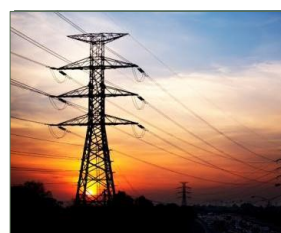


Consumer Protection Strategy Review and Proposed New Consumer Protection Programme commencing April 2019

Consultation Paper
October 2018



About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive leads a management team of directors representing each of the key functional areas in the organisation: Corporate Affairs; Electricity; Gas; Retail and Social; and Water. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.

Our Mission

Value and sustainability in energy and water.

Our Vision

We will make a difference for consumers by listening, innovating and leading.

Our Values

Be a best practice regulator: transparent, consistent, proportional, accountable, and targeted.

Be a united team.

Be collaborative and co-operative.

Be professional.

Listen and explain.

Make a difference.

Act with integrity.

Abstract

This paper details our proposals in regards to the review of the Utility Regulator's (UR) Consumer Protection Strategy (CPS) which was launched in 2016. We have reviewed and revisited the CPS, and made the decision that there will no longer be a standalone CPS. Rather, within our new Corporate Strategy (2019-2024) there will be an identifiable Consumer Protection Programme (CPP) due to begin in April 2019. The CPP will be central to the UR Corporate Strategy. The proposed CPP will be a prioritised 3 year programme; building on the strong foundation of work that has gone before, both within the CPS and throughout UR. This consultation paper seeks views and feedback on our proposals. We intend to hold a workshop during the consultation period and publish our final decisions in early 2019. CPP projects which are not prioritised into the 3 year timeframe will be reconsidered at a planned CPP review point for 2022. It is our intention to review the CPP at the end of the 3 year delivery period. The UR has also published separate decisions in regards to measures designed to enhance the market functions and information for non-domestic customers.

Audience

This document is most likely to be of interest to regulated companies in the energy and water industries, consumer organisations, community and voluntary organisations, natural gas, electricity and water consumers, government and other statutory bodies.

Consumer impact

Each of the projects identified is expected to have a positive impact on domestic electricity, gas and water consumers. The costs and benefits of each project will be identified during the scoping phases of the individual projects.

Contents page

Glossary and Acronyms	4
Executive Summary	6
Equality Considerations	13
Introduction	15
Consumer Protection Strategy	19
Review Process	29
Proposed Consumer Protection Programme	32
Conclusions and Next Steps	49
Annex 1 (Consumer Summit Report)	51

Glossary and Acronyms

BEIS	Department for Business, Energy and Industrial Strategy
CCNI	Consumer Council for Northern Ireland
CEAG	Consumer Engagement Advisory Group
CEAP	Consumer Engagement Advisory Panel
CEER, CBRRET, and WAREG	European Research Groups
CEOG	Consumer Engagement Oversight Group
CMA	Competition and Markets Authority
CPP	Consumer Protection Programme
CPS	The UR's Consumer Protection Strategy
DfE	Department for the Economy
DfC	Department for Communities
GB	Great Britain
HECA	Home Energy Conservation Authority
NAO	National Audit Office

NI	Northern Ireland
Ofgem	Economic regulator of the energy sector in GB
UKRN	UK Regulators Network; an organisation formed by 13 regulators throughout the UK each representing different sectors of the economy
UR	The Northern Ireland Authority for Utility Regulation

Executive Summary

This paper seeks comments and suggestions, from stakeholders, on the UR's current thinking on how domestic electricity, gas and water consumers will be protected in the Northern Ireland for the next three years.

The Consumer Protection Strategy (CPS) is the UR's flagship strategy and action plan designed to bring about an enhanced level of domestic consumer protection. The CPS was launched in early 2016 and is heavily referenced by consumer and political representatives. The CPS contained a commitment to have a review following year 2.

We have reviewed and revisited the CPS, and made the decision that there will no longer be a standalone CPS. Rather, within our new Corporate Strategy (2019-2024) there will be an identifiable Consumer Protection Programme (CPP). The CPP will be central to the new UR Corporate Strategy. The proposed CPP will be a 3 year programme; implementation of which will contribute to the delivery of the objectives identified in the UR's new Corporate Strategy. It will build on the strong foundation of the consumer protection work that has gone before, both within the CPS and throughout the UR. As the Corporate Strategy is a 5 year strategy, it is envisaged that CPP projects which have not currently been prioritised for delivery within the CPP 3 year timeframe will be reconsidered, depending on circumstances at that time and post a review of the 3 years of the CPP, within the Corporate Strategy 5 year delivery programme.

The review of the CPS is taking place at a time when the strategic focus on consumer outcomes in regulated sectors, especially for the most vulnerable, has never been higher. It is clear that a renewed emphasis has emerged which focuses on fairness, protection and positive consumer outcomes and regulators

are being challenged to act robustly to prevent harm to consumers and ensure all consumers achieve positive and fair outcomes in the regulated sectors.

As an example of this focus, the Department for Business, Energy and Industrial Strategy (BEIS) has recently (April 2018) published a Consumer Green Paper entitled, 'Modernising Consumer Markets'. This paper states clearly, "*firms should not prosper from taking advantage of some groups of consumers*", they go on to say that "*consumers ought to be able to trust that they will be treated well both because firms recognise it is the right thing to do and because regulators will act if they do not*"¹. This policy direction is reflected in the proposals included in this paper for the new CPP.

Regulatory Best Practice

It is appropriate that the UR refreshes its thinking and plans for consumer protection in Northern Ireland in order to ensure the delivery of consumer protection best practice. Also, the UR will always make itself aware of, and engaged in, changes that are taking place outside of Northern Ireland in regards to consumer issues. The proposals in this consultation stem from initial consultation and discussions with stakeholders in Northern Ireland to review our existing CPS and define new best practice for UR in terms of consumer protection. The proposals are also influenced by learning from emerging best practice across regulated sectors in GB.

CPS Review Process

In order to facilitate the review of the CPS the UR held a Consumer Summit; providing attendees with the opportunity to engage directly with the UR and input into the shaping of priorities that the UR will set to protect consumers for the next 3 years. Information gathered from the Summit has been included in this

¹ Department for Business, Energy and Industrial Strategy, 'Modernising Consumer Markets: Consumer Green Paper', April 2018.

consultation paper (**Annex 1**). We intend for this engagement to be ongoing with a wide range of consumer representatives from the community and voluntary sector. The principal output of the review will be a new CPP, which will be a series of consumer focused projects to be delivered across 3 years and prioritised into years 1-3 which we will consult upon via this paper.

