



Energy Supplier Customer Service Levels

Consultation Paper
March 2024

About the Utility Regulator

The Utility Regulator is the economic regulator for electricity, gas and water in Northern Ireland. We are the only multi-sectoral economic regulator in the UK covering both energy and water.

We are an independent non-ministerial government department and our main duty is to promote and protect the short-and long-term interests of consumers.

Our role is to 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.

We are based at Queens House in Belfast. The Chief Executive and two Executive Directors lead teams in each of the main functional areas in the organisation: CEO Office; Price Controls, Networks and Energy Futures; and Markets and Consumer Protection.



Our mission

To protect the short- and long-term interests of consumers of electricity, gas and water.



Our vision

To ensure value and sustainability in energy and water.



Our values

- Be a best practice regulator: transparent, consistent, proportionate, accountable and targeted.
- Be professional – listening, explaining and acting with integrity.
- Be a collaborative, co-operative and learning team.
- Be motivated and empowered to make a difference.

Abstract

This consultation seeks stakeholders' views on the proposals set out in this paper, in relation to mandatory requirements for energy supplier customer service levels for domestic customers across the four areas outlined below:

- a) Consumers in vulnerable circumstances;
- b) Customer contact centre services (this includes call centres and all mediums of written contact with consumers including social media platforms and emails);
- c) Setting fixed direct debits (at a set amount each month); and
- d) Returning of customer credit that has accrued on the customer account.

Audience

This document is likely to be of interest to regulated energy supply companies, gas and electricity consumers and consumer representative bodies.

Consumer impact

This project was established to remedy issues of some supplier failings impacting a significant number of consumers. The completion of the project will require consistent good practice across all Suppliers and therefore increase protection and improve the standards of service that domestic customers receive from their energy supplier in key customer service areas. This includes consumers in vulnerable circumstances, customer contact centre services, processes for fixed direct debits and processes for the return of customer credit.

Contents page

	Executive Summary	1
1.	Introduction	7
2.	Background	9
	Customer contact centre services	10
	Fixed direct debits	13
	Return of customer credit	15
	Update since the Guidance Note was issued	16
3.	Proposals for consultation	19
	Consumers in vulnerable circumstances	20
	Customer contact centre services	26
	Supplier processes for setting fixed direct debits.....	39
	Supplier processes for return of customer credit	43
4.	Proposed approach for implementation, monitoring and reporting	46
5.	Equality considerations	48
6.	Next steps	49
7.	Annex	50
	Glossary	50

Executive Summary

Introduction

The Utility Regulator (UR) operates to ensure consumers are properly protected in Northern Ireland gas and electricity markets. We do this by promoting effective competition and through regulation if competition is not effectively protecting consumers.

We were made aware, via consumer complaints and stakeholder concerns, about potential failings in some supplier customer service levels in 2022. The issues related to three key areas; customer contact centre services, processes for setting fixed direct debits and the return of credit that had accrued on customer accounts. These identified issues related to customer service levels for domestic consumers only and we have not been made aware of any issues with service level provision for non-domestic consumers.

Background

Following some consumer complaints and stakeholder concerns, we instigated a review of supplier performance in each area highlighted above. We identified that, for a number of suppliers, delivery of these services had fallen below what we would consider to be an acceptable level to ensure consumers are protected. In addition, we established that there are gaps in our regulatory framework in the related areas.

Customer contact centre services

We reviewed supplier contact centre performance by analysing their data submissions on Key Performance Indicators (KPIs). We also engaged with consumer representative bodies. The metrics showed that a number of suppliers' contact centre performance had fallen below what we would consider to be an acceptable standard, this included issues such as high average call wait times, concerning call abandonment rates and an inadequate number of call handlers being employed to provide an adequate level of service.

