



Clodagh Goodman
Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

18 December 2023

Re: Notice under Article 14(2) of the Electricity (NI) Order 1992 for the Power NI Electricity Supply Licence

Dear Clodagh,

Thank you for the opportunity to respond to this Article 14(2) notice in respect of the proposed modifications to Power NI's electricity supply licence.

The Consumer Council

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.

The Consumer Council has specific statutory duties in relation to energy, postal services, transport, and water and sewerage. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

Licence Modifications

The Consumer Council recognise that UK Government did not fund the costs incurred by electricity suppliers to administer the Energy Bill Support Scheme (EBSS) which provided much needed support to consumers at a time of exceptionally high energy prices last winter.

The implication of this Government decision not to cover supplier's administration costs is that, Northern Ireland electricity suppliers will recover those costs through customer tariffs.

Therefore, it is important that the Power NI regulated tariff also appropriately reflects the costs to administer the provision and delivery of EBSS payments. Not doing so could negatively impact competition between suppliers as the regulated tariff would be artificially lower than all other available tariffs in the Northern Ireland supply market.

However, it is essential that the Utility Regulator undertakes a thorough review of Power NI's costs relating to the administration of the EBSS schemes. This is important to ensure Power NI are only permitted to recover reasonable, efficient, and appropriately apportioned costs relating to the provision of the EBSS schemes to customers on the regulated tariff.

In the pursuit of transparency and consumer trust, it is important that the Utility Regulator and Power NI provide the Consumer Council the breakdown of the costs of administering the EBSS schemes as part of the next Power NI Tariff Review. This will enable consumers to have justified confidence that Power NI's administration of the scheme was reasonable and has been assessed as such, by both the Utility Regulator and the Consumer Council.

The Consumer Council would like to reaffirm our commitment to collaboration with the UR and other key stakeholders so that Northern Ireland energy systems work in the best interest of local consumers.

Yours sincerely,



Raymond Gormley
Head of Energy Policy