Proposed Consumer Protection Programme

The proposals in this consultation paper are intended to ensure that over the next 3 years the CPP projects take account of the changing context and landscape in which they are delivered. We intend to hold a workshop during the consultation period and intend to publish our CPP final decisions in early 2019. As the Corporate Strategy is a 5 year strategy, it is envisaged that CPP projects which have not currently been prioritised for delivery within the CPP 3 year timeframe will be reconsidered, depending on circumstances at the end of the initial 3 years and post a review of the 3 years of the CPP, within the Corporate Strategy 5 year delivery programme. The learning and insight we have gained from proactively engaging with the community/voluntary, statutory, and industry partners on consumer protection issues will form an important input, not only to the CPP but also to the new Corporate Strategy (2019-2024) going forward.

Proposed CPP project tables

Below are 3 tables which show the proposed priority projects that will form the 3 year CPP. The proposed projects have been grouped into 3 delivery timeframes: top priority projects to be delivered in years 1 and 2; second priority projects to be delivered in year 3 of the CPP; and finally the projects which are not currently prioritised for delivery within the 3 year CPP timeframe. However, it is envisaged that CPP projects which have not currently been prioritised for delivery within the CPP 3 year timeframe will be reconsidered, depending on circumstances and post a review of the 3 years of the CPP, within the Corporate Strategy 5 year delivery programme.

Priority projects for CPP Years 1 and 2

Objective	Proposed Project
Affordability	Consumers experiencing an unforeseen change in circumstance which heightens their vulnerability (a) improved early identification of customers at risk of crisis and (b) ensure that customers made vulnerable through unforeseen circumstances (e.g. bereavement or health issue) are protected
	Energy efficiency services provision review & work with partners on energy saving schemes and provision. Partners include DfE and DfC
	Examine back-billing arrangements in NI and ensure they operate fairly
Equal Access	Review and develop consumer engagement by Network companies
	Review Quick Check 101
Empowerment through education and transparency	Deliver Retail Energy Market Monitoring: Consumer Insight Market Analysis to include both internal and external publication aspects
	Deliver new published content to help educate/empower consumers and stakeholders about energy market and consumer outcomes
Leadership and Engagement	Consumer Insights Tracker (CIT): a new baseline of domestic consumer outcomes, attitudes and experiences in relation to energy markets
	Investigating and delivering Best Practice approaches by regulated companies to vulnerable consumer protection, such as (a) staff training, (b) practical measures and (c) signposting and engaging in multi-agency approaches

	UR stakeholder and consumer engagement
	UR to take part in working groups across national and regional government, industry and the EU to capture best practice approaches which are advantageous to consumers and can be delivered in NI
	UR to work with UKRN and CMA on consumer protection projects and best practice

CPP projects Year 3

Objective	Proposed Project
Equal Access	Supplier Care Registers Review
	Consider extension of Quick Check 101 to suppliers
Empower through education and transparency	Review electricity GSS
Leadership and Engagement	Establish consumer/industry/UR group for consumer issues

CPP projects not currently prioritised during Years 1-3

Objective	Proposed Project
Affordability	Suppliers Debt Communication Review
	Examine potential for supplier charities e.g. hardship funds
	Review energy efficiency Code of Practice requirements

	Review energy consumer pathways to the best deals
Equal Access	Accessibility issues for consumers e.g. relocation of prepayment meters
	Review equality of access for consumers who have no access to a bank account and or no internet access
Empowerment through education and transparency	Tenants' rights in relation to utility services
	Performance metrics and reporting on vulnerable consumer protection measures across regulated companies

Consultation Questions

We ask that consultees respond to the following questions:

Q1: Do respondents share the view of UR that the equality impacts of the proposed CPP are positive and therefore do not require a full screen? If yes, please provide details of any evidence you feel UR should consider.

Q2: Do respondents agree with the proposal to expand the existing CPS Leadership objective to become Leadership and Engagement for the reasons set out in this paper?

Q3: Are the projects included in tables 9, 10 and 11 the full list of projects that respondents want to see included in CPP? Do you agree with the proposed prioritisation of the projects listed?

Q4: Are respondents content with the projects contained in table 11 which are not currently prioritised within the 3 year timeframe of the CPP? And are respondents content that the need for and priority of these projects will be re-examined following year 3 of the CPP?

Q5: Further to the previous consultation questions, do respondents have any general comments on the overall proposed CPP? Please provide evidence to support your answer.

Next Steps

The UR invites comments and suggestions on the proposed projects and prioritisation of the CPP for the next three years.

This consultation will close at **3pm on Friday 7th December 2018**.

The UR intends to hold a workshop during this consultation; following this we will publish our final decisions in early 2019.

Equality Considerations

As a public authority, the UR has a number of obligations arising from section 75 of the Northern Ireland Act 1998. These obligations concern the promotion of equality of opportunity between:

- persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- men and women generally;
- persons with disability and persons without; and
- persons with dependants and persons without.

The UR must also have regard to the promotion of good relations between persons of different religious belief, political opinion or racial groups. In the development of its policies the UR also has a statutory duty to have due regard to the needs of vulnerable consumers i.e. individuals who are disabled or chronically sick, individuals of pensionable age, individuals with low incomes and individuals residing in rural areas. Some of the above equality categories will therefore overlap with these vulnerable groupings.

In order to assist with equality screening of the proposed CPP, the UR requests that respondents provide comments on the equality impact of the CPP and provide any information or evidence in relation to the needs, experiences, issues and priorities for different groups which you feel are relevant to the implementation of any of the proposals.

Consultation Question

We ask that consultees respond to the following question:

Q1: Do respondents share the view of the UR that the equality impacts of the proposed CPP are positive and therefore do not require a full screen? If yes, please provide details of any evidence you feel UR should consider.

Introduction

The UR launched its Consumer Protection Strategy (CPS) in 2016. We made a commitment to review the CPS following 2 years of project delivery in order to ensure that Northern Ireland benefits from best practice regulation; this milestone was reached in April 2018. This paper consults on a proposed new Consumer Protection Programme (CPP) commencing in April 2019. We have now refreshed our thinking and the CPP will form a separately identifiable and vital part of our new Corporate Strategy (2019-24).

This paper provides information on the following:

- 1) the CPS review process;
- 2) the new proposed CPP objectives; and
- 3) the proposed CPP projects.

Context of the Review

In 2016, the UR's CPS decision paper stated that consumer protection is at the heart of everything we do. Since the publication of the CPS, the political and societal discourse has emphasised the importance of consumer protection in a new and enhanced way. In the past, regulators were expected to protect the interests of consumers primarily through the promotion of competitive markets and the regulation of monopoly networks. Whilst regulators have existing provisions to have due regard for the needs of defined groups of vulnerable customers, this has tended to be secondary to the promotion of competition, which it was thought would adequately deliver the best outcomes for consumers. Fairness of outcomes for all consumers and the needs of those who are unable to engage with the competitive market have now been given a new emphases. This is due to the evolution in thinking in GB in regards to consumer outcomes. This development in thinking in GB has its foundations in the realisation that market outcomes have at times failed certain consumer groups.