Fixed direct debits

We commissioned Gemserv to review how suppliers set and review fixed direct debits. This review reported that all suppliers appeared to meet the basic requirements of the current licence conditions. However, they noted significant variances across suppliers that would directly impact the customer experience. These included variations in customer communications when a change in a fixed direct debit payment is implemented, the frequency of reviews of fixed direct debit amounts and the supplier triggers to initiate a review of a customer's fixed direct

debit amount.

Return of customer credit

Gemserv also identified issues with the process of refunding customer credit with some customers having to proactively request a return of credit, some suppliers not providing customers with the option to have their credit returned, and some suppliers taking an unreasonable length of time to return credit to customers. In addition, the findings included high credit balances as a result of high fixed direct debit amounts that were significantly greater than customer usage.

Following our review, we issued a Guidance Note in September 2023 for energy suppliers¹. This set out our expectations in each of these areas to rectify the issues. We encouraged all suppliers to review and implement our recommended guidance to drive improvements in their customer contact centre services. We also informed stakeholders that we would consult on mandatory requirements.

Supplier progress since the Guidance Note was issued

Our constructive engagement with suppliers and consumer representative bodies on the implementation of the guidance, coupled with consideration of Ofgem's approach² to improving consumer service standards in Great Britain (GB), has helped to inform our proposed mandatory requirements. This now includes additional proposed mandatory requirements for consumers in vulnerable circumstances that were not part of the Guidance Note. It is important to highlight that these requirements are specifically in relation to customer contact centre services and are within the wider context set out in the Best Practice Framework (BPF)³: Code of Practice for Consumers in Vulnerable Circumstances.

Proposals for consultation

We outline below the proposed mandatory requirements in the four areas to improve the standards of service provided by energy suppliers to all domestic consumers. Full details of these requirements are included in section 3.

a) Consumers in vulnerable circumstances. We have proposed three mandatory requirements which are:

1.	Domestic consumers, in particular those in vulnerable circumstances must be able to easily identify a method of contacting their energy
----	--

¹ [Guidance Note – Energy Supplier Customer Service levels \(September 2023\).](#)

² [Consumer standards decision | Ofgem](#)

³ UR's Best Practice Framework Consultation Proposals: Code of Practice for Consumers in Vulnerable Circumstances published on 22 June 2023. [Best Practice Framework Consultation Proposals: Code of Practice for Consumers in Vulnerable Circumstances | Utility Regulator \(uregni.gov.uk\)](#)

	supplier that meets their needs. The effectiveness of these methods must be regularly reviewed by suppliers.
2.	Suppliers must have processes in place to identify and prioritise enquiries from domestic consumers in vulnerable circumstances who may require immediate assistance, or representatives acting on their behalf and in their interest. This should include adequate training to ensure these processes are being followed sufficiently (discussed under requirement 6 in customer contact centre services).
3.	Suppliers must implement appropriate processes/services to provide a freephone telephone number for domestic consumers that are in vulnerable circumstances. Eligible customers must be made aware of and directed to free methods of contact as soon as their supplier is aware of their eligibility.

b) Customer contact centre services. We have proposed 11 mandatory requirements which are:

1.	At an overall level, suppliers must ensure they have and maintain robust internal capability, systems and processes to enable them to adequately deliver their customer contact centre services.
2.	Customers must be able to easily identify methods of contacting their suppliers.
3.	Suppliers must ensure customer contact centre services are open at times that meet the needs of their domestic customers.
4.	Consumers must be able to reach their supplier's customer contact centre easily without experiencing an excessive call wait time to speak to an operative (not over an average wait time of four minutes).
5.	Suppliers to implement a triage system for all calls.
6.	Customer contact centre operatives must be adequately trained to ensure they can provide accurate and consistent information to consumers.
7.	Call back services must be offered by all suppliers and acted upon in no more than 24 hours ⁴ .

⁴ Taking account of supplier customer contact centre opening hours.

