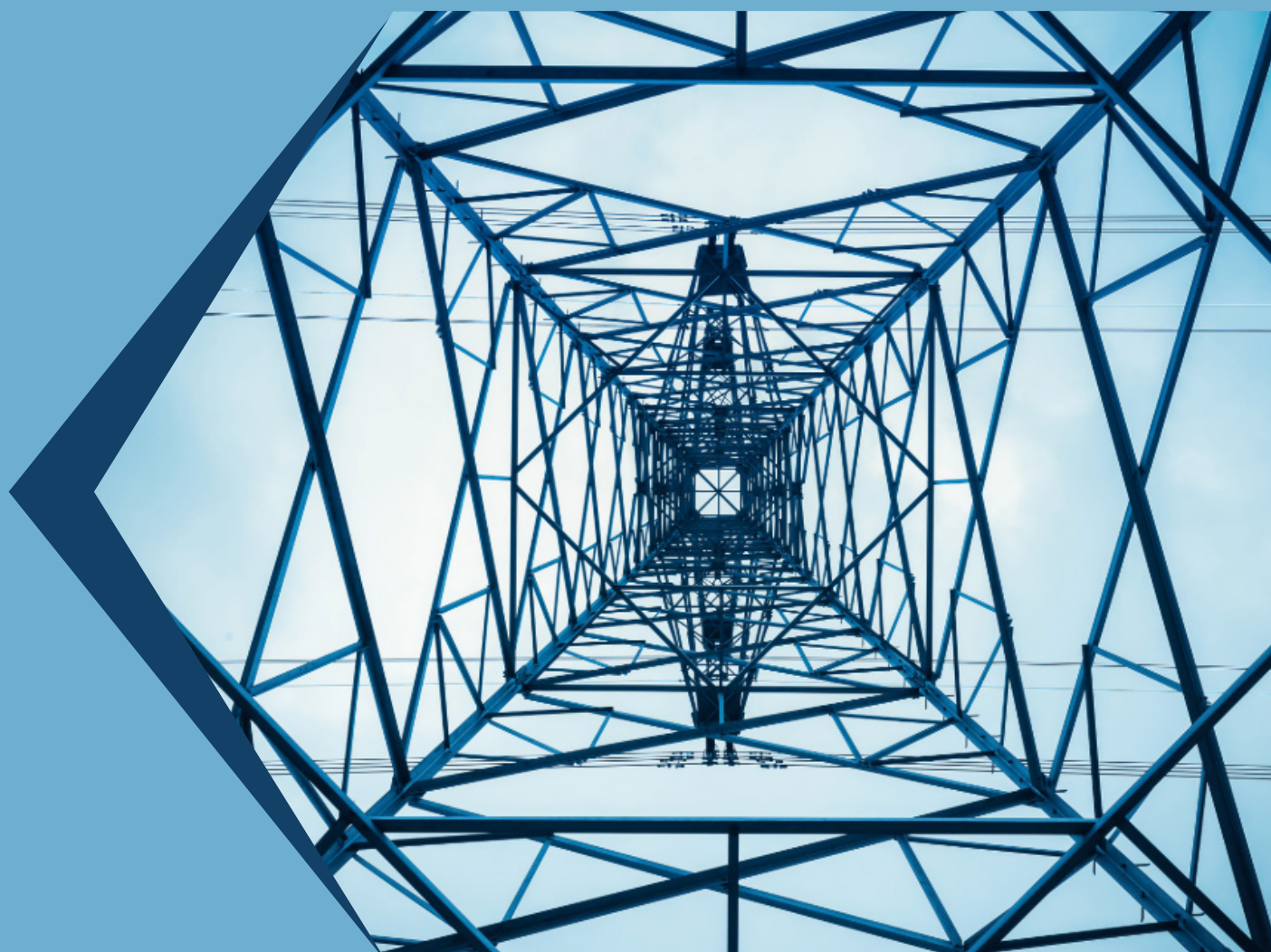


ENERGY BROKERS:

INTERMEDIARIES IN A CHANGING
ENERGY LANDSCAPE



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Executive Summary

Manufacturers face an increasingly challenging environment for doing business. Surging operational costs are driven by direct factors such as material costs but ever-increasingly indirect costs such as energy. The Industrial Strategy has set the stage for the UK to become a “clean energy superpower”, establishing the foundations for financing a renewables-led transformation of the energy market.

For energy-intensive businesses like manufacturers, pursuing opportunities to reduce utility costs is mission-critical. However, the energy market is an intricate and instantaneous space to navigate – events on the other side of the world can have an immediate impact on prices of electricity and gas here in the UK.

Therefore, Third-Party Intermediaries (TPIs), like energy brokers, can act as an invaluable conduit between energy suppliers and the end consumer. Acting as an intermediary in a technical and complex field like energy is a trusted position – which means a consultant should provide its services with skill and care.

However, some allegedly bad actors within the sector fall short of this standard. Non-domestic energy users have come across underhand techniques, transparency issues,

mis-selling, dispute resolution matters and poor customer service – exacerbating issues around high energy costs and creating further uncertainty within the market.