It is clear from policy discussions and strategic statements in GB that society's expectations of what markets, particularly essential services and regulated markets such as energy, should deliver for all customers has changed. Fairness of market outcomes for all customers, including those in vulnerable circumstances, has become a fourth element to be equally considered in regulatory policy alongside price, security of supply, and sustainability.

Understanding of Vulnerability

The UR's CPS decision paper in 2016, recognised that any consumer could be considered vulnerable given a particular set of circumstances. Thus, that paper concluded that a high degree of protection needs to be in place for all domestic consumers with a particular emphasis on circumstances (rather than individual characteristics) which could result in customers becoming vulnerable. Consequently, the CPS decision paper recognised that 'vulnerability' is not necessarily a permanent characteristic but rather a fluid state.

Following publication of the CPS decision paper, the concept of vulnerability has developed further in the UK wide discourse. Society's understanding of vulnerability has developed; moving from being restrictively based on defined customer groups, to an understanding that anyone can be vulnerable given a combination of circumstances. These circumstances can be complex, are often multi-dimensional, and can be fluid, with people moving in and out of positions of vulnerability. It is therefore not appropriate to limit vulnerability to something that only affects specific customer groups.

Consumers' circumstances are not the only factor impacting on the risk of harm to consumers. Company policy, practice and behaviour can be equally important in contributing to consumers being at greater risk of vulnerability and of that risk crystallising into detriment. Company policies and procedures to assist customers in vulnerable circumstances ought to be viewed from the perspective of the consumer receiving the support, this will be the focus of this review and our

collective work.

Consumer Protection and Fairness

One of the key regulatory discussions in GB is the shift in emphasis, for regulators, to focus on fairness as equal to competition and efficiency. This is evidenced through a number of recent publications, for example the National Audit Office (NAO). The NAO report on '*Vulnerable Customers in regulated industries in GB*', included a review of the following agencies (1) Office of Gas and Electricity Markets (Ofgem), (2) the GB Water and Sewerage regulator (Ofwat), (3) the Financial Conduct Authority (FCA) and (4) the communications regulator (Ofcom).

This NAO report considers the following:

- the experiences of vulnerable consumers and whether regulators understand vulnerability in their sectors;
- whether key organisations, and regulators in particular, have clear roles, responsibilities and objectives; and
- how effectively firms and regulators identify and support vulnerable consumers, and monitor progress.

The NAO report noted that “none of the regulators [reviewed] has yet translated its high-level aims on vulnerability into detailed objectives”², it recommended that regulators and government should work together to:

- clearly define roles and responsibilities for supporting vulnerable consumers, while recognising regulators' independence; and
- proactively explore options to enhance data-sharing that would allow better identification of, and support for, consumers in long-term or permanent vulnerable circumstances.

² National Audit Office, 'Vulnerable customers in regulated industries', 31 March 2017

The NAO report has led to a new consumer vulnerability cross-sector taskforce in GB, and UKRN interaction with that taskforce.

The UKRN has worked to present a more consumer focused discourse in recent times and has established a work stream, which UR contributes to, to look at consumer vulnerability across the regulated sectors.

Furthermore, BEIS is creating a new Consumer Forum chaired by the Minister for Consumer Affairs to discuss overarching priorities for the regulated sectors. This joint government-regulator Consumer Forum will comprise senior representatives from across government and regulators, bringing in other experts, such as the Competition and Markets Authority (CMA), as appropriate. It will have a particular focus on vulnerability and will be acting on the NAO recommendations.

Regulation does not and should not take place in a vacuum; rather it must be responsive to change in both markets and consumer circumstances. Therefore, the UR has noted this policy shift towards a more consumer outcome focused form of regulation. The UR seeks to incorporate the themes of this new strategic thinking into the proposed CPP in order to ensure that all relevant best practice is captured and delivered for consumers in Northern Ireland. The will build upon the existing levels of consumer protection that have been delivered through the CPS to date and work across the UR (including license compliance, price controls, Codes of Practice and more).

Rationale for Consumer Protection Measures in Northern Ireland

The UR recognises that there is still a need to have a specific set of protection measures in place for domestic consumers in Northern Ireland and in particular for vulnerable customers. The delivery of the CPS has resulted in an enhanced level of protection for domestic consumers and we wish to build upon this further through the delivery of the new CPP.

Consumer Protection Strategy (2016)

This section of the paper provides some background information on the CPS, which was published in 2016. The strategic objectives and projects that make up the CPS are listed below. Following 2 years of delivery, we have reviewed the CPS. The review takes account of the changing consumer protection context and landscape in which regulation sits. Also included in this section is a summary of the achievements of the CPS to date; this can be seen in the projects delivered and the highlighted consumer benefit from each of these delivered projects.

CPS objectives

The CPS contained four strategic objectives. These objectives were as follows:

1. a focus on **affordability**;
2. **equal access** to utility services;
3. **empowerment** of consumers through education, transparency and responsibility; and
4. providing **leadership** through being a best practice regulator and working with others.

A number of projects were then developed ensuring that each of the above objectives would deliver enhanced consumer protections for consumers in Northern Ireland, particularly vulnerable customers. The activities associated with each of these strategic objectives are summarised in the table 1 below:

Table 1: Year 1 CPS Strategic objectives and actions

Year 1	Key Actions
Objective 1: Focus on affordability	Billing Code of Practice for Energy Suppliers
	Code of practice on Energy Theft
	Work with partners in relation to energy saving schemes, in particular in relation to the DfE led EnergyWise project and DfC in relation to DfC led projects
Objective 2: Ensure equal access to utility services.	Review network company Critical Care/Customer Care Registers (NIE Networks/NI Water)

	Work with stakeholders to improve customer confidence when utility company staff visit their home
Objective 3: Empower Consumers through education and transparency	Work with others to develop educational materials on switching
	Work with others in improving tariff comparison options
	Establish Gas Supplier of Last Resort

Table 2: Year 2 CPS Strategic objectives and actions

Year 2	Key Actions
Objective 1: Focus on affordability	Scope work in relation to Back Billing Protocols
	Review Energy Efficiency Code of Practice requirements
Objective 2: Ensure equal access to utility services.	Review energy supplier customer care registers
Objective 3: Empower Customers through education and transparency	Review Electricity GSS/OSS
	Review of Consumer Check List
Review following year 2 to include Consumer Summit	

