

Closing the protection gap

Problems in the microbusiness energy market and how to fix them



Contents

3	Summary
4	What is a microbusiness?
5	Microbusinesses and the energy market
6	Key areas of detriment
7	Debt and disconnection
9	Vulnerability in the non-domestic sector
10	Consumer protection
11	Regulation of microbusiness supply contracts
12	Third Party Intermediaries (TPIs)
15	The future of TPIs and potential remedies
17	Supplier failures
19	Policy recommendations



Summary

The non-domestic energy market is not working well enough for the smallest businesses. Citizens Advice provides advice and support to thousands of microbusinesses each year. In particular the people contacting us face:

- Debt problems which can ultimately result in disconnection from their energy supply.
- Contract issues and problems caused by a minority of third party intermediaries - particularly brokers - using aggressive tactics to misrepresent and mis-sell¹.

These are areas where microbusiness consumers have relatively few protections.

We think it's time to start to close these gaps. The recommendations of this report seek to address these and other issues faced by microbusinesses.

Research method

We have developed our insight by drawing on a range of sources:

- The contacts we receive from consumers to our consumer service² and the Extra Help Unit³.
- Newly commissioned research on vulnerability and on the role of TPIs in the non-domestic energy market¹.
- Previous research commissioned by Citizens Advice and others, including Ofgem⁴.

Key recommendations



Industry should improve processes for microbusiness consumers around debt and disconnection



TPIs should be transparent on commission, market coverage, and any fees should appear on bills



Government should introduce appropriate regulation for brokers and other third party intermediaries



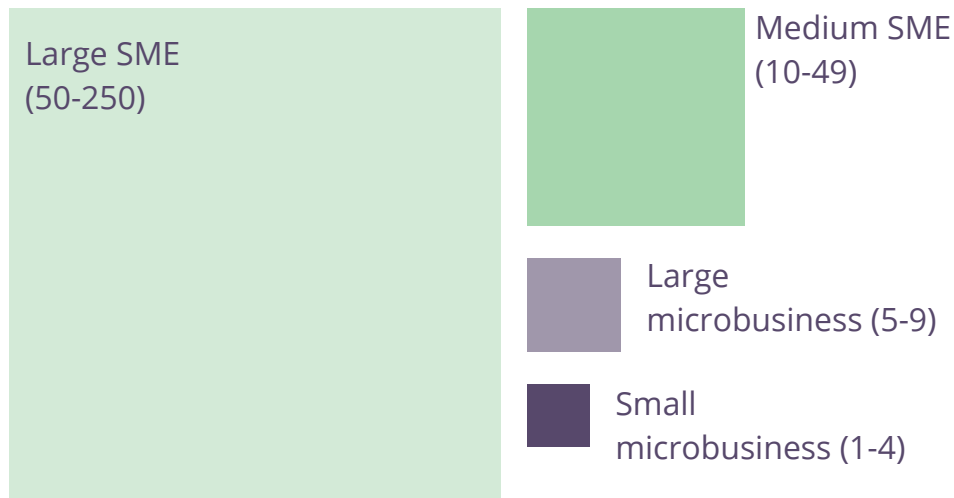
Ofgem should protect microbusinesses if their suppliers fail



Ofgem should evaluate the experience of vulnerable microbusiness consumers in the non-domestic sector

What is a microbusiness?

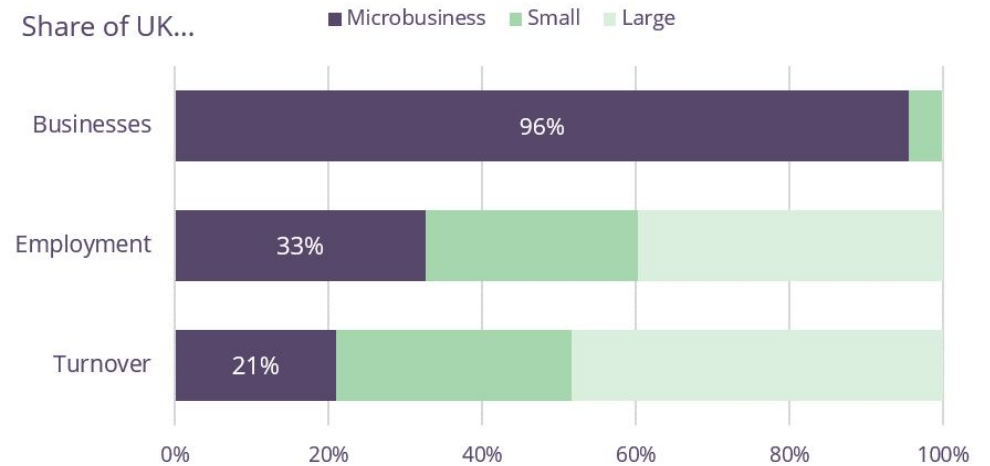
Microbusinesses generally have 1 to 10 employees, with larger microbusinesses having more than 5 employees.