8.	Suppliers must ensure that their call abandonment rate is not excessive (not above 12.5%).
9.	A customer's call must never be disconnected when they contact their supplier during their customer contact centre operating hours (apart from circumstances outside of the supplier's control).
10.	Written customer contacts (all mediums of written contact with consumers including webchat, social media platforms and emails) must receive timely responses within a maximum of 24 hours ⁵ .
11.	Suppliers must implement a triage system for written contacts.

c) Setting fixed direct debits. We have proposed three mandatory requirements.

1.	Suppliers must take all reasonable steps to ensure that when setting the fixed direct debit for a new customer, it is based on the best and most accurate usage information: the fixed direct debit value must be calculated specific to the individual customer and based on up-to-date and accurate information.
2.	For any fixed direct debit payment plan (new and amended), suppliers must provide clear and accessible information to the consumer on how this payment plan operates.
3.	Reviewing the fixed direct debit - the fixed direct debit review must be conducted on a regular basis at set regular intervals (a minimum of six months) and the value must be based on up-to-date accurate information.

d) Return of customer credit. We have proposed one mandatory requirement.

1.	Customer credit – customers on a fixed direct debit must not have excessive credit on their account and any accrued customer credit must be easily obtained from their supplier.
----	--

⁵ Taking account of supplier customer contact centre opening hours.

Proposed approach for implementation, monitoring and reporting

Implementation

We propose that the requirements for consumers in vulnerable circumstances and customer contact centre services will be implemented through a new mandatory Code of Practice on Customer Service. This new Code of Practice will become a new licence requirement in the electricity and gas supply licences for those supplying domestic customers and as such suppliers will be required to comply with the licence obligation and the requirements set out in the associated new Code of Practice.

This new Code of Practice on Customer Service will complement the existing suite of Codes of Practice that are included in the supply licence including the forthcoming new Code of Practice for Vulnerable Consumers.

We propose that the requirements for (i) supplier processes for setting fixed direct debits and (ii) requirements for supplier processes for return of customer credit are directly included in the supply licence as a new or amended licence condition.

The new licence conditions and/or amended licence conditions will require a 28-day statutory consultation. We will publish the statutory consultation notice on the proposed licence condition(s) when publishing our final decision paper on the mandatory regulatory requirements, alongside the accompanying Code of Practice on Customer Service.

Monitoring and reporting

Suppliers will be asked to confirm their compliance with the new/modified licence conditions through the annual Statement of Licence Compliance which is submitted each February for the preceding calendar year. This return confirms compliance or highlights any areas of non-compliance (including compliance proformas) with each supply licence condition for the reporting period. The Statement of Licence Compliance submission is accompanied by a letter of assurance, signed by the Chief Executive Officer or Managing Director of the supplier. Suppliers are expected to inform UR of any areas of non-compliance or risk of non-compliance as soon as they are aware of them (throughout the reporting period) and to provide detail to the UR of the remedial action being taken to address compliance issues.

In addition, we are proposing that we will monitor the Code of Practice via a retrospective annual submission (details of this will be included in the final decision paper).

If we identify supplier non-compliance with the new licence conditions, licence modifications or the new Code of Practice, we will investigate the potential licence

breach pursuant to our Enforcement Policy⁶.

Alongside monitoring licence conditions and the new Code of Practice, we will continue to monitor supplier customer contact centre KPIs and if we identify any areas of concern we will investigate with the supplier. UR may decide at a future point that other reporting metrics are required to assist with the monitoring of the new Code of Practice.

Further details on the implementation timelines and monitoring of compliance with the licence conditions and the Code of Practice, will be included in the final decision paper.

Next steps

We welcome comments from all stakeholders on these proposals by 5pm on 28 May 2024. Please provide rationale and evidence to support your view. Please send responses to Michael.Legg@uregni.gov.uk.

We expect to publish the decision paper on the mandatory regulatory requirements, the accompanying Code of Practice on Customer Service and the relevant licence modifications later in 2024.

