



Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

11 February 2021

Dear Nicola,

Thank you for the opportunity to respond to the Utility Regulator's consultation on the marketing code of practice.

Bright is the newest electricity supplier in the NI electricity market, having entered the market in November 2020. Bright offers 100% renewable electricity, one simple tariff and no exit fees, we believe in keeping things simple for our customers.

We welcome the UR's proposed changes to the marketing CoP which we consider will provide consumers with a useful tool for comparison to understand which tariffs offer them the greatest value for money. It is right that the UR should reflect the current levels of competition and potential levels of confusion for customers, particularly caused by the number of tariffs available, by creating a structure to provide a coherent and consistent comparison tool among suppliers.

Comments on proposed amendments

We would wish to make the following comments in relation to the changes proposed to the marketing code of practice.

Time of Use Tariffs

We would request that UR includes a mechanism for comparing time of use tariffs, including Economy 7 tariffs. There has been a significant focus from both the UR and the Department for the Economy to shift consumers energy use away from peak times and therefore reduce dependence on traditional, and potentially more environmentally harmful, forms of generation. Alongside this there is an increasing use of electric vehicles, which brings an increasing demand for time of use tariffs. It would seem appropriate that a mechanism for comparing these tariffs is also included.

We note that the Consumer Council currently compares Economy 7 tariffs on their website. We consider that it should be possible to provide a standard profile of usage for time of use tariffs to ensure that an estimated annual bill is calculated in a consistent manner.

Use of EAB in marketing

It would be useful for the UR to be prescriptive on the level of information it requires is provided alongside an estimated annual bill, and the format of such information. We consider that it is important for this detail to be provided to ensure a level playing field for all suppliers. For example, on marketing literature can this information be provided in a footnote or point to further information available on the website.

In particular, for social media posts where suppliers wish to include the EAB, it must be clear to suppliers what information should also be posted, taking into consideration that social media posts are often severely limited in their content.

We would ask UR to consider how the information would be best presented and include instruction on this matter within the CoP.

We look forward to reviewing the UR's decision on the matter in due course.

Kind Regards

Lesley Robinson

Lesley Robinson
Regulatory Affairs Manager