A key component of this include the self-employed

- Around 1 in 6 employees (15%) in the UK are self-employed⁵.
- Almost half of UK businesses are single employee limited companies⁶.
- Sole proprietors now represent almost one fifth (17%) of total businesses⁶.

Most UK businesses are microbusinesses⁷



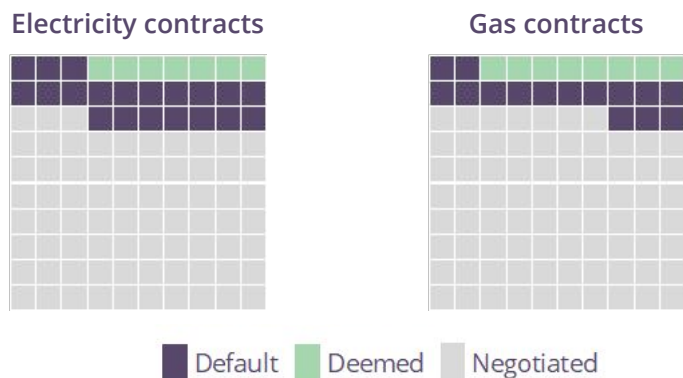
Ofgem protection

Microbusinesses have particular protections under the energy supply licence regime. They are defined as non-domestic sites which meet at least one of the following criteria⁸:

- Fewer than 10 employees (or their FTE) and an annual turnover or balance sheet no greater than €2 million.
- Using no more than 100,000kWh of electricity per year.
- Using no more than 293,000kWh of gas per year.

Microbusinesses and the energy market

Microbusiness engagement with the energy market⁹



The majority of microbusinesses are on negotiated contracts, most of which are multi-year. However, there are still a considerable number, (27% electricity, 23% gas), on default or deemed contracts.

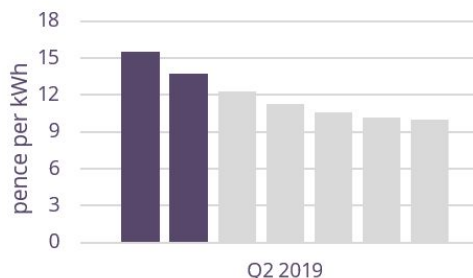
Unlike in the domestic market, suppliers do not face a 'duty to supply' microbusinesses. Suppliers may refuse to supply consumers that they see as 'risky', or likely to require a large security deposit¹⁰.

There are **1.3 million electricity** and **half a million gas** meter points on microbusiness contracts with the largest energy suppliers (who make up 90% of the market).¹¹

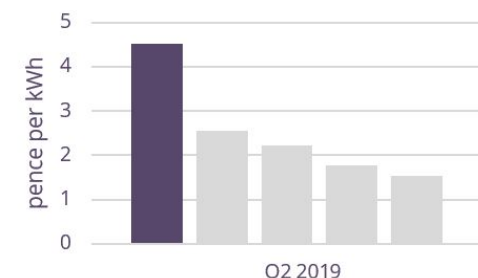
Microbusinesses make up a significant proportion of energy expenditure - **£3.5 billion in 2018¹¹**.

Microbusinesses pay more for their energy than larger businesses¹², (N.B - BEIS groupings differ from Ofgem's)

Cost of electricity based on usage



Cost of gas based on usage

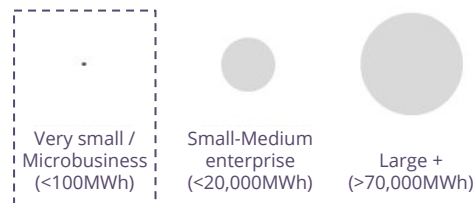


■ Very Small ■ Small ■ Small/Medium-Extra Large

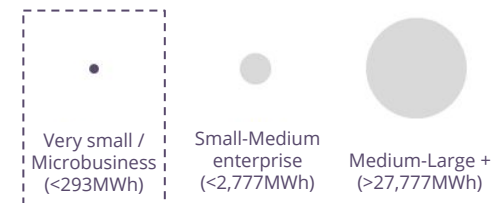
■ Very Small ■ Small-Very Large

Energy consumption varies widely in the non-domestic sector¹², (N.B - BEIS groupings differ from Ofgem's)

Electricity consumption by business size



Gas consumption by business size



Microbusinesses use relatively low amounts of energy in the non-domestic sector. Therefore, they are likely to engage with the energy market in very different ways to large users.

Key areas of detriment

Citizens Advice provides help to microbusiness energy consumers through our consumer advice services.

- Our **consumer service** gives first tier advice on consumer issues, with specific guidance on energy.
- The **Extra Help Unit (EHU)** is a specialist support service for vulnerable consumers and consumers in particularly difficult circumstances.

Both also provide support to domestic consumers.