On 23 October 2025, the Department for Energy Security and Net Zero announced the government's intention to appoint Ofgem as the regulator for TPIs in the retail energy market. A turning point in the previously unregulated energy consultancy landscape, this announcement highlights the impacts of egregious practices and effectual expert energy partnerships alike.

Although the practicalities around the future regulatory regimen are yet to be outlined, businesses can continue to make informed energy decisions – which begins long before sourcing external support.

ENERGY PROCUREMENT

Towards the end of 2022, a surge in energy prices saw energy costs fast become the number one issue for UK manufacturers. This increased the usage of third party intermediaries such as energy brokers as manufacturers sought to develop their procurement strategies to bring down costs.¹

As energy costs have become a critical concern for businesses, many organisations seek assistance from intermediaries. This route allows businesses, particularly SMEs, who may lack energy market expertise or internal resource, to secure the most opportune market contracts on offer. Many intermediaries offer a fully-managed service, where multiple supplier access, negotiations and market management all happen without customer input required.

Therefore, the role of a third-party intermediary is to ensure securing the best possible rates and help clients navigate a complex energy market, thus finding ways to optimise their energy procurement contracts around their usage.

¹ Non-domestic Research Report - 2024

What makes up an energy bill?

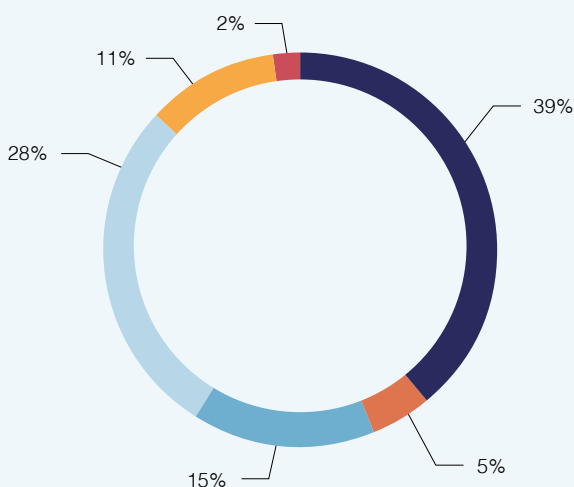
Energy bills are multifaceted, influenced by complex industry information and numerous government policies. As the UK are a net importer of energy, it can make our market more volatile than other countries.

SOME OF THE KEY DRIVERS OF UK ENERGY PRICE INCLUDE:

- Geopolitics.
- Weather – has a significant impact on our renewable generation but also plays a huge part in demand e.g gas for heating in winter, electricity for cooling in summer.
- Supply and demand.
- Gas storage levels – our security buffer when supply from continent or via liquefied natural gas (LNG) is low.
- Outages – power generation assets having planned or unplanned maintenance.
- Renewable generation – likelihood or effectiveness of generation of clean electricity on any given day.
- Currency exchange rates.

Chart 1: Commodity & non-commodity electricity charges 2025

■ Wholesale cost ■ Transmission charges ■ Distribution charges
■ Environmental levies ■ System charges ■ Supplier charge



Source: Inspired

Your business energy bills are made up of two main elements:

- **The commodity cost.** This is the wholesale cost of the electricity and gas you use – set by market conditions on the day they are bought.
- **Non-commodity costs**, also known as third party or non-energy costs. Examples of non-commodity costs include Transmission Network Use of System (TNUoS) charges, Distribution Use of System (DUoS) charges and Climate Change Levy (CCL).

When discussing surging energy prices, the relationship between commodity and non-commodity costs must be examined.

The commodity cost has been defined by the coupling of gas and electricity prices, driven by the UK's marginal pricing system which sets market rates according to the most expensive generator to come online. This marginal pricing system ensures the most economical generation set is always used, which is the standard approach in Europe and many other countries.

This means UK electricity prices have reflected the strong rise in gas prices since 2021 – influenced by factors such as the pandemic and the Ukraine war. This has been exacerbated by the UK's relative dependence on gas as opposed to other energy sources such as nuclear, coal and renewables.²

Moreover, the UK places most of its electricity policy levies – taxes – directly onto electricity bills. This has increased non-commodity costs, which can now make up around 60% of a business energy bill.³

For example, government schemes that support energy intensive businesses with their energy costs are funded with these taxes – collected from electricity suppliers and in turn reflected as a non-commodity cost in electricity bills of other businesses.

These costs are set to rise shortly as new transmission investment and nuclear power hit bills which could see energy bills rise by £300,000 for large energy users next April.⁴

Make UK has previously argued against the regressive nature of added costs, pushing the government to ensure the costs of policy schemes are not borne by manufacturers (e.g. via gas bills).⁵ Instead, these costs should be paid for in a progressive way which aligns with growth and decarbonisation objectives. The Government has stated its intention to consult on a British Industry Competitiveness Scheme (BICS) to address the impacts of these policy costs and drive down costs for manufacturers. Make UK has proposed a way for Government to implement this in 2026 including all manufacturers and believe it is an important step in addressing industry concerns.⁶

COMMODITY COSTS: WHOLESALE COSTS

Electricity and natural gas can be bought and sold in large volumes from the wholesale market. Generators and producers supply electricity or gas to the market and sell these for suppliers or retailers to supply to end users.