⁶ [UR Updated Enforcement Procedure - \(uregni.gov.uk\)](#)

1. Introduction

- 1.1 Protecting consumers is at the heart of the Utility Regulator's (UR) role and we pursue this, where appropriate, through promoting effective competition in the Northern Ireland energy markets. UR operates to ensure consumers are adequately protected in these markets through competition, alongside regulation if that competition is not deemed effective enough to adequately protect consumers.
- 1.2 UR's current Consumer Protection Programme (CPP)⁷ plays a pivotal role in ensuring Northern Ireland domestic consumers are protected. The CPP is a central element of UR's Corporate Strategy and is our principal vehicle to deliver positive outcomes for domestic electricity, gas and water consumers in Northern Ireland. The current programme includes a suite of bespoke projects aimed at enhancing consumer protection for all domestic consumers. Following consultation, the new CPP for the period 2024 to 2029 is currently being finalised and will be launched in advance of April 2024.
- 1.3 The impact of Covid-19, volatile energy prices, the cost-of-living crisis and delivery of the UK Government Energy Support Schemes⁸, placed increased pressure and resource demands on suppliers' customer services. Yet it is for these reasons that it is more important than ever that consumers receive adequate and fit for purpose customer services from their supplier.
- 1.4 As a result of a rising number of complaints and concerning reports regarding customer service levels in Quarter 4 (Q4) 2022, UR conducted a review of supplier performance in this area. This was carried out by analysing suppliers' data submissions, reviewing consumer queries and engaging with consumer representative bodies. The review highlighted a number of potential failings in some suppliers' customer service levels. We also appointed Gemserv to undertake a high-level review of how suppliers set and review customer's fixed direct debits (undertaken during Q4 2022). This was a fact-finding endeavour to understand suppliers' terms and conditions in relation to fixed direct debits, the systems and processes used in setting fixed direct debit amounts and for returning credit for customers.
- 1.5 In September 2023 we published Guidance Note 'Energy Supplier Customer Service Levels: Contact centres and suppliers' processes for setting of fixed direct debits and return of credit'⁹. This Guidance Note set out a number of minimum standards expected from suppliers in order to deliver efficient and effective customer contact centre services, fixed direct debit offerings for their customers and consistent processes for returning of customer credit

⁷ <https://www.uregni.gov.uk/files/uregni/documents/2021-12/consumer-protection-plan-review.pdf>

⁸ <https://www.gov.uk/get-help-energy-bills/northern-ireland>

⁹ [Guidance Note – Energy Supplier Customer Service Levels | Utility Regulator \(uregni.gov.uk\)](#)

that has accrued on the customer account.

- 1.6 At this time, we stated that the Guidance Note had been issued in advance of a formal consultation to help deliver improvements, and as the first step in the process of implementing mandatory requirements for suppliers.
- 1.7 This consultation seeks stakeholders' views on the proposals set out in this paper in relation to mandatory requirements for Energy Supplier Customer Service Levels across the four areas outlined below:
 - a) Consumers in vulnerable circumstances;
 - b) Customer contact centre services¹⁰ (this includes call centres and all mediums of written contact with consumers including webchat, social media platforms and emails);
 - c) Setting fixed direct debits (at a set amount each month); and
 - d) Returning of customer credit that has accrued on the customer account.
- 1.8 The specific consideration of the area of 'consumers in vulnerable circumstances' is additional to the three areas which were covered in the Guidance Note. This is discussed further in section 3.

¹⁰ For this paper we define customer contact centre as suppliers' call centres that are used for customers to contact the supplier and replies to the customer contact email address that suppliers provide to customers as well as webchat and social media platforms.