The key issues we see through these services are:

Debt and disconnection

Contract issues / TPIs and brokers

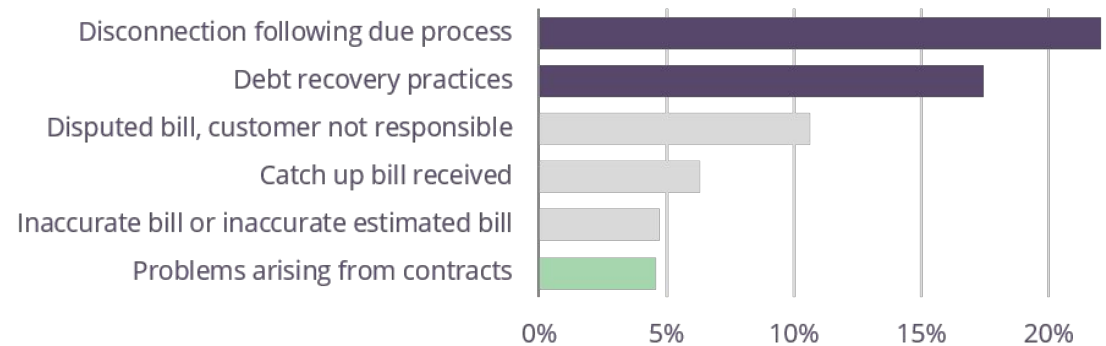
The most common microbusiness problems dealt with by the EHU relate to disconnection and debt recovery practices. Our consumer service also receives a high proportion of calls in these areas.

Issues with contracts are linked with TPIs and brokers, who negotiate most microbusiness contracts.

Billing issues are also frequent. However, this is a common problem across both domestic and non-domestic sectors.

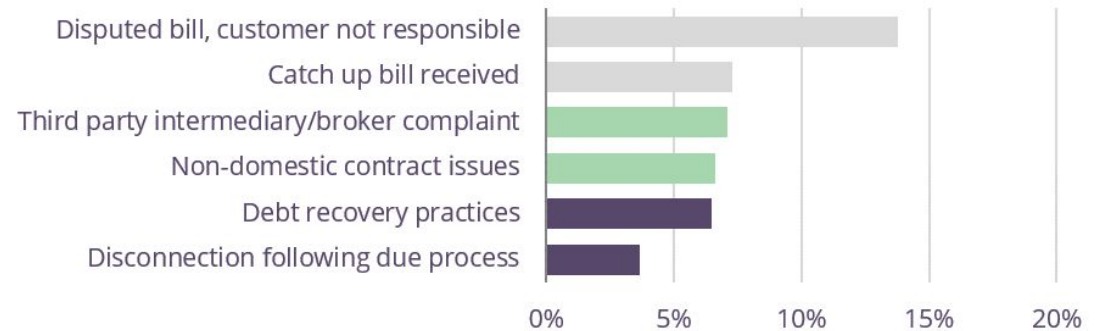
6 top issues for our Extra Help Unit

Out of a total of 46 issue categories



6 top issues for our consumer service

Out of a total of 81 issue categories



- EHU cases October 2018 - September 2019, based on total of 763 complaints
- consumer service cases October 2018 - September 2019, based on 2,717 complaints

Debt and Disconnection

During the period of June 2018 to May 2019, the consumer service received 189 unique cases where a debt amount was provided by the client.

During these contacts with the consumer service¹³ there was:

£ **An average debt of over £8,500**

£ **A total debt of over £1.5 million**


The people who contact us about debt would often have benefitted from engaging with us much sooner. Early interaction with our services means consumers have more options available to them.

Our supplier good practice guide for microbusiness energy debt¹⁴ recommends partnerships with advice organisations to help customers get timely support.

We also liaise with other consumer advisory services to understand the breadth of issues in the sector. One such group is Business Debtline, who provide free, impartial debt advice to small businesses. Information from a survey¹⁵ they conducted in 2018 showed:

£ **39% of surveyed Business Debtline clients have a gross annual income of £25,000 or lower¹⁵**



 **Almost half of surveyed Business Debtline clients receive payments late from their customers¹⁵**



Debt and Disconnection

Microbusinesses lack protections

Debt can occur if difficulties in the business mean consumers fall behind on bills. If energy suppliers make mistakes - like billing problems - these can also result in an energy debt.

Microbusinesses are protected from back bills of more than a year in most cases¹⁶. But this still means they can face catch-up bills of thousands of pounds even though they are not at fault.

In other areas, microbusinesses have relatively few protections. Domestic suppliers must go through a number of steps to avoid disconnection, such as offering affordable repayment plans¹⁷.

This is not the case in the non-domestic sector, so it is much easier to be disconnected. Although some suppliers work to resolve issues and avoid disconnection, others do not. Consumers can be hit with high disconnection and reconnection fees.

Some additional protection may soon exist for some of the smallest businesses. Government has proposed introducing new 'breathing space' protections from debt collection for sole traders with turnover of less than £85,000 a year¹⁸.

This would give them a period of 60 days to determine the best long term solution for their debts.