However, there are other market participants who neither generate or sell energy to end-users. These participants, often investment funds, trade energy for their financial gain and ultimately help with market liquidity.

On the flip side, speculative positions held by investment funds have been increasingly tied to heightened volatility during periods of geopolitical risk, with buying surging off the back of events like the end of the Ukraine transit agreement and US involvement against Iran.

For manufacturers, the wholesale market - and subsequently the determined market price - plays a large role in defining what the business ends up paying for their energy. The wholesale market is complex, hence why end-consumers almost universally do not engage with it directly. Instead, a supplier or route to market provider (trading house) is used.

Nevertheless, there are two main mechanisms for stakeholders to engage within these markets: **standardised bilateral contracts - and exchanges.**

Historically energy has been traded more commonly through a broker where prices are agreed bilaterally. Future exchanges have been used increasingly more recently, especially for intraday/ next-day power trading, as these provide much greater transparency, credit protection and liquidity. Future exchanges are legally binding agreements to buy or sell a specific quantity of a commodity (such as electricity) at a predetermined price on a specified future date.

Wholesale market prices are incredibly variable. Seasonal demand, changing weather and generation capacity availability all have a role in determining wholesale market price setting. Most customers will be familiar with this phenomenon when the price of domestic gas increases in winter as heating demand with domestic properties increases in line with reducing seasonal temperatures.

This price change is an example of the interplay between supply and demand on the wholesale market. Inversely, in summer months, higher levels of solar generation and low heating demand can put downward pressure on electricity prices.

²The impact of higher energy costs on UK businesses - Office for National Statistics

³Breaking down your business energy bill - Inspired

⁴Cornwall Insight analysis

⁵Tackling Electricity Prices For Manufacturers | Make UK

⁶Industry can't wait any longer for a fix to its energy crisis. Ministers should get a move on | Nils Pratley | The Guardian

RETAIL AND WHOLESALE MARKETS: WHAT IS THE DIFFERENCE?

Your commodity costs – the prices of gas and electricity – are also influenced by whether you are accessing the energy market from a retail or a wholesale setting.

At the retail market, suppliers sell electricity and gas directly to end consumers, while in the wholesale market suppliers and generators sell energy in bulk.

Due to this premise, retail prices are inclusive of costs like transmission charges, levies and supplier margins, while wholesale prices do not.

However, energy is one of the most volatile commodity markets in the world and this aspect is addressed differently in the two market settings. In the retail market, the supplier mitigates against unexpected price movements by adding, at times, considerable risk premiums to gas and electricity prices before selling to the end user. If the wholesale prices were to rise beyond what the supplier forecasted, they would then take the financial hit. Resultingly, these risk premiums increase substantially at times of high price volatility – in line with the risk suppliers are expected to take. Meanwhile in the wholesale market, the end user faces both the risks and the opportunities continuously changing gas and electricity prices offer.

Non-commodity costs

The practicalities around how non-commodity costs impact you depends on your contract arrangements, consumption and location. In principle however, charges levied to suppliers are reflected in the non-commodity element of your bill.

Government Levies:

- **Renewables Obligation (RO):** Renewable Obligation Certificates (ROCs) are tradable green certificates issued to UK renewable electricity generators to support the government's Renewables Obligation scheme. Electricity suppliers are required to present a certain number of ROCs to demonstrate towards their obligation to supply a proportion of electricity from renewable sources.
- **Contracts for Difference (CfD):** The CfD scheme is the government's main support mechanism for new low carbon electricity projects in Great Britain. Contracts for Difference are 15-year private law contracts between renewable electricity generators and the Low Carbon Contracts Company.
- **Feed-in Tariff (FIT):** This scheme requires participating suppliers to pay households and businesses for exporting surplus renewable power they have generated back to the grid. Although this scheme closed for applications in 2019, existing installations may still receive payments. The current scheme paying for electricity exported back to the grid is the Smart Export Guarantee.
- **EII Support Levy:** The support offered to energy intensive industries (EIIs) through the Network Charging Compensation scheme is funded by a levy on all licensed electricity suppliers in Great Britain, the EII Support Levy. In turn, this levy is transferred to non-domestic consumers as an extra charge on their electricity bills.
- **Green Gas Levy (GGL):** Applicable to licensed fossil fuel gas suppliers in Great Britain, this levy funds the Green Gas Support Scheme – which provides tariff support for biomethane produced via anaerobic digestion injected into the gas grid.
- **Capacity Market charge:** This is levied to electricity suppliers to fund the UK's Capacity Market. The levy has two main components: the Capacity Market Supplier Charge and the Settlement Costs Levy.
- **Nuclear Regulated Asset Base (RAB):** Designed to support the design, construction, commissioning and operation costs of new nuclear projects, all suppliers are required to fund the Nuclear RAB arrangements through the Supplier Obligation mechanism. The cost of this mechanism is reflected in the non-commodity element of consumer bills.