Table 3: Years 3-5 CPS Strategic objectives and actions

Years – 3-5	Key Actions
Objective 1: Focus on affordability	Work with suppliers on debt communication from suppliers
	Work with others on helping consumers in crisis
Objective 2: Ensure equal access to utility services.	Examine accessibility issues for consumers
	Review & develop consumer engagement by Network Operators
Objective 3: Empower Customers through education and transparency	Work on issues for tenant rights in relation to utility services
	Increased tariff transparency
	Work with others on financial inclusion and inclusion generally

Table 4: Ongoing CPS Strategic objectives and actions

Ongoing projects to be progressed throughout the term of the strategy	
Objective 2: Ensure equal access to utility services.	Major incident protocols will be progressed throughout the strategy. However in year 1 we will organise a communications forum between the electricity, gas and water industries to facilitate cross industry learning and best practice
Objective 4: Providing Leadership Through being a Best Practice Regulator	Provide best practice example via Codes of Practice (COPs)
	Participate in working groups across government/industry
	Work with European groups such as and CERRE on research projects
	Work with UR Regulator’s Network and UK Competition Network (UKRN)

CPS Achievements

The delivery of the CPS projects has been ongoing for two years. During this time, a number of key projects have been completed. The CPS has delivered many successful outcomes for consumers in Northern Ireland, these achievements are listed in table 5. These projects have been delivered through partnership working, an approach which we wish to continue into CPP.

The table 5 provides a full list of the CPS projects that have now been delivered. These CPS projects listed in table 5 have provided meaningful enhanced consumer protection, particularly for vulnerable customers.

Table 5: CPS achievements to date

Objectives	Status	CPS Project
Affordability		
	✓	Energy Theft Code of Practice

	✓	Bills and Statements Code of Practice
	✓	Energy efficiency work
Equal Access		
	✓	Network Care Register Review
	✓	Quick Check 101 Scheme
	✓	Major incident review communication forum
	✓	Network Companies relationship with consumers
Empowerment		
	✓	Educational materials on Switching
	✓	European Consumer Checklist
	✓	Price comparison tool
	✓	Gas Supplier of Last Resort
Leadership		
	✓	Work with European groups e.g. CERRE
	✓	Work with UK Regulator's Network

CPS Delivery

Successful delivery of the CPS projects, listed in table 5 above, has relied heavily on robust partnership working across many sectors including industry, statutory and community/voluntary. Below is a short narrative on each of the CPS projects delivered in the past two years and the consumer benefit that has been delivered as a result.

Project delivered under the objective of Affordability

Energy Theft Code of Practice

Final decisions on the Energy Theft Code of Practice have been published following an extensive period of engagement with industry and two rounds of consultation. Industry will now deliver the detailed procedures to implement and comply with this new Code. Industry will report to UR on compliance with this new Code of Practice.

Bills and Statements Code of Practice

From January 2018 all suppliers have to implement the necessary changes to their bills and statements to ensure full compliance with this new Code of Practice. This is the first Code of Practice which includes significant elements of principle-based regulation.

Energy Efficiency work

UR continues to work with DfE in regards to the now postponed EnergyWise Scheme. We have agreed to the continuation of the NISEP (Northern Ireland Sustainable Energy Programme) in order to allow time for the development of an alternative. We have also commenced working with DfE on reviewing both the NISEP and the need for the NISEP or a replacement energy efficiency programme funded by customers. We continue to engage with DfC in regards to the Boiler Replacement Scheme and 'Affordable Warmth'. It is intended that our work will help to inform the government's energy efficiency policy direction.

Project delivered under the objective of Equal Access

Network Care Register Review

In the CPS, we made a commitment to review the Care Registers held by Northern Ireland Electricity Networks (NIE Networks) and Northern Ireland Water (NI Water). These registers provide certain services to vulnerable consumers who choose to be included on Care Registers. The Care Register review final

decisions paper (published in March 2018) contained 10 proposals for the improvement of promotion, awareness and uptake of care registers. The UR is working on an ongoing basis with NIE Networks and NIW to deliver all the proposals in the paper.

Quick Check 101 Scheme

The Quick Check 101 Scheme is a collaboration between the PSNI and energy and water network companies, supported by the Commissioner for Older People and the UR, in a bid to help people feel safer in their homes. Quick Check 101 was launched in January 2018 and will initially run for one year as a pilot programme. Following a year of operational delivery, the UR will review Quick Check 101 and outline next steps.

Major incident review communication forum

The Communication Forum was held in 2016 and was well attended by a wide variety of stakeholders. The forum benefited from the participation of the UK Information Commissioner, who discussed Data Protection issues that concern both the Industry and consumer bodies. Each of the Network companies presented; highlighting their processes and procedures for both Critical Care/Customer Care Registers and Major Incidents. The Forum was branded with both the UR and the Consumer Council's logos, highlighting our partnership approach to the delivery of the CPS. The forum allowed electricity, gas and water network companies to speak directly with those organisations who represent vulnerable customers. It was successful in that it increased awareness of procedures to protect vulnerable customers during a major incident and it also allowed the network companies to listen to organisations who represent vulnerable customers. The network companies also benefited from being able to share best practice.

Network companies relationship with consumers

Our major network price controls continue to build on the widely appreciated consumer research which underpinned previous price controls for NI Water. The collaborative partnership model we have developed locally continues to deliver for the consumer, especially where expertise is pooled across companies, Consumer Council, government departments and within UR.

For water, our collaborative group remains the Consumer Engagement Oversight Group (CEOG).

For the price control of NIE Networks, both the company business plan and our determination were underpinned by rigorous consumer research and engagement, commissioned by the Consumer Engagement Advisory Panel (CEAP) using Perceptive Insight Market Research, a local research house with academic input from Queen's University, Belfast. The research established the relative, and often competing, priorities across different electricity consumer groups as well as user groups. We expect NIE Networks to continue its journey of consumer and stakeholder engagement throughout the next 6½ years of the new NIE Networks price control period. The CEAP group has been restarted to carry forward the work in the new price control.

For the local gas distribution network companies we expect the same continuous engagement with a re-constituted Consumer Engagement Advisory Group (CEAG) along the same lines at the CEAP and CEOG.

Project delivered under the objective of Empowerment

Educational Materials on Switching

We have collaborated with the Consumer Council on the development of a Switching leaflet, aimed at consumers who do not have access to the internet. This Switching leaflet provides information on the process of switching supplier and counteracts some myths that have been associated with switching e.g. that

supply might be interrupted.

European Consumer Checklist

A reviewed European Consumer Checklist was published in March 2018.

Engagement with the Consumer Council is currently underway to produce a quick reference 'consumer friendly' guide to accompany the checklist.

Price comparison tool

In June 2016 the Consumer Council launched an independent online energy price comparison tool. This enables the quick and easy comparison of electricity and natural gas tariffs for all suppliers in Northern Ireland. Since its launch and up to the end of May 2018, the price comparison tool has been visited 130,262 times.