Case study: disconnection



The consumer lives in a property that is a pub with a family home above. She lives with her two young children and a spouse who is registered as disabled.

The consumer gave her notice to the brewery, who owned the pub, but continued to work and live in the property as there was no alternative accommodation they could move in to.

The consumer was threatened with disconnection as their account was in arrears.

The consumer did not dispute the debt but, given the circumstances, wanted the threat of disconnection to be removed.

The EHU helped the consumer get a better outcome from their supplier. Taking into account the on-site vulnerability, the energy supplier immediately stopped the disconnection action. The supplier's credit management team then set up a payment plan for the remaining balance.

Call to the EHU, January 2018

Vulnerability in the non-domestic sector

Mixed-use properties

The EHU case study demonstrates that people in their homes can be at risk when microbusinesses are disconnected for debt.

This issue arises because of how domestic and non-domestic premises are defined in Ofgem's licence conditions¹⁹:

Domestic

Premises that use energy primarily for domestic purposes (heating, cooking and running electrical appliances).

Non-Domestic

Any site that is not a Domestic Premises.

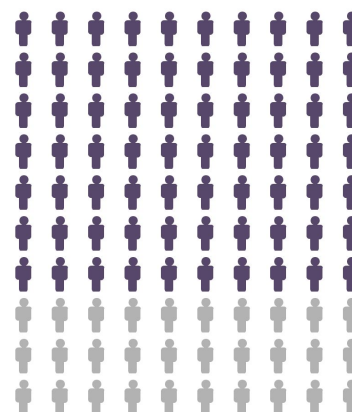
Most people who run a business from their home are likely to be on domestic contracts and receive the same protection as domestic consumers²⁰.

However, some small microbusinesses occupy buildings which are primarily non-domestic but have a domestic component - for example, a corner shop with somebody living above it.

We think that anyone who lives in a mixed-use premises should receive the same protection from disconnection, regardless of whether they are on a domestic or microbusiness contract. This could mean offering prepayment as an alternative payment method, and agreeing on fair repayment plans.

Vulnerability and microbusinesses

People who run small businesses can experience vulnerable circumstances²¹. Research has shown that people choose to be self-employed for a variety of reasons²², and for some it is a necessity¹⁵. This can be due to an array of circumstances including difficulty in finding work or family commitments.



69%

of Business Debtline clients considered themselves vulnerable, according to a survey¹⁵.

This could be due to finances, health, bereavement or other personal circumstances.

Some microbusiness consumers would get extra support if they were on a domestic supply contract. The sort of differences that exist are demonstrated in the examples on the next page.

Consumer protection

A domestic consumer can expect a minimum level of support from their supplier if they get into difficulty.

Jagmeet recently moved in to a new property and wants to keep the same supplier. He is a full-time carer for his disabled brother.

- Jagmeet does not receive any bills but doesn't remember what was agreed. He assumes he will receive a bill soon.

A debt builds up and the supplier eventually sends a bill for around £1,000, which Jagmeet cannot afford.

- The supplier talks to Jagmeet to understand his situation. An affordable payment plan is agreed over 2 years.



Non-domestic consumers are not afforded the same protections as domestic consumers.

Elizabeth is disabled and runs a small carpentry business. She negotiates an energy contract through a broker.

- Business is good but payments are often late. As a result, Elizabeth misses a few bills.

A debt builds up and the supplier threatens to disconnect unless the balance is paid.

- Elizabeth is disconnected. She offers to pay the balance, but can't afford the disconnection and reconnection fees. The supplier refuses to waive them.



Regulation of microbusiness supply contracts

Suppliers must treat both domestic and microbusinesses fairly under Ofgem’s Standards of Conduct²³. But for domestic supply there’s also narrow principles and more prescriptive rules.

	Domestic supply	Microbusiness supply
High-level principles	SLC 0 Standards of Conduct (including vulnerability principle)	SLC 0A Standards of Conduct
Narrow principles	SLCs 31F-31I Comms SLC 25 Informed choices	None
Prescriptive rules	SLCs 1-21D Contracts, SoLR, switching, billing SLCs 22-32A Domestic contracts, tariffs, priority services, price cap, prepayment, disconnection, engagement trials SLCs 33-58 FiTs, Green Deal, smart metering	SLCs 1-21D Contracts, SoLR, switching, billing SLCs 33-58 FiTs, Green Deal, smart metering
Other rules	Complaint Handling Standards, Health and Safety at Work Act 1974, Equality Act 2010	

Microbusinesses do not have specific regulatory protections in relation to the issues around debt, disconnection and vulnerability that we’ve outlined in this report.

Some protection could flow from the high-level requirement to treat customers fairly. For example, this principle covers a supplier’s discretion to waive fees, including reconnection or disconnection fees.

One way that suppliers and consumer advice organisations develop an understanding of how the rules should be implemented is through Ofgem’s compliance and enforcement work.

There have only been 3 formal investigations^{24,25,26} which considered the microbusiness Standards of Conduct. Of these, one was closed because the supplier failed and no findings were published. None of them looked at the tougher post-2017 Standards of Conduct rules.