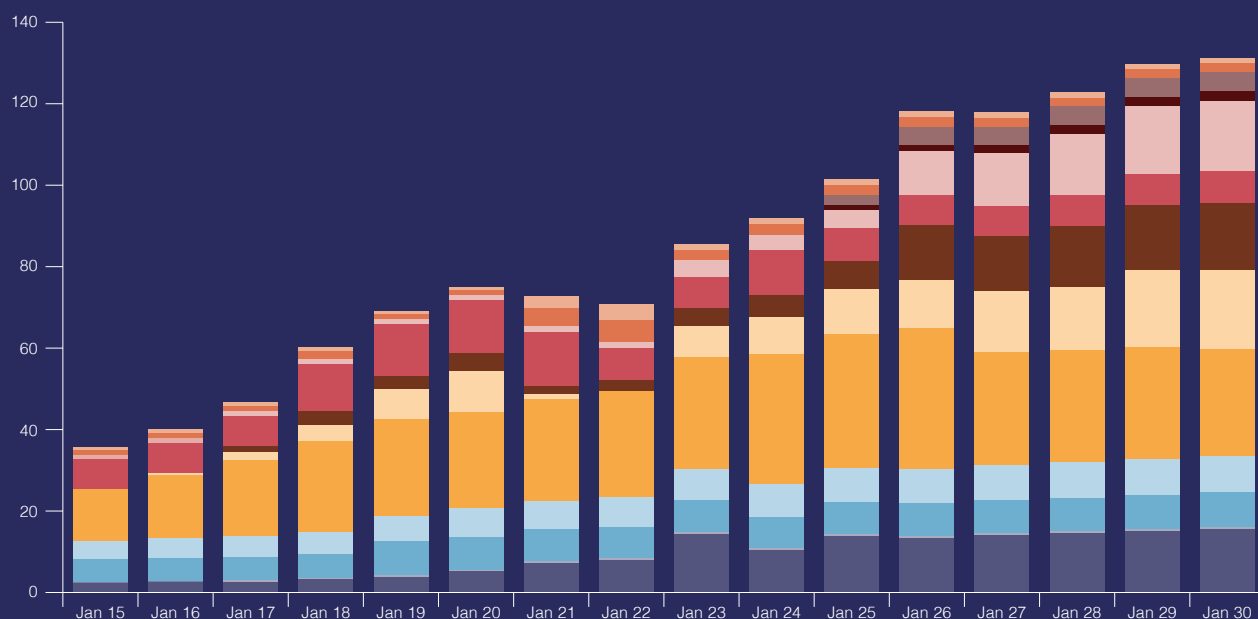
Systems Charges:

- Transmission Network Use of System (TNUoS): Charged from all suppliers and generators, this covers installations and maintenance in the transmission system.
- Distribution Use of System (DUoS): Businesses pay this cost to their supplier, which is then passed to Distribution System Operators towards maintenance of local electricity distribution networks.
- Balancing Services Use of System (BSUoS): This charge is paid to the National Grid to cover the cost of maintaining the entire network.

Chart 2: Non-commodity cost 5 year forecast

Cost (£/MWh)

■ Balancing Services Use of System ■ Areas for Assistance with High Electricity Distribution Costs ■ Climate Change Levy ■ Feed in Tariff ■ Renewables Obligation
 ■ Contracts for Difference ■ Capacity Mechanism ■ Distribution Use of System ■ Transmission Network Use of System ■ EII Support Levy ■ Nuclear RAB
 ■ Distribution Losses (Energy) ■ Transmission Losses (Energy)



Sources: Cornwall Insights, Suppliers, Network Operators, Distributors and other industry sources

Role of suppliers and Third-Party Intermediaries (TPIs)

Many consumers access the energy market by engaging directly with a licensed energy supplier. However, the energy market is a technical, complex and instantaneous space, especially for businesses which may lack internal resource or market knowledge to assess their options.

Third-Party Intermediaries (TPIs), such as energy consultants, help their clients to navigate this space – empowering them to buy energy with confidence. However, making informed energy buying decisions requires thoroughly evaluating the client's requirements and appetite for risk to deliver best suited procurement strategy.

Businesses typically have a range of energy suppliers to choose from, all competing with each other in a secondary retail market – separate to the wholesale energy market – by offering various contracts and incentives.⁷ This can be an intimidating and highly technical space, and using TPIs is therefore common – 81% of respondents to our survey stated they use TPI services.

This demonstrates how TPIs can play an important role in supporting manufacturers to make sense of an often challenging landscape. The TPI market has the potential to support consumers to secure bespoke and better-value energy contracts while demystifying the increasing variety of options for consumers in tariff types and additional services.