2. Background

- 2.1 In Q4 2022, UR was made aware of a rising number of complaints and concerning reports regarding some Northern Ireland suppliers' customer service levels, specifically in the areas of customer contact centre services, the setting of fixed direct debits and the processes for the return of customer credit.
- 2.2 These identified issues related to customer service levels for domestic consumers only. We have not been made aware of any issues with the service levels for non-domestic consumers and have no evidence (anecdotal or otherwise) that services to non-domestic customers have declined or were at an unacceptable standard. Depending on size, customer service provision for non-domestic customers is set up in a way that a team (allocated to specific sectors for example) will manage those accounts, or an individual member of staff will be the account manager for a larger customer. In this context, it should be easier for a non-domestic customer to contact their supplier.
- 2.3 We conducted a review of supplier performance in these areas. This was carried out by analysing suppliers' data submissions for their customer contact centre performance, reviewing customer queries, engaging with consumer bodies and appointing Gemserv to carry out a high-level review of how suppliers set and review fixed direct debits.
- 2.4 During this review, a number of potential failings in some suppliers' customer service levels were identified. To support this work, we then identified and reviewed examples of good practice (from Northern Ireland utilities and regulated industries across other jurisdictions) to develop guidance for energy suppliers on our expectations on customer service levels to drive improvements.
- 2.5 From November 2022 we have been monitoring suppliers' customer contact centre performance on a monthly basis. Analysis of the submissions from suppliers offered important insight into market wide customer contact centre performance and provided further context to the reports we had received from individual customers and consumer representative bodies.
- 2.6 To address these issues, in March 2023 we issued an open letter¹¹ to all domestic gas and electricity suppliers, setting out our concerns in relation to the performance of their customer contact centres. We also held two roundtable meetings with all domestic suppliers and consumer representative bodies to discuss the issues and options for resolution.

¹¹ [Supplier open letter from CEO ref Call Centre Issues \(uregni.gov.uk\)](#)

2.7 In September 2023 we published a Guidance Note for domestic energy suppliers to set out our expectations on customer service levels in three areas:

- Customer contact centre services;
- Processes for setting fixed direct debits (at a set amount each month); and
- Returning of customer credit that has accrued on the customer account.

2.8 In developing the guidance, we reviewed best practice examples in the delivery of customer contact centre services that meet customer needs, fixed direct debit setting and processes for the return of customer credit. This included Northern Ireland utilities and regulated industries across other jurisdictions. We also engaged with Northern Ireland consumer representative bodies on our proposed guidance to obtain their input and views as to whether it would address their identified issues.

2.9 On publication of the guidance, we committed to the development of a consultation on mandatory requirements to strengthen our regulatory framework in customer service levels, fixed direct debits and return of customer credit. The aim of this being to improve the standards of service provided by energy suppliers for all consumers over the longer term, including those in vulnerable circumstances.

2.10 The issues identified and reported upon in the Guidance Note are set out per area below:

Customer contact centre services

Background:

2.11 Energy supply is an essential service. Therefore, it is important that suppliers have effective customer contact centre services so that their customers can easily reach them to get any support they need. In addition, energy suppliers must operate an accessible complaints procedure¹² in order to allow customers to bring (and have promptly dealt with) any complaint in relation to supply.

2.12 Issues such as volatile energy prices and public uncertainty surrounding government support schemes in 2023 likely led to an increase in consumers

¹² Electricity Licence Condition 33: Code of Practice on Complaints Handling Procedure. Gas Supply Licence Condition 2.8: Code of Practice on Complaints Handling Procedure

attempting to contact their suppliers. It is precisely during uncertain times that these customer contact centre services play their most vital role.

2.13 Suppliers represent the consumer-facing element of the energy market, and it is our expectation that they make it easy for consumers to contact them and ensure that their customer service arrangements are fit for purpose. To achieve this, we expect suppliers to allocate and maintain such levels of resources as may reasonably be required to enable them to receive, handle and process all consumer contacts in an efficient and timely manner.

2.14 As highlighted previously, to gain further understanding of the performance of suppliers' customer contact centres, we asked all domestic suppliers to provide a breakdown of the following Key Performance Indicators (KPIs) for the period 01 November 2021 – 31 October 2022¹³:

- Service level (% of calls answered within 30 seconds).
- Average call handling time;
- Abandonment rate (number of customers who end their call before it is answered by the supplier's customer contact centre);
- Average call wait times;
- Total number of calls;
- Average number of Full Time Equivalent (FTE) customer service agents taking calls; and
- Number of domestic customers.

