

Samantha Young
The Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

08 February 2024

Dear Samantha,

Consultation on the Consumer Protection Programme

NIE Networks welcomes the opportunity to comment on the Utility Regulators Consumer Protection Programme (CPP). Our comments are as follows.

We reaffirm our support and commitment to the UR's Consumer Protection Programme and to the protection of vulnerable consumers. We will continue to engage actively with the UR as it implements the CPP. We also recognise that customers need to be protected through the energy transition and welcome further engagement with the UR to take this policy development forward.

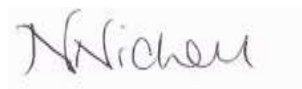
In terms of the UR's ongoing commitment to research and leadership, we consider that there would be value in looking into the opportunities provided in a greener economy for consumers and how those opportunities may help alleviate fuel poverty in Northern Ireland.

We welcome the UR's plans to consider the consumer impact of a Smart Metering implementation. NIE Networks, as the incumbent provider of metering services, would request that we are included in ongoing engagement with the UR/DfE and suppliers to ensure the high level design for smart metering will provide the desired benefits for consumers.

We have previously engaged with UR in relation to the Best Practice Framework (BPF) and Guaranteed and Overall Standards consultations, which again forms part of the overall delivery of the CPP. We support the ambition of developing a single register for utilities under the BPF, however would signal that this is complex in nature and will require significant resources from all utilities to deliver on this. In parallel with the development of a single register, we would suggest that other elements of the BPF can be delivered at an earlier stage and are willing to support in whatever capacity that is needed.

We agree with how the UR has considered ensuring equality in its plans. One area for potential consideration is whether geographically there are any barriers to a Just Transition. NIE Networks has experienced consumers not being able to connect to the network due to their rural setting and the inherent capacity of the network being lower. We have highlighted this through the UR and DfE's joint call for evidence into Connections Charging policy and may be worth considering from a consumer protection perspective.

Yours sincerely,



Natasha Nicholl
Customer Service Strategy Manager