Without support from TPIs, manufacturers could be required to contact suppliers directly to request quotation for supply of electricity and or gas. Due to the complex nature already described of what makes up a delivered bill, many suppliers' quotations will include or exclude different aspects. This makes it increasingly complex then for the end user to compare and truly understand what they are reviewing, particularly if resources may already be constrained. From prior Make UK surveys completed, we also understand that many members are "going to market" when it suits their availability within their busy schedule - rather than because they have been tracking the market and believe, based on



81%
OF RESPONDENTS TO OUR SURVEY STATED
THEY USE TPI SERVICES

facts and various information sources, that now is the time to forward purchase their contracts.⁸

The price secured for the commodity element of an end user's bill is determined by timing in the market. This equates to 40% or more of the total cost of energy. If timing of renewal is more down to luck than insight, the end user is at the mercy of the market, rather than being able to influence the single biggest aspect of their overall bill.

TPIs that offer collective procurement, also known as baskets, provide value to individual businesses by aggregating their volume to be large enough to allow their energy to be traded in a manner that offers them access to more risk-managed strategies and the wholesale market. This in turn increases their cost transparency and helps further align their procurement strategy with their procurement goals.

Dealing with a supplier directly is often not a suitable solution for a manufacturing sector comprised mostly of SMEs: there is no capacity to hire a dedicated procurement team – therefore increasing reliance on TPIs.⁹

TPIs do charge for their services – regardless of what you may be told. They are a business and need to generate revenue from providing services. Some TPIs are very transparent and will communicate clearly what their fees are for delivering their services – prior to you engaging

^{7, 8, 9}Energy Procurement: The Cost of Complacency | Make UK

them. However, others who are less transparent may tell you that they take a “finders fee from the supplier”. This in fact, is incorrect. The reality is that you are paying for their services as a volumetric fee or commission which is added to the cost of energy you pay for. This is typically added as a p/kWh fee but we are aware some TPIs will also add commission to the fixed charges of your bill such as the standing charge.

One key thing to understand is that **not all fees are the same**. Volumetric fees are based on the consumption of the end user so the broker is then not incentivised to help the end user reduce their consumption, as it cannibalises their fees.

Also, when engaging with a broker who recovers their fees via the energy supplier, some suppliers will offer preferential payment terms to brokers over other suppliers. So the broker may be recommending a supplier because it means the broker will be paid a high proportion of their contracted

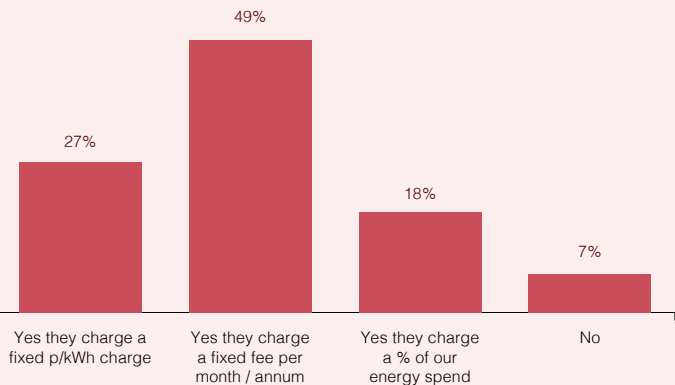
commission upfront - rather than it being drip fed over the contract duration.

Typically, brokers charging volumetric fees don't have agreements with the end user to deliver a set scope of works. So, the end user doesn't have any contractual service levels to measure the broker against. So the broker gets their fees, but with no obligation to provide any level of service other than placement of a supply contract.

By nature of this arrangement, brokers are incentivised to get end users to sign supply contracts when it suits the broker - not when the market conditions suit the end user. This drives the wrong behaviours amongst brokers.

The prevalence of TPI engagement showcases how manufacturers are utilising market expertise to improve their margins and find ways to become more competitive in a challenging business environment.

Chart 3: If you use a broker, is their remuneration method outlined within your contract?



Source: Make UK/ Inspired Energy Survey, 2025



Negative practices within the TPI market

Make UK research has indicated most manufacturers have not faced issues with their TPI – in this case an energy broker. However, a small percentage have faced challenges, including communication and billing issues. This reflects wider research from our Advantage Partner, Inspired.

Despite this, it is worth considering whether there is anything that could be driving the low levels of reported issues. The complex nature of the energy market suggests that manufacturers may be restricted in their ability to interrogate bills and understand if any fees are disproportionate. This is coupled with a lack of independent services to analyse bills and advise businesses.

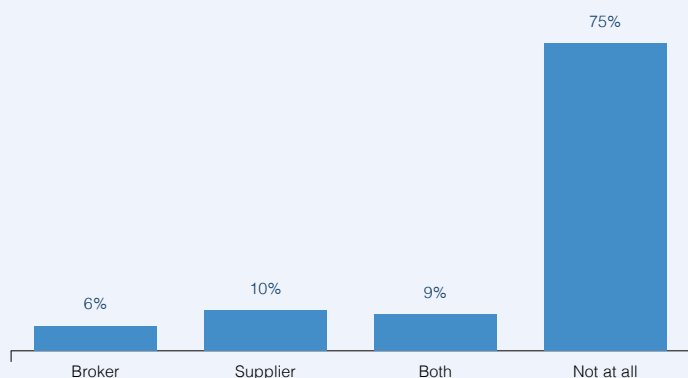
Bad actors and underhand tactics can materialise at any market. In the case of TPIs, these could include charging hidden fees and commissions.

