

Nicola Parker
The Utility Regulator
14 Queen Street
Belfast
BT1 6ED
11 February 2021

Dear Nicola,

Review of the Prohibition of the use of Annual Bill or Annual Cost for Quotations or Comparison in the Domestic Marketing Code of Practice, January 2021

Firmus energy (Supply) Limited has engaged extensively with the Utility Regulator (UR) in relation to consumer protection initiatives including the various versions of the Marketing Codes of Practice and welcomes the opportunity to provide further feedback on this proposed modification.

As a supplier of natural gas across multiple network areas in Northern Ireland, firmus energy is uniquely placed as both the commissioning supplier in the Ten Towns network area and a competing supplier in Greater Belfast. Our marketing and sales processes have been developed to meet the standards set in the Codes of Practice and with our customers in mind. Any decision by the UR to update this Code of Practice should be made with the aim of improving the experience for the customer, leading to transparent and concise price comparisons for all.

All firmus energy domestic tariff information is available to the public on our website and via our customer facing teams, we encourage potential customers to fully understand the composition of their natural gas bill so they can make an informed decision around choosing a supplier. We take particular care when discussing the discounts available including the terms and the customer's obligations to provide meter reads etc. Domestic customer discounts relating to Direct Debit payment and Online Account management are shown in tariff materials as monetary amounts applied to the customer bill - separate from the pence per kWh that customers use to compare prices. In order for a potential customer to best understand a true comparison between suppliers, an annual estimate of costs including all aspects of the bill should be permitted. Independent comparison calculators have previously excluded monetary discounts from their calculations, therefore misleading potential customers on the best tariff option. Firmus energy welcomes this modification to the Code of Practice allowing suppliers to provide a more reflective estimate of annual costs directly to potential customers, encouraging them to make an informed choice for their energy supply.

It should however be noted that natural gas customers in Northern Ireland are still relatively inexperienced with switching, compared to electricity and therefore need additional measures in place to ensure they are aware of the best deal available to them. When comparisons with other supplier offerings are conducted, the detail of these comparisons should be made available to the customer to encourage transparency. We believe the additional measures listed in the draft Code of Practice will prevent misleading information being presented to the customer.

We look forward to continued engagement with the UR and wider industry stakeholders on this and many other consumer protection measures.

Kind regards,

Áine Ní Cheara
Regulatory Affairs | firmus energy