Ofgem also shares outcomes from its compliance work. **Only 1 of Ofgem’s 3 compliance and enforcement reports included content related to microbusinesses.**

This limited activity makes it hard to determine how the principles-based rules should protect microbusiness consumers, and whether they’re sufficient.

Vulnerability in microbusinesses is a complex issue, but there may be areas where more protections are needed. We have called²⁷ for Ofgem to consider this as part of its strategic review of the microbusiness market¹¹.

Third party intermediaries (TPIs)

What are TPIs?

TPIs can include switching websites, energy brokers and consultants on energy efficiency advice²⁸. They offer businesses advice on services and products, including energy procurement, efficiency and management.

TPIs provide information on suppliers and tariffs. This often involves brokering specific or bespoke energy supply contracts. TPIs charge a commission for this service, collected from either the consumer or supplier. This is typically through either a flat fee or a charge per kWh of energy (for example 1p/kWh). This is added on to the bill from the supplier.

TPIs work with domestic and non-domestic consumers, and provide a valuable service to both. However, we see cases from a minority of brokers which act dishonestly and cause considerable consumer detriment.

Case study: misselling

The consumer claims they were mis-sold a contract via a third party. They were led to believe they would save £700 per year. The consumer is now paying more than they were with their previous supplier.

Call to EHU - June 2018

Microbusinesses and TPIs

Microbusinesses are often stretched and cannot devote much time to finding a good energy deal. This, along with the complexity of tariffs, means smaller businesses are less likely to switch than larger ones⁴.

Microbusinesses often turn to TPIs, such as brokers to help. TPIs negotiate around a third of contracts in the sector¹.

The majority of TPIs receive positive feedback from consumers, However, the calls our services receive show that consumers are at risk of exploitation through:

- ⊗ being pressured into agreeing contracts;
- ⊗ limited transparency about fees and who pays these;
- ⊗ misrepresentation of the broker's market coverage.

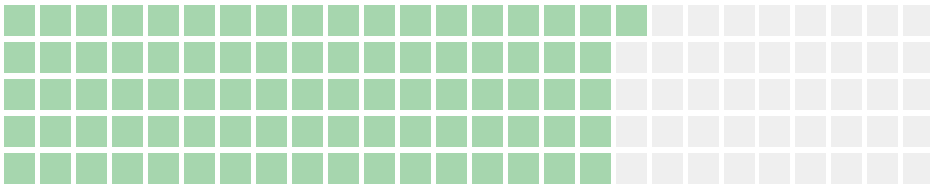
We need to help consumers avoid poorly performing TPIs. The approach taken must tackle the significant harm caused by this minority, while allowing the majority to continue to offer a good service.

Third party intermediaries (TPIs)

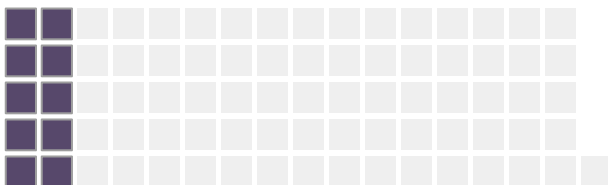
TPIs dominate consumer choices

TPIs, rather than suppliers, dominate consumer engagement and their access to suppliers during sales where they are used. Some suppliers obtain all of their customers via TPIs¹.

Out of 130 TPIs surveyed by Cornwall Insight, around 2/3 stated they work with only 10 suppliers or fewer¹.



This means those TPIs are allowing access to around 12% of the 86 suppliers in the market¹.



Concerns from suppliers

Research we commissioned from Cornwall Insight¹ found suppliers had several concerns about TPIs. 3 key concerns were:

1. The risk of TPIs not offering the most appropriate products to the consumer.
2. Whether TPIs added sufficient value to account for their fees.
3. The information consumers receive from TPIs regarding market access.

Case study: potential fraud from third party



The supply for the consumer's property was switched without their permission or consent. It's believed a rogue broker is responsible.

The EHU contacted the supplier who confirmed that the consumer's signature did not match that of the new contract. The supplier agreed to liaise with the third party broker and investigate this fraudulent contract.

Third party intermediaries (TPIs)

Communication barriers



TPIs can prevent suppliers and consumers from interacting during the contract negotiation phase. While this may help ensure suppliers take on certain consumers, it can also prevent suppliers understanding, in advance, any additional needs the consumer may have. The lack of prior communication can potentially make any later interactions more difficult¹⁴.

This can also be an issue when domestic customers use TPIs. However, for non-domestic suppliers there are fewer rules on customer communications. There is often less signposting to third party support, and communications on issues like debt can appear aggressive and prevent early engagement.

Limited use of digital comparison tools

Ofgem and the CMA have tried to take action to encourage use of price comparison websites (PCWs) / digital comparison tools amongst microbusiness consumers. However, these are still not commonly used by microbusinesses.