Following a consultation on establishing a regulatory

scheme on TPIs, the government response document highlighted extreme behaviours in the non-domestic retail energy market, such as brokers misrepresenting themselves as energy suppliers and contributing to issues around changes of tenancy.¹⁰ The evidence submitted for this consultation suggests identified risks and consumer harms are concentrated in the non-domestic TPI market, specifically the subset of non-domestic TPIs serving SME and charitable customers.

As part of our research, we have collected a number of case studies to help better understand the approach and impact that underhand tactics can have to manufacturers.

Chart 4: Have you had any problems with either your broker or supplier? (pick one)



Source: Make UK/ Inspired Energy Survey, 2025

¹⁰Regulating third-party intermediaries (TPIs) in the retail energy market: government response (accessible webpage) - GOV.UK

CASE STUDY:

Pennine Healthcare Limited

Pennie Healthcare Ltd, incorporated in 1963, is a leading medical device manufacturer based in Derby who market and distribute products in over 50 countries worldwide, employing around 180 people. They have been impacted by a TPI providing rates unreflective of the market tying them into an expensive contract until 2029 when the market wasn't presenting good value.

An analysis of their contracts found that there was a significant difference between the market prices available on the day of the contract offers and the rates secured on the contracts. The below table shows the delta between the market price on the day of acceptance vs what their contracted rate:

Utility	Difference in cost between contract price and Market on day of contract acceptance	Annual cost difference
Electricity	15.5715 p/kWh	£292,276
Electricity	10.7593 p/kWh	£190.757

Utility	Difference in cost between contract price and Market on day of contract acceptance	Annual cost difference
Gas	8.985 p/kWh	£15,267
Gas	7.1444 p/kWh	£12,625

With further interrogation it was found that previous contracts had similar instances of inflated prices.

This is considered bad practice from the TPI that is arranging the contract especially as the contracts were offered so far in advance during a time that the market wasn't favourable to accept pricing 4 years before the supply period commenced. Within the difference in cost between contract price and market price was their hidden commission.

A TPI should be working in the clients best interest to recommend pro-activity when the market is presenting good value, but this was an occasion when the market was presenting bad value for pro-activity.

Our understanding of this agreement is that there was a hidden commission included within the contracts (prior to OFGEM forcing suppliers to disclose the TPI commission on the contract) and this may explain their encouragement to sign contracts so far in advance at uncompetitive prices.

CASE STUDY:

TEMCO Wire

TEMCO Wire, established in the UK since 1906 and based in Gloucestershire, is one of the world's leading specialists of highly advanced copper and alloy-based products. They have provided examples of poor experiences within the TPI market which has impacted their trust in using external advisers.

They have experienced underhand tactics being used by their broker through undisclosed terms within their Letter of Authority (LOA) which allowed contract termination and renewal without discussion with themselves. The TPI independently changed their terms extending their agreement for energy procurement to three years. The business has never signed more than a 12-month electricity procurement contract since the energy crisis due to an unpredictable energy market, uncertainty within the business environment and the fact that they are an intensive industry energy user. This has previously been managed through an open and transparent relationship with their TPI.

This expresses the impact of a lack of transparency within the market as the non-disclosure of the broker fees/ or agreements with energy providers within the contract meaning that there may be perverse incentives for brokers to change contract - such as better commission from the supplier - without considering the business environment of the company they are supporting.

Furthermore, TEMCO have found that their position as an energy intensive user has meant that they have received constant cold calling of brokers who are offering support on levies and navigation of various Government programmes. Whilst these offers may have genuine value, TEMCO are not in a position to take advantage of this due to their previous experience within the market and a lack of regulation to provide guarantees of quality.

Best practice guidance

Before engaging with a TPI or signing a supply contract, you should be comfortable with the information disclosed and fully understand the terms and conditions of the agreement you enter.

- **A commercially negotiated bilateral agreement** should include terms and clear costs that set out the obligations of each party.
- **A Letter of Authority (LoA)** type of contracting arrangement, where a consultant undertakes speculative work to secure prices for a client based on authorisation granted by a consumer. A LoA type of arrangement has the highest propensity for potential harm due to more ambiguous service expectations and lack of commercial terms.

Bilateral contracts govern the relationship between a client and the TPI and determine whether the client pays the TPI directly or nominates the agreed fee to be paid

by the supplier to the TPI – whereas the fee for the LoA is always paid by the supplier to the TPI.

Moreover, suppliers are mandated to confirm on supply contracts whether TPI has a commission included. However, this is not a matter of commissions alone. Some brokers can present misleading contracts, for example with pass-through rates only fixing the commodity cost but leaving the remainder exposed to market volatility.

Inspired has created a procurement checklist, which allows you to scrutinise future contracts renewals to ensure your chosen option aligns with your organisation's procurement goals. The checklist is available [here](#).