Gas Supplier of Last Resort (SoLR)

The UR has published an information paper and licence consultation in regards to Gas SoLR. The arrangements now offer protection to all gas customers in the unlikely event that their supplier exits the market. We have also agreed with industry that we will review and prioritise the day 2 issues and scope Gas SoLR testing.

Project delivered under the objective of Leadership

Work with European groups

We continue to monitor issues coming from Europe. In particular issues relating to Brexit. We will continue to engage with a number of groups. As regards Brexit, the Consumer Concurrency Group of the CMA is considering the consumer policy implications of Brexit. We will keep a watching brief on lessons learnt for Northern Ireland.

Work with UK Regulators Network (UKRN)

We continue to follow an evidence-based approach, using up-to-date and relevant reports on key consumer-related matters. We continue to be represented on a number of groups including UKRN and more locally the HECA panel. The UR has

joined the Consumer Concurrency Group and Enforcement Forum of the CMA. All of these forums ensure UR is able to provide best practice regulation for NI consumers. We continue to contribute to the delivery of UKRN projects including affordability, switching and vulnerability related work streams.

Scope back-billing project

The scoping phase has now been fully progressed and the UR now intends to proceed with a back-billing review in years 1-2 of the new proposed CPP.

The success of all of the above projects have relied on collaboration and partnership working. These projects could not have been delivered without the continued support of our industry and consumer partners; allowing for positive outcomes for consumers in Northern Ireland.

Outstanding CPS projects

The CPS contained a prioritised list of projects for delivery during years 1 and 2. All of the year 1 prioritised projects have been delivered; helping to provide an enhance level of protections for domestic customers. However, some projects were not progressed as planned. The table below lists these projects:

Table 6: Outstanding CPS projects

Objective	Project title
Focus on affordability	Review energy efficiency Code of Practice requirements
Makes sure consumers have equal access to utility services	Review energy supplier customer care registers
Empower consumers through education and transparency	Review electricity GSS and OSS

However, each of the projects included in table 6 have been included in the delivery plan for the CPP; reflecting the lessons learned on delivery timescales from the CPS.

Review Process

This section of the paper provides information on the process that UR has undergone in order to review the CPS. The CPS review is essential to stock-take and reprioritise projects for a revised and refocused CPP; taking into account the changing consumer and fairness strategic context that has been noted throughout this paper. This changing context has driven the CPP project prioritisation that is proposed in this consultation.

Continuous engagement with stakeholders

A feature of both the development and delivery of the CPS has been continuous engagement with stakeholders. There has been sustained engagement and consultation with stakeholders throughout the development of the CPS and the 2 years of project delivery. We intend to continue with this approach, ensuring that stakeholders have opportunities to inform our plans for consumer protection in Northern Ireland for the next 3 years.

Compendium of GB notable consumer focused publications

As we embarked upon the review of the CPS, we decided to examine the current consumer protection best practice across the UK. In order to do this, we developed an internal document which became a compendium of notable consumer focused publications from GB. The document captured some of the consumer protection measures that are being used in GB and allowed the UR to review lessons learned from GB. We then made an assessment as to the appropriateness of these measures for the Northern Ireland retail energy market. The learning that was taken from these measures has been reflected in the project prioritisation of the CPP.

Consumer Summit

The CPS contained a commitment to hold a Consumer Summit following year 2. This Summit, which was held in April 2018, marked the beginning of the formal

review of the CPS. The Summit has provided the evidence base for the proposed CPP included in this consultation paper. The review of CPS started with the Consumer Summit, which provided attendees with an opportunity to shape the policy priorities the UR will set in order to protect consumers in Northern Ireland.

In order to ensure a comprehensive outcome and the maximum level of stakeholder engagement, the UR used the services of an external facilitator to conduct the Consumer Summit. The facilitator guided workshops at the Summit and provided a report to the UR which captured the key findings from the day. This written report was a factual account of the Consumer Summit, detailing what was said from the assembled stakeholders. The full external facilitator's report can be found at **Annex1**.

The Summit had two goals:

1. To provide Summit participants with key information on recent major changes in the energy and socio-economic context that impact on utility consumers in NI; and, subsequently,
2. To invite participants to give their views on how the existing CPS might be refined / reshaped to address the current context and challenges.
Specifically, participants were invited to consider and deliberate on:
 - the continuing relevance of the existing objectives;
 - the need for new / refined objectives;
 - the need for new actions; and
 - the need for UR to have further information to enable it to prioritise its work and assess its impact/effectiveness.

The Summit was one of a series of steps taken by the UR to review the CPS. The output from the Summit has informed this consultation paper and the proposed CPP.

Consultation Seminar on the proposed new CPP

A structured seminar will be held during this paper's consultation period; presenting another opportunity for stakeholders to discuss the proposed programme of consumer protection for the next 3 years. Furthermore, the UR plans to host another forum to facilitate direct stakeholder engagement with the UR, as we develop our final decisions in relation to the new CPP.

Proposed Consumer Protection Programme (2019-2022)

Following the Consumer Summit, the UR has developed a proposed CPP. We have made the decision that there will no longer be a standalone CPS. Rather, within our new Corporate Strategy (2019-2024) there will be an identifiable CPP. The CPP will be central to the UR Corporate Strategy. The proposed CPP will be a 3 year programme of projects. Each project is designed to provide enhanced consumer protections, and build upon a strong consumer protection base that is already in place due to the CPS and existing regulatory protections such as licence compliance, supplier Codes of Practice, price controls and ensuring markets are efficiently designed.

Objectives for proposed CPP

A number of objectives have been identified for the proposed CPP. These objectives are based on the findings captured at the Consumer Summit. The external facilitator's full written report from the Consumer Summit can be found at **Annex 1**.

The feedback from the participants at Summit suggests that each of the existing objectives of the CPS, namely Affordability, Equal Access, Empowerment and Leadership, are still relevant. The three most important objectives are, in this order:

- 1st - affordability;
- 2nd - equal access; and
- 3rd - empowerment.

Attendees at the Summit also noted a number of additional objectives which they felt should be included in the proposed CPP going forward. Objectives such as

‘Listening and Understanding’ and the ‘Consumer Journey’ featured prominently. These additional objectives are included in the table 7 below:

Table 7: CPP objectives emerging from the Summit

Objective	Actions proposed
Consumer Journey	<ul style="list-style-type: none"> Following the stages of the customer journey and experience and better understanding the needs at each stage
Innovation	<ul style="list-style-type: none"> Consider introducing software that benefits consumers e.g. highlights and facilitates switching to best offers
Listening/ Understanding	<ul style="list-style-type: none"> Need to listen to and understand consumer opinions, views, needs, priorities, preferences, capacities Outcomes based working
Policy Clarity	<ul style="list-style-type: none"> Refine from using overly technical language and terminology in public documents Set out clearly the implications of decisions

Table 8 below shows the preferences of the attendees of the Summit in regards to the existing objectives and the new objectives (**in bold**) that have been discussed above.