Ofgem and Citizens Advice's 2018 microbusiness engagement survey found²⁹:

-  Only 31% of microbusinesses stated they used PCWs.
-  Just 1 in 10 used them as a main source.

One advantage is that a consumer can avoid using a broker, which may carry higher costs. However, microbusinesses can find it difficult to understand the options available, especially as the non-domestic market is often complex³⁰. Furthermore, barriers exist, such as requiring a credit score to provide an estimated cost.

Microbusiness consumers want to be confident they're making the right decisions for their business. Therefore, many do prefer to speak directly to a TPI/broker at some stage during the process of engaging with the energy market.

Lack of awareness

Greater awareness of the energy market, the performance of brokers and the specific services offered, would help businesses avoid these circumstances. Yet, this is difficult to achieve as energy is a relatively low priority and takes time to understand. Ironically, these are the very same reasons that may cause businesses to use a TPI in the first place²⁹.

Some microbusinesses can end up on long and costly contracts without realising. The higher costs can lead to energy debt. Many are unaware that greater effort in the early stages of contract negotiation could have avoided this.

The future of TPIs and potential remedies

Greater transparency

Price transparency is a key factor in ensuring that consumers can confidently navigate the energy market. In research we commissioned from Cornwall Insight, most suppliers interviewed thought the consumer should know what they're paying for, but that any changes towards this would need to be implemented by numerous suppliers across the market¹.

One supplier stated:

"If the customer knows what they are getting, then why would a TPI mind having it on the customer's bill? We don't have a problem in having our margin on the bill."

However, another supplier said:

"If the supplier became more transparent on their own, it would destroy the relationship not just with that broker but with all brokers. It all depends on how a change like that is implemented and what the driving force is."

In 2018, lower pricing was the most cited reason for businesses switching suppliers²⁹. It could be useful to do more to help consumers understand if they're getting a good deal and how their total cost is made up, including broker fees. Currently, **it can be difficult for consumers to assess the performance of these services.**

Transparency from both TPIs and suppliers may go some way to solving this.

The CMA Price Transparency Remedy³⁰ required suppliers to make price information more available to microbusinesses in order to help them make informed choices.

This was intended to reduce search costs and encourage more switching. However, analysis by Ofgem shows that this has not been as effective as hoped³¹. The possible reasons for this are varied and include:

- Price complexity across many tariff options.
- Limited awareness from microbusinesses of the tools available to them.
- The need for bespoke contracts for businesses.

The future of TPIs and potential remedies

A TPI code of practice

Some suppliers already require TPIs to follow a code of practice to work with them³², and ElectraLink are launching an independent, voluntary TPI code³³.

Voluntary schemes can help reduce the risk of detriment and improve consumer confidence in the sector. But in our experience, they are not a long-term solution. They tend to cover better performing companies rather than those causing the most detriment, leaving those consumers unprotected.

That said, a code could be a good first step in transitioning to more formal regulation and be used to test potential remedies.

We expect any code of practice to adopt principles we previously developed with Ofgem³⁴:

- **Honesty** Being clear about what agreements the broker has with suppliers.
- **Respect** If the consumer isn't interested, the broker stops contacting them.
- **Accuracy** The number of suppliers compared is clear and the tariffs are presented clearly.
- **Transparency** Around terms, costs and commissions.
- **Customer-focused** Complaints are handled properly.
- **Professional** Staff are trained and follow the principles.

Regulating for a future market

Ofgem has some existing powers in relation to microbusiness TPIs. Under Business Protection from Misleading Marketing Regulations (BPMMR), Ofgem can seek actions from brokers and other organisations to stop misleading marketing activity, or apply to court for an injunction to ensure that they are complying with the legislation. Ofgem cannot fine brokers^{35,36}.

As far as we know, the regulator has never formally used these powers, and Ofgem themselves have called for strengthening of these powers to help tackle misconduct³⁷.

The consumer risks from TPI activities will increase as the services they offer become more complex and data driven. This could include activities like auto-switching customers or taking decisions around operating appliances in response to price signals. Protection is needed to ensure the market works for everyone.

In our recent report, Future for All³⁸, we called for TPIs to be brought into the scope of sectoral regulation for and that consumers should receive the same level of protection regardless of how they engage with the market.

Supplier failures

Market instability

An emerging area of harm for microbusinesses is their lack of protection when energy suppliers fail. **In the past 20 months, 16 suppliers have gone bankrupt.** Of these, three supplied microbusinesses, and two served only non-domestic customers.

When a supplier fails, Ofgem's Supplier of Last Resort (SoLR) process finds a new supplier to prevent disruption in energy supply³⁹.

Domestic customers' credit balances are protected by the new supplier. This protection does not extend to microbusinesses, although it has been applied voluntarily in some cases.

Recent failures affecting non-domestic consumers

- **October 2019 - Rutherford trading as Uttily** 280 non-domestic customers with 18,000 accounts.
- **September 2019 - Eversmart** 10 non-domestic customers, voluntary credit protection agreed.
- **August 2019 - Solarplicity** 500 non-domestic customers affected, no credit protection in place.
- **November 2018 - Extra Energy** 21,000 non-domestic customers affected, voluntary credit protection agreed.