Policy environment

The regulatory environment has often led to a lack of oversight which has allowed rogue brokers to operate unchecked, charging hidden, inflated fees that add little or no value to customers.

The Government has heard this challenge and on 23 October 2025, they confirmed their intention to appoint Ofgem as the regulator for TPIs in the retail energy market. The initial scope of the regulatory regime will be defined by the activity being performed – energy procurement – rather than the business model or the organisation's structure.

After being appointed as the regulator, Ofgem is expected to implement a set of high-level principles for TPI behaviour and develop more specific rules, including a registration process to formally authorise TPIs to operate in the future market.

After the registration process has been developed and implemented, the government expects a 12–18-month sunrise period to allow all TPIs to register. After this, all TPIs without authorisation will have to cease energy procurement activity.

The appointment of a regulator marks a new era in a previously unregulated market landscape. Although further detail about the practicalities of the regulatory regimen are to be announced, direct regulation can be expected to mitigate undesirable behaviours.

However, the requirements of energy consumers are incredibly diverse – a domestic user has different service needs than a large industrial consumer. Therefore, an effective regulatory regimen must be founded in the requirements of different consumer segments, balanced with supplier obligations, and must acknowledge the role of contract law to be effective.

Before this announcement, prior attempts to set codes of conduct and operating parameters have lacked consequences, enforceability and universal supplier endorsement:

- **Utilities Intermediaries Association (UIA)** - The UIA Code of Practice and Broker Alternative Dispute Resolution (ADR) Scheme was established in 2006 as

a set of standards and a dispute resolution process for accredited members of the Utilities Intermediaries Association (UIA).

- **Retail Energy Code Company (RECCo)** - RECCo published its voluntary Third-Party Intermediary Code of Practice (TPI CoP) for non-domestic energy brokers and aggregators in October 2023. According to Ofgem, there were 44 TPIs signed up to the voluntary CoP as of 12 May 2025. On 21 May 2024, the RECCo raised the proposal R0137 to change their CoP from voluntary to mandatory. Ofgem rejected this proposal on 16 May 2025.
- **Energy Ombudsman** - Since December 2024, small businesses with up to 50 employees have been eligible to access Energy Ombudsman's independent dispute resolution services for disputes with energy brokers, providing:
 - o The business has fewer than 50 employees or their full-time equivalent, AND an annual turnover of at most £6.5 million or a balance sheet total of £5.0 million.
 - o OR an annual electricity consumption of not more than 200,000 kWh.
 - o OR an annual gas consumption of not more than 500,000 kWh.

Any well-structured bilateral contract should outline an alternative dispute resolution and mediation process. Make UK research has indicated only 17% of manufacturers have used the Energy Ombudsman or Ofgem to support their complaints about their broker or supplier.

With increasing evidence of unscrupulous actors within the energy market, this low percentage could indicate problems with available support to manufacturers, or accessibility of this support for time-poor SMEs – placing access and process simplification to the forefront.

Recommendations

When services are provided with skill and care, TPIs serve as an invaluable expert resource for end consumers to make informed energy decisions. Manufacturers should have the confidence to interact with the energy market to pursue best-priced contracts and bolster their operational resilience. Beyond this, a strong expert partnership can empower manufacturers to pursue their net zero goals.

Any reforms should support the government's broader ambition to create a more transparent, competitive and consumer-focused non-domestic energy market aligned with the UK's transition to a smart, flexible and decarbonised energy system.

We would also encourage all regulation to be cognisant of the needs of different sectors to ensure the best outcomes across businesses.

Therefore, our recommendations are as follows:

- **Launch a directory of approved brokers who commit to full disclosure and fair rates:** A common complaint of the TPI market is limited transparency, which creates mistrust and an ability for manufacturers to shop around effectively.¹¹ We propose Ofgem creates a directory of approved brokers who will have signed up to code of practice which commits them to full disclosure and fair market rates complimenting the existing registration process. This would be an effective way of strengthening visibility for manufacturers whilst minimising the necessity for costly regulation. The greater transparency that could be achieved through this method would allow manufacturers to feel more confident exploring different details and finding a suitable provider for their unique requirements. Moreover, utilising the role of Ofgem and agreeing to some clear principles would allow for greater enforcement if there is a failure to provide high quality standards.

There are examples of models like this being utilised in other regulated sectors. For instance, the FCA have a firm checker tool that allows consumers to check if financial services firms are authorised and have permission to sell you products and services.¹²

- **Stronger regulation:** Make UK is supportive of stronger regulation in the market but the Government must work with suppliers, TPIs, industry and consumers to understand the most effective way of funding this, avoiding increasing costs and to find the best way to support manufacturers without dampening the competitive benefits from the TPI market. We would recommend them to follow the principles outlined by the Plan for Small and Medium Businesses, continuing to aim to reduce the administrative costs of regulation for SMEs by 25%.¹³
- **Develop a new kitemark for and code of practice for ethical TPIs:** This is a common approach in different sectors through the British Standards Institute and there is already a good basis to build a code of practice with voluntary codes of conduct providing a route to mandatory regulation. By standardising and simplifying the actors' operating code of practices this would increase certainty and allow actors to engage with further confidence.