Table 8: Summit views on priority of objectives for new CPP

Objective	Percentage	Number
Affordability	27	57
Equal Access	18	39
Empowerment	16	33
Listening/understanding	13	27
Customer Journey	10	22
Policy clarity	6	12

Leadership	6	12
Innovation	4	9

It can be seen from the table above that Affordability, Equal Access and Empowerment are the top 3 rated objectives obtaining 27%, 18% and 16% of the vote respectively. The new suggested objectives of Listening and Understanding and Consumer Journey also received a significant share of the vote, attracting 13% and 10% respectively. Stakeholders at the Summit also suggested that engaging and understanding consumers' needs, priorities and experience are important.

Consequently, the UR is proposing to amend the existing Leadership objective so that it becomes **Leadership and Engagement**. We propose that the expanded objective will include projects aimed at addressing the suggestions discussed at the Summit.

It is proposed that the Leadership and Engagement objective will include projects aimed at:

- increased and better engagement to improve listening and understanding;
- conducting research to better understand customer needs/journey;
- publication of research results and other information in an easy to understand manner to inform the policy debate; and
- work to ensure that we engage with stakeholders to ensure that we listen to and understand the stakeholders and ensure that all policy decisions and publications from the UR are clear and easy to understand.

Consultation Question

We ask that consultees respond to the following question:

Q2: Do respondents agree with the proposal to expand the existing CPS Leadership objective to become Leadership and Engagement for the reasons set out in this paper?

As the 4 existing CPS objectives were endorsed at the Summit, the proposed CPP projects are split into these four objectives; namely Affordability, Equal Access, Empowerment and the new expanded objective of Leadership and Engagement.

CPP project priorities

In order to have a meaningful consultation, the UR has proposed an initial prioritisation of the proposed CPP projects. This prioritisation is based on, progress with the existing CPS, feedback from stakeholders at the Summit, UR's review of progress in GB and discussions within the UR and with UR Board. **This proposed project prioritisation of the CPP is at the core of this consultation exercise and we very much welcome views on the contents of tables 9, 10 and 11.**

Stakeholders proposed an extensive list of potential projects for inclusion in the CPP. Internally, we have undertaken a process of rationalisation and refinement of these project suggestions. We carried out this process for a number of reasons which include compatibility with our legal powers and duties.

Table 9 shows the proposed top priority projects (for years 1 and 2 of the new CPP), table 10 the second priority projects, and table 11 the projects which are

not currently prioritised for delivery within the 3 year time frame. However, the CPP will be a rolling programme and as such will be able to grow and respond to changing consumer circumstances and priorities as they arise throughout the 5 year of UR's Corporate Strategy. As the Corporate Strategy is a 5 year strategy, it is envisaged that CPP projects which have not currently been prioritised for delivery within the CPP 3 year timeframe will be reconsidered, depending on circumstances and post a review of the 3 years of the CPP, within the Corporate Strategy 5 year delivery programme. The CPP will build upon the good work of CPS and existing UR consumer protection foundations.

Table 9: Priority projects for CPP Years 1 and 2

Objective	Proposed Project
Affordability	Consumers experiencing an unforeseen change in circumstance which heightens their vulnerability (a) improved early identification of customers at risk of crisis and (b) ensure that customers made vulnerable through unforeseen circumstances (e.g. bereavement or health issue) are protected
	Energy efficiency services provision review & work with partners on energy saving schemes and provision. Partners include DfE and DfC
	Examine back-billing arrangements in NI and ensure they operate fairly
Equal Access	Review and develop consumer engagement by Network companies
	Review Quick Check 101
Empowerment through education and transparency	Deliver Retail Energy Market Monitoring: Consumer Insight Market Analysis to include both internal and external publication aspects

	Deliver new published content to help educate/empower consumers and stakeholders about energy market and consumer outcomes
Leadership and Engagement	Consumer Insights Tracker (CIT): a new baseline of domestic consumer outcomes, attitudes and experience in relation to energy markets
	Investigating and delivering Best Practice approaches by regulated companies to vulnerable consumer protection, such as (a) staff training, (b) practical measures and (c) signposting and engaging in multi-agency approaches
	UR stakeholder and consumer engagement
	UR to take part in working groups across national and regional government, industry and the EU to capture best practice approaches which are advantageous to consumers and can be delivered in NI
	UR to work with UKRN and CMA on consumer protection projects and best practice

Table 10: CPP projects Year 3

Objective	Proposed Project
Equal Access	Supplier Care Registers Review
	Consider extension of Quick Check 101 to suppliers
Empower through education and transparency	Review electricity GSS
Leadership and Engagement	Establish consumer/industry/UR group for consumers issues

Table 11: CPP projects not currently prioritised during Years 1-3

Objective	Proposed Project
Affordability	Suppliers Debt Communication review
	Examine potential for supplier charities e.g. hardship funds
	Review energy efficiency Code of Practice requirements
	Review energy consumer pathways to the best deals
Equal Access	Accessibility issues for consumers e.g. relocation of prepayment meters
	Review equality of access for consumers who have no access to a bank account and or no internet access
Empowerment through education and transparency	Tenants' rights in relation to utility services
	Performance metrics and reporting on vulnerable consumer protection measures across regulated companies

Consultation Questions

Based on the 3 tables above, we ask that consultees respond to the following questions:

Q3: Are the projects included in tables 9, 10 and 11 the full list of projects that respondents want to see included in CPP? Do you agree with the proposed prioritisation of the projects listed?

Q4: Are respondents content with the projects contained in table 11 which are not currently prioritised within the 3 year timeframe of the CPP? And are respondents content that the need for and priority of these projects will be re-examined following year 3 of the CPP?

CPP projects

Below is a short description of each of the proposed CPP projects included in tables 9, 10 and 11 of this paper. Each of these projects have been included and prioritised due to the consumer benefit it will deliver in Northern Ireland.

CPP projects Year 1 and 2

The projects described below have been included in table 9 and are proposed for delivery during years 1 and 2 of the CPP and as such are seen as top priority projects. Each project is described under the associated objective that its delivery will help to fulfil.

Projects to be delivered under the objective of Affordability

Consumers experiencing an unforeseen change in circumstance which heightens their vulnerability

In the existing CPS, this project was formerly known as “Consumers in Crisis” this project seeks to build on the relationship and partnership working that started during the CPS amongst the delivery partners; namely industry and the community/voluntary sector. A consumers experiencing an unforeseen change in circumstance which heightens their vulnerability could have experienced the following;

- bereavement;
- health concern; and
- redundancy.