Consumer impact

A relatively small number of microbusiness customers have been affected to date, but the impact can be severe.

Supplier failures can leave microbusinesses thousands of pounds out of pocket. Their only option is to join the queue of non-priority creditors waiting for their money back from the administrator of the failed supplier. This process can take upwards of 12 months.

On average, 10p for every £1 is returned to non-priority creditors, such as microbusinesses.

Case study: account issues with SoLR



A SoLR supplier claimed a debt had accrued on a new customer's account after they took over the supply. The consumer claims the meter in question was for another company in the same building.

The supplier continued to pursue the £4,000 of debt and planned to take disconnection action if this was not paid in full. The consumer chose to raise the case with the Ombudsman.

Call to EHU - July 2019

Supplier failures

No easy way out for microbusinesses

Before suppliers fail there are often rumours about their financial situation in the press and on social media. The lack of credit balance protection can leave microbusiness in a tricky situation if they become aware their supplier is in financial trouble.

Around a quarter of microbusinesses are on default (or similar) contracts, which they should be able to leave without incurring a large penalty. This might be the safest option to retrieve their credit balance and any security deposit. However, if lots of consumers take this action, it could make it more likely that the supplier fails, where they might not otherwise have done so.

But three quarters of microbusinesses are on contracts - many of them for long periods - which they cannot easily leave. They could ask for a credit refund if a large balance has built up, but they don't have any right to one. And if they have a security deposit they have no easy way of getting this returned.

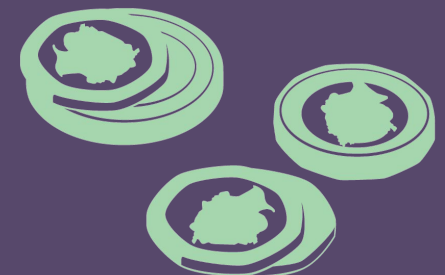
Supplier licensing review

We think the lack of protection leaves microbusiness consumers at significant risk, and could make it more likely that they avoid smaller and newer suppliers for fear they could lose their money.

We've called for Ofgem's supplier licensing review to consider introducing a microbusiness safety net to protect these customers credit balances⁴⁰. This protection should be paid for by other non-domestic consumers, rather than domestic consumers.

Ofgem should also:

- take action to reduce the size of credit balances, so that less money is put at risk if a supplier fails, and;
- extend requirements for suppliers to refund domestic customers on request (unless it is fair and reasonable not to) to microbusiness customers.



Policy recommendations

1

Industry should improve processes for microbusiness consumers around debt and disconnection

Debt recovery practices and disconnection are the two most common issues raised by microbusinesses with the Extra Help Unit. The level of detriment we see regarding these issues concerns us. Poorly handled energy debt can contribute to the failure of businesses and take a severe personal toll on affected consumers.

Government is already proposing to introduce new 'breathing space' rules for sole traders¹⁸. Industry should go further and consider how to improve its debt practices for all microbusiness consumers as part of its requirement to treat customers fairly. This could include improved customer communications and referrals to third party support, such as Citizens Advice and Business Debtline, at an earlier stage in the debt process.

2

TPIs should be transparent on commission, market coverage, and any fees should appear on bills

The CMA Energy Market Investigation agreed that suppliers should be more transparent about their prices³⁰, and Ofgem implemented its proposed remedies in 2017.

However, the need for transparency should apply to all organisations involved in the customer journey.

During the sales process, TPIs should present information about market coverage, disclose their commission arrangements and the nature of their relationships with suppliers. Any ongoing commission could also be included as a separate line item on bills.

This could help microbusinesses make informed choices between TPIs, and between suppliers or tariffs.

Policy recommendations

3

Government should introduce appropriate regulation for brokers and other third party intermediaries

Although many brokers help microbusinesses get a good deal, some are not treating them fairly.

Voluntary codes of practice exist³², but they still allow a minority of TPIs to cause detriment to consumers. And Ofgem's existing powers do not offer consumers enough protection³⁷.

A more effective step further would be appropriate regulation, based on high-level, principles based rules. An authorisation regime was previously suggested by the CMA as the most effective approach to regulating digital comparison tools. This is already used by the Financial Conduct Authority.

4

Ofgem should protect microbusinesses if their suppliers fail

Microbusinesses currently have no formal protection of their credit balances or security deposits if their supplier fails. Companies have little scope to protect themselves by switching supplier or asking for a credit refund. This can lead to microbusinesses losing thousands of pounds through no fault of their own.

Ofgem should establish a protection scheme for microbusiness customer credit balances and security deposits.

Ofgem should also act to prevent excessive high credit balances and extend domestic protections that require credit balance refunds on request to microbusinesses.