With Government proposing more specific rules, this may be an unnecessary addition to the sector but offers an alternative and potentially complimentary route to providing oversight.

¹¹Regulating third-party intermediaries (TPIs) in the retail energy market: government response (accessible webpage) - GOV.UK

¹²FCA Firm Checker | FCA

¹³Backing your business: our plan for small and medium sized businesses

INSPIRED

Viewpoint

Third-party intermediaries, like energy consultants, act as a valuable conduit between suppliers and clients. Should your business choose to source an external energy partner, their service should provide tangible benefits, such as cost, carbon or consumption savings.

Although direct regulation of TPIs is welcome, establishing an effective regimen in a previously unregulated market will be an extended process. Unfortunately, underhand practices can be expected to continue in the meantime.

Informed energy decision-making begins long before you source external support. Whether prospective or current, it's important to assess your consultant carefully.

For example, your energy consultant must understand the demands of your industry and surrounding regulatory landscape. Have they worked with manufacturers before? Can they present strong references within your sector?

Moreover, your consultant should take their time to understand your requirements – whether your goal is budget security, cost savings or supporting your wider

sustainability efforts with your energy procurement decisions.

As an established industry presence, Inspired has seen the impacts of pertinent and unfitting energy advice alike and continuously strives to raise standards in the energy consultancy space.

Make UK's energy and carbon partner of over 14 years, Inspired supports diverse manufacturing businesses, from SMEs and start-ups to some of the most energy-intensive businesses in the UK and Europe.

With a strong track record of supporting some of the UK's largest and most complex energy users, Inspired have been ranked the UK's number one industrial and commercial energy advisor since 2018 for a reason.



Dan Hulme, Head of Sales: Key Accounts, Inspired (Neil Mansfield Photography/ Make UK)

¹⁴Inspired remains number one in Cornwall Insight ranking

INSPIRED'S ENERGY AND CARBON HEALTHCHECK

INSPIRED

Inspired are offering MakeUK members a free of charge Energy and Carbon Health Check – so you can tackle the challenges we refer to as the 4Cs: Cost, Consumption, Carbon and Compliance.

Findings of your report could include:

- **Cost:** Can your cost p/kWh be improved? Are you eligible for any energy tax exemptions you are not currently claiming? What prices should you be expecting at your next energy contract renewal? Are there hidden broker fees within your current contracted rates?
- **Consumption:** Any areas where you could reduce consumption or avoid wasted consumption. What is the cost of this waste to your business and how could you become more efficient?
- **Carbon:** How is your business perceived through an ESG lens? What are your key competitors doing around ESG, sustainability or net zero and how do you fare or compare? What are your customers or markets going to expect of you?
- **Compliance:** Are you captured by any mandatory reporting and how could future changes to the regulation landscape impact your business?

WHAT DO WE NEED FROM YOU?

- One hour of your time – max. This is so we can learn more about your business, markets, customers, production methods, and any energy or carbon concerns you have.
- Some high-level data to complete the assessment.

WHY SHOULD YOU GET THE HEALTH CHECK?

- You have nothing to lose and money and carbon to save.
- There is no obligation for you to work with Inspired in the future – this service is a part of our commitment as a Make UK partner to support its members.
- It doesn't cost you anything!

Please email makeuk@inspiredenergy.co.uk about your Energy and Carbon Health check, and one of Inspired's experts will be in touch.



About



Make UK is backing manufacturing – helping our sector to engineer a digital, global and green future. From the First Industrial Revolution to the emergence of the Fourth, the manufacturing sector has been the UK's economic engine and the world's workshop. The 20,000 manufacturers we represent have created the new technologies of today and are designing the innovations of tomorrow. By investing in their people, they continue to compete on a global stage, providing the solutions to the world's biggest challenges. Together, manufacturing is changing, adapting and transforming to meet the future needs of the UK economy. A forward-thinking, bold and versatile sector, manufacturers are engineering their own future.

www.makeuk.org
@MakeUKCampaigns
#BackingManufacturing

For more information, please contact:

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INSPIRED

Inspired provides market-leading commercial energy and sustainability advisory services to help our clients achieve net-zero and thrive in the future low carbon global economy.

Every business faces a unique set of challenges and over 3,500 organisations have partnered with Inspired to find the best solutions for them.

We focus on helping our clients control costs, reduce energy consumption and carbon emissions and remain compliant in the regulatory landscape.

We have been recognised with the London Stock Exchange's Green Economy Mark since 2020 for our environmental and strategic advice and support to clients and have held our position in the Cornwall Insight ranking as the leading advisor for industrial and commercial consumers since 2018.

Our 700+ energy and sustainability experts form the backbone of our entire organisation, and it's their commitment and hard work that have led us to our success today.

We value our role in meeting the UK's climate targets, and we will be net-zero ourselves before 2050. The steps we've taken on our own decarbonisation journey mean we're ready to lead others towards adapting to a net-zero economy.

Today's partner for a better tomorrow.

inspiredplc.co.uk

