTs that could help them decide which PCT to use. In practice however, they were concerned that this would add a further layer of complexity to the comparison process and that they would be unlikely to refer to it when considering whether or not to switch. Some mentioned that they had seen independent commentaries comparing PCTs (such as on Which? or MoneySavingExpert), but were not in favour of a comprehensive assessment of each PCT. Panellists were concerned that this would lead to the need for comparison sites to compare comparison sites.

“I don’t think I’d go to an independent body to see if a PCT was the most efficient”

“In my head I think checking a comparison site for a comparison site, who’s comparing the comparers? You think when does it stop?”

In each of the four locations, there was initial support for the concept of an independent list of tariffs which would provide a reference point for the price of energy for all suppliers and tariffs. This was in part driven by the perceptions that the PCTs do not have (or do not show) details for all suppliers and tariffs. However, Panellists had assumed that an independent list could still be filtered to match their needs and were less sure how helpful this would be without the ability to tailor the list to those suppliers and tariffs relevant to them. They asked that any tool for comparing energy deals was able to show them the specific price for a contract based on their circumstances or current consumption – not just a tariff rate from which they felt would be difficult to calculate a monthly or quarterly cost. Some were also concerned about the amount of effort that would be required to generate and keep the list updated, and whether this would be funded by customers. Furthermore, those calling for independence among PCTs were unsure of the benefit of a separate independent list if PCTs were unable to establish relationships with individual suppliers for commission.

“I expect it to be filtered, there’s no point in having list of everyone when you have specific requirements.”

“Isn’t it going to be quite costly if they are going to have to carry out all these checks this independent company, and then the company is going to have to pay for it and ultimately we are going to have to...”

Panellists were least interested in knowing the percentage of suppliers covered in a PCTs search results, they felt that this would add a layer of confusion. Panellists were unsure how to assess a percentage figure and compare it with another PCT. For example, they felt that a comparison of 80% vs. 70% of all suppliers does not necessarily indicate that the former is the better PCT to use if the missing suppliers are some of the most well-known. Many were also concerned that highlighting missing suppliers would give consumers less confidence in making a decision and act as a barrier to switching.

“it (the percentage of suppliers covered) is yet another thing that makes it less likely that you’ll bother having to do it....yet another choice, yet another thing to think about, yet another thing to look at.”

Panellists suggested that a better solution could be for PCTs to clearly state which suppliers were covered and which were missing from their results. This was perceived to be clearer and easier to understand, and was seen as particularly helpful among those who were likely to enter into a contract with one of the major suppliers. This was less favourable to those whose choices of supplier were driven by price. However, given that most Panellists expected that they would need to consult multiple PCTs to establish which deals were the best for them; this option was still seen as helpful. Others felt that it would make little difference in practice as they would still be attracted by any offer that was considerably cheaper than their current contract, regardless of a clear statement indicating that the results represented only a portion of all the suppliers in the market.

“If they named the companies that weren’t on the PCT, that would be helpful. It goes along with transparency”

5 Conclusions

Though few had used PCTs for energy, Panellists were broadly supportive of the concept of the Confidence Code and the importance of ensuring that consumers get a good service from PCTs. Preferences for the principles PCTs should operate within were drawn heavily on experiences and assumptions from outside the energy market. These included assumptions that not all suppliers feature on every PCT and a desire to search for a **better** rather than the **best** deal. Most were sceptical of the information presented on PCTs. They felt that better deals were available by contacting suppliers directly, and that the information provided by PCTs could be improved, through accurate reflection of the best prices offered by suppliers, and providing clarity of finer details such as length of contract and cancellation fees.

Panellists therefore prioritised principles that empowered consumers to make informed choices. As such, they felt it was crucial to make sure that the information presented was clear, accurate, up to date, and impartial. Less emphasis was placed on the need for transparency and the need to show the whole market before filtering of results. This did not mean that they were not important, but rather that Panellists would prefer the opportunity to:

- i) choose whether they see the whole of market or a reduced list of suppliers based on their selection criteria;
- ii) receive impartial information rather than deals driven by commissioning arrangements.

Auditing was seen as crucial to ensuring PCTs met the principles that Panellists felt were most important – namely the presentation of clear, accurate, up to date and impartial information. Although there were no strong views to the frequency or depth of auditing, there was broad consensus among Panellists that consumers should not pay for the audit process. This would likely be a barrier to using PCTs.

Where commissioning relationships between suppliers and PCTs were in place, Panellists favoured greater transparency. However, although the concepts of having independent assessments of PCTs or an independent list of all tariffs were well received, Panellists were concerned that these could add confusion and create a further step and layer of information that they would need to consult before switching. Panellists were most supportive of information that was displayed whilst using the PCT over information that was held elsewhere (such as through an independent list of suppliers and tariffs). This information should be easy to evaluate, such as stating which suppliers are/are not covered by the tool.