Policy recommendations

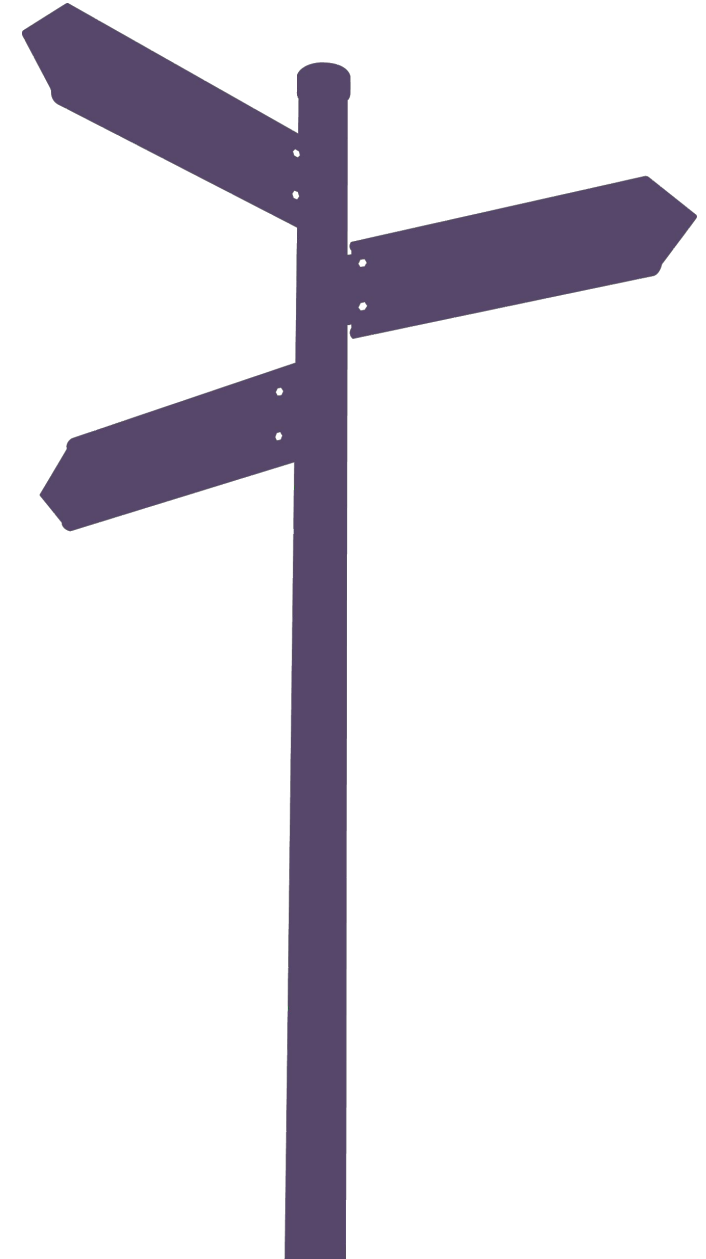
5

Ofgem should evaluate the experience of vulnerable microbusiness consumers in the non-domestic sector

It's unclear to what extent consumers in vulnerable circumstances are protected by the microbusiness Standards of Conduct, particularly in relation to debt and disconnection.

Ofgem should use its strategic review to evaluate how suppliers have implemented the Standards of Conduct for their microbusiness customers to ensure suppliers are treating them fairly.

Ofgem should appropriately prioritise compliance and enforcement work in this area, and ensure they share findings with industry.



Footnotes

1. Cornwall Insight and Citizens Advice, [The Role of Third Party Intermediaries \(TPIs\) in the GB SME and Microbusiness Energy Supply Sector](#) (2019)
2. The Citizens Advice consumer service provides practical and impartial advice to consumers. They can provide information on the law which applies to a specific situation and pass on information about complaints to Trading Standards, where required.
3. The Extra Help Unit is a specialist team of caseworkers investigating energy and post complaints on behalf of vulnerable consumers. The service is telephone based and covers the whole of Great Britain, helping domestic and micro-business consumers. The Extra Help Unit is not a public helpline. Consumers are referred to the Unit by the Citizens Advice consumer service.
4. Ofgem, [Micro and small business customer engagement in the energy market, 2016](#) (2017)
5. CIPD, [Mega Trends A picture of self-employment in the UK](#) (2018)
6. ONS, [Statistical bulletin: UK business activity, size and location 2018 – UK businesses broken down by legal status, industry, region, employment and turnover size bands](#) (2018)
7. House of Commons Library, [Briefing Paper Number 06152, Business statistics](#) (2018)
8. Ofgem, [Micro business consumer](#) (2019)
9. Ofgem, [State of the Energy Market 2019](#) (2019)
10. Ofgem, [Report to Steering Group - Duty to Supply](#) (2006)
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12. BEIS, [Gas and electricity prices in the non-domestic sector](#) (2019)
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Published October 2019

Citizens Advice is the operating name of The National Association of Citizens Advice Bureaux. Registered charity number 279057.