This is not an exhaustive list but provides an illustration of the types of changing circumstances that may bring about a 'crisis' situation for a utility consumer and exposes them to an 'income shock' through a life changing event. This project aims to provide help and assistance to consumers who are experiencing a 'crisis' situation.

The core objective of this project is to identify best practice, adopt and make consistent across all suppliers and network companies. The project would seek to harness the consumer intelligence that each of our delivery partners currently has. Through this approach consumers could be more easily (a) identified, (b) sign posted and (c) provided with the necessary support. All of these interventions may mainly be non-financial but should bring about a positive outcome for consumers and prevent a crisis situation worsening. The positive outcomes, demonstrated by those working in the advice giving agencies, of early intervention for customers, is an approach that the UR wishes to replicate with this project. Early intervention can prevent a customer spiraling into further difficulty and is much less resource intensive for the utility company – so there are multiple merits.

Examine back- billing arrangements in NI to ensure they operate fairly

On 26 June 2018, the UR published a call for evidence to commence its 'Back billing in the NI Retail Energy Market' project. The aim of the call for evidence was to assist the UR in forming an understanding of the current extent of back-billing issues in the NI energy market, and the impact or potential impact on both domestic consumers and micro-businesses. We are currently reviewing submissions provided and will publish a further consultation document later in 2018. Any change to billing arrangements will include appropriate consultation and engagement during 2019/20.

Energy efficiency services provision review

The UR's 2018-19 forward work plan contains a commitment to review the Northern Ireland Sustainable Energy Programme (NISEP) and provide an assessment of the need for a replacement energy efficiency support programme. We are working with DfE and Consumer Council regarding this review.

Perceptive Insight have been appointed, by Consumer Council, to hold focus groups and in-depth interviews with consumers across Northern Ireland. This process will gather views on energy efficiency provision in Northern Ireland, and NISEP directly from consumers. Any proposals will be fully consulted upon.

UR continues to work with DfE in regard to the now postponed EnergyWise Scheme. We have agreed to the continuation of the NISEP (Northern Ireland Sustainable Energy Programme) in order to allow time for the development of an alternative. We have also commenced working with DfE on reviewing both the NISEP and the need for a replacement energy efficiency programme funded by customers.

Projects to be delivered under the objective of Equal Access

Review and develop consumer engagement by Network companies

This project has been discussed in detail on page 26 of this consultation paper. We plan to build upon the good work already achieved to date, through this project, on reviewing and developing consumer engagement by Network companies. We will continue to improve on the outcomes delivered for consumers in Northern Ireland.

Review of Quick Check 101

Quick Check 101 Scheme has been operational for 6 months, following the launch of the Scheme in January 2018. As this project was launched as a pilot, the UR

committed to review Quick Check 101 after 1 year of operational delivery. We are currently engaging with all the partners involved in delivering Quick Check 101 to assess the successfulness of Scheme to date.

Projects to be delivered under the objective of Empowerment

Retail Energy Market Monitoring: Consumer Insight Market Analysis

Retail Energy Market Monitoring (REMM) has been in place since 2015, capturing information from all suppliers and network companies across a variety of business activities and consumer interactions. The second phase of the REMM project will be referred to as Consumer Insight Market Analysis, this phase will seek to ensure the best use of the data that has been collected from industry. This will include external publication of relevant information gathered through REMM to help empower and educate stakeholders and consumers. Furthermore, improved information flows for UR and policy makers will allow for better informed policy decisions which will ultimately impact positively on consumers.

Deliver new published content to help educate/empower consumers and stakeholders about energy market and consumer outcomes

REMM CIMA will include a substantial review of how we publish our market monitoring information for both stakeholders and consumers. The aim will be to increase transparency, inform consumers and their representatives and educate stakeholders about retail market outcomes. The content and format options may include a revised Quarterly Transparency Report, new website information and easily understandable social media content.

Projects to be delivered under the objective of Leadership and Engagement

Consumer Insights Tracker (CIT)

The UR has identified the need to better understand the consumer perspective in relation to the energy sector and so we will conduct the first UR consumer

baseline research project. This survey will measure consumer engagement, experience and attitudes in the domestic energy markets in Northern Ireland. The survey outcomes will contribute to the consumer protection work of the UR going forward. It is currently envisaged that the CIT would be repeated every two years and it would be our intention that the CIT results will be published each time the survey is conducted. This will allow for much more informed regulation by UR, but also improve the ability of consumers and consumer representatives to engage in the energy market.

Investigating and delivering Best Practice approaches by regulated companies for vulnerable consumer protection

A number of best practice approaches, from GB in particular, have been raised throughout this paper and some of these approaches present new challenges to both regulators and utilities in regards to how we can effectively protect consumers. This project will aim to ensure that best practice on consumer protection issues is examined and integrated into the operations and consumer protection activities of regulated companies in Northern Ireland. Examples of this would include the provision of staff training that captures the best practice approaches to consumer service for vulnerable customers and a sharing of information on interventions and practical measures that have provided positive outcomes for consumers across regulated sectors.

UR stakeholder and consumer engagement

In order to build upon the significant engagement and partnership working that has been seen throughout the delivery of the CPS and the development of the proposed CPP, we have included a project on the policy and procedures, for the UR, around engagement. We wish to build upon the existing levels of engagement that the UR has with stakeholders in Northern Ireland. We plan to establish a forum where the consumer representative bodies, industry and the UR can interact with each other directly. We would envisage that the discussions at

the forum would be used to inform decision making at the most senior level within UR.

Further to this forum, the UR will seek to consolidate and improve existing engagement with the community and voluntary sector. Going forward this engagement would take place in a more structured way and would feed into the discussion of the forum described above.

In parallel to this stakeholder engagement, the UR are committing to improving communications we have with consumers. We plan to do this through a more comprehensive approach to accessible communications and use digital communications to support our consumer facing work. Any policy and procedures that may be put in place would aim to ensure increased transparency and clarity of information for key stakeholders.

UR to take part in working groups across national and regional government, industry and EU

The UR continues to follow an evidenced based approach, using up-to-date and relevant reports on key consumer-related matters in order to improve knowledge across stakeholder groups. This will ensure that best practice regulatory practices are imported back to Northern Ireland to the benefit of consumers.

UR to work with UKRN and CMA on consumer protection projects and best practice

The UR works closely with UKRN and CMA. We will ensure that this relationship is maintained and developed going forward, particularly in regards to sharing and receiving best practice in regards to consumer protection work streams.

CPP projects Year 3

Below is a short narrative on each of the projects that have been included in table 10 and are proposed for delivery during year 3 of the CPP. Each project is

described under the associated objective that its delivery will help to fulfil.

Projects to be delivered under the objective of Equal Access

Supplier Care Registers review

In the CPS, UR made a commitment to review supplier care registers. These registers are for customers who require additional and special services.

Electricity, gas and water companies all provide certain services to vulnerable customers who choose to be included on care registers. As set out in the CPS, the UR decided to have two consecutive reviews, the first focusing on NIE Networks and NI Water and the second focusing on gas network companies and electricity and gas suppliers. The Supplier Care Registers project refers to this second review, focusing on gas network companies and electricity and gas suppliers and the services they offer to those customers.

The review of network companies (NIE Networks and NI Water) care registers has already taken place, with a final decisions paper published in March 2018 which focused on those customers exhibiting some of the highest levels of vulnerability.

It is envisaged that the learning gathered from implementation of the best practices approaches project and the network care register review which seek to establish best practice approaches to vulnerable consumer protection in Northern Ireland, will inform the supplier care register review project. Thus the sequencing of delivery for these projects is important. We therefore propose that Supplier Care Register review takes place following the completion of the best practice themed projects (prioritised for years 1 and 2 of the new CPP), thus allowing for a more informed review of supplier care registers to take place.

Consider extension of Quick Check 101 to suppliers

The current Quick Check 101 Scheme has been delivered by the Network companies, namely NIE Networks, Phoenix Natural Gas, SGN, firmus energy and Northern Ireland Water. As the 1 year pilot comes to an end, the UR will explore

the possibility of the potential extension of Quick Check 101 to include all gas and electricity suppliers in Northern Ireland.

Projects to be delivered under the objective of Empowerment

Review electricity Guaranteed Standards of Service (GSS)

GSS set out the prescribed levels of service which consumers can expect from the network operator and supplier. An effective GSS mechanism has the potential to benefit consumers by incentivising high quality customer service and ensuring that customers receive redress for inconvenience caused by failures of electricity network companies and electricity suppliers to meet the prescribed levels of service. The current GSS regime requires review to ensure it is fit for purpose and once reviewed should ensure that consumers are informed about the minimum standards of service they can expect and the associated compensation for failure to meet these standards.

Projects to be delivered under the objective of Leadership and Engagement

Establish consumer/industry/UR groups for consumer issues

UR wishes to assess the forums in which consumer issues are discussed and developed. In order to do this the UR will facilitate the engagement and interaction between industry and consumer representative groups.

CPP projects to be reconsidered depending on circumstances and after the initial 3 years of the CPP

The CPP will be a central and identifiable component of the UR Corporate Strategy (2019-24). As the Corporate Strategy is a 5 year strategy, it is envisaged that CPP projects which have not currently been prioritised for delivery within the CPP 3 year timeframe will be reconsidered, depending on circumstances and post a review the 3 years of the CPP, within the Corporate Strategy 5 year delivery programme. The projects, from table 11, are listed below.

Project to be delivered under the objective of Affordability

Supplier debt communication review

It is envisaged that this project would lead to improved supplier debt communications with consumers who are in financial difficulty, and should result in reduced levels of consumer debt and help to avoid supplier bad debt.

Examine potential for supplier charities e.g. hardship funds

This project would examine the work of charities that operate 'food banks', 'fuel banks' and other services and scope the potential to establish a 'hardship fund' or relationship with charities for a pre-defined group of consumers who are experiencing difficulties. The UR would fully consult with industry and consumer representative groups before deciding upon an appropriate mechanism.

Review energy efficiency Code of Practice requirements

Through the development and implementation of a Code of Practice on energy efficiency, consumers would become better informed and able to manage energy efficiency improvements.

Review energy customer pathways to the best deals

This project would identify the most effective pathways for consumers, particularly vulnerable consumers, to engage with the retail energy market. The aim of this project will be to ensure that consumers can access the best deals available for their individual circumstances.

Projects to be delivered under the objective of Equal Access

Accessibility issues for consumers e.g. relocation of prepayment meters

Delivery of this project would see improved and enhanced access to services for all consumer groups.

Review equality of access for customers who have no access to a bank account and or no internet access

This project would review the current services and mechanisms available to those consumers who do not have access to a bank account and no or limited access to the internet. This lack of access has the potential to act as a significant barrier to full engagement with the retail market for Northern Ireland.

Projects to be delivered under the objectives of Empowerment

Tenants' rights in relation to utility services

This project would seek to ensure that tenants are better informed of their rights and responsibilities in regards to utility services in Northern Ireland.

Performance metrics and reporting on vulnerable consumer protection measures across regulated companies

This project would follow on from the 'Best Practice approaches by regulated companies' project which has been proposed for delivery during years 1 and 2 of the CPP. The gathering of performance metric data, once best practice has been established, will ensure that companies are performing adequately and delivering the outcomes required under a best practice model for consumer protection in Northern Ireland.

Consultation Question

We ask that consultees respond to the following question:

Q5: Further to the previous consultation questions, do respondents have any general comments on the overall proposed CPP? Please provide evidence to support your answer.

Conclusions and Next Steps

This paper has detailed the steps the UR is undertaking to ensure the adequate protection for consumers, particularly vulnerable customers, in Northern Ireland.

This consultation is a crucial exercise in shaping the direction of regulation in relation to domestic consumer protection in Northern Ireland. The UR has also published separate decisions in regards to measures designed to enhance the market functions and information for non-domestic customers.

The responses received to this consultation will inform the UR's review of the existing CPS, and provide an evidence base for defining a positive and prioritised CPP for inclusion in the new UR Corporate Strategy (2019-24).

The UR plans to integrate the learning and best practice approaches evidenced in GB into the development of the revised and refocused 3 year CPP. While we have proposed a 3 year CPP it will be a rolling programme and as such will be able to grow and respond to changing consumer circumstances and priorities as they arise throughout the 5 year of UR's Corporate Strategy. It is our intention to review the CPP at the end of the 3 year delivery period.

Next Steps

The consultation period will close at **3pm on Friday 7th December 2018**.

Responses to this consultation should be forwarded to reach the Utility Regulator on or before **3pm Friday 7th December 2018** to:

Meadhbh Patterson
The Utility Regulator
Queens House
14 Queen Street

Belfast

BT1 6ED

Email: Meadhbh.Patterson@uregni.gov.uk

Your response to this consultation may be made public by the UR. If you do not wish your response or name made public, please state this clearly by marking the response as confidential. Any confidentiality disclaimer that is automatically produced by an organisation's IT system or is included as a general statement in your fax or coversheet will be taken to apply only to information in your response for which confidentiality has been specifically requested.

Information provided in response to this consultation, including personal information may be subject to publication or disclosure in accordance with the access to information regimes; these are primarily the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 1998 (DPA). If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Authority.

This document is available in accessible formats.

Please contact Meadhbh Patterson (Meadhbh.Patterson@uregni.gov.uk).