2.15 Analysis of the submissions from suppliers offered an important insight into market wide customer contact centre performance and provided further context to the reports we had received from individual customers and consumer representative bodies.

Issue:

2.16 Our initial review from our analysis of customer contact centre statistics, evidence from complaints we have received and information from consumer representative bodies, gave rise to the following concerns with some suppliers' customer contact centre services:

- Long average call wait times;

¹³ We issued a subsequent request in January 2023 for suppliers to continue to send monthly reports of the KPIs to allow further monitoring.

- High rates of call abandonment;
- Suppliers not adequately resourcing their call centres to cope with increases in call volumes and effectively serve their customers;
- Customers being disconnected from the call before they can get through to the contact centre;
- Email correspondence receiving no response (or exceedingly long delays);
- Some suppliers offering call back services, but customers not receiving a call back; and
- Customers' issues not being resolved when they got through to their supplier, with instances of customers receiving different information each time they contacted their supplier.

Current situation:

- 2.17 Since April 2023 overall performance has improved for most suppliers. However, even with this improvement, some suppliers are still not meeting the expectations outlined in the Guidance Note specifically, abandonment rate of under 12.5% and average call wait times of under five minutes. At the joint supplier and consumer group meeting which we held in March 2023 on suppliers' customer contact centre performance, it was noted by suppliers that the total number of calls suppliers were receiving had been dropping. This drop in call volume was explained, in part, due to the end of some of the UK Government Energy Support Schemes.
- 2.18 As highlighted above, although some improvements have been made with suppliers' customer contact centre performance, we want to ensure that the issues experienced do not reoccur. Whilst the issue of the Guidance Note was an expedient way to communicate publicly on the level of customer contact centre service we expect from suppliers, this consultation on mandatory requirements will build on those expectations and will have a long-term direct and positive impact on consumers.
- 2.19 The importance of this is further highlighted when reviewing contact centre performance at an aggregated level from September 2023 to January 2024, which shows an increase in the average wait time and an increase in the % abandonment rate from April 2023 to August 2023. At this aggregated level, abandonment rate of under 12.5% and an average call wait time of under five minutes were not achieved over this period.
- 2.20 It is vital that consumers receive a better quality of service from all suppliers throughout the year. For instance, analysis of supplier submissions for

January 2024 shows that across the market on average just over half (54%) of calls were answered within 30 seconds; the average abandonment rate of two suppliers was above what we expect; and the average call wait time of two suppliers was over five minutes. This underlines the need for regulatory consumer protection requirements in this area to deliver further improvements and to ensure consumers receive an adequate and consistent level of service throughout the year.

Fixed direct debits¹⁴

Background:

- 2.21 Many suppliers offer their customers the option to pay their energy bills through fixed direct debit payments (often on a monthly basis). The amount of fixed direct debit that is paid by the customer is usually agreed at the beginning of the contract, and is based on the customer's expected annual energy usage, which is then divided as equal payments across the year. The value of the fixed direct debit can be adjusted over the customer's contract to realign with the customer's actual usage.
- 2.22 Customers on a fixed direct debit contract can have a negative balance (be in debit) or positive balance (be in credit) with their supplier at different periods of their contract. This can occur if a customer's energy usage fluctuates over the year and/or their energy usage is different to that expected due to seasonal variations.

Issue:

- 2.23 During 2022 and early 2023, both UR and Northern Ireland consumer representative bodies experienced an increased level of contact from consumers in relation to the level of their monthly fixed direct debit payments, as well as the level of credit built up and subsequently the customer's ability to receive this credit back. Concerns were raised by consumer representative bodies to UR that some suppliers may have inconsistent processes in place in relation to the setting, review, and adjustment of fixed direct debits. These inconsistencies have been seen both across different suppliers and within some individual suppliers (with customers receiving different information each time they contact their supplier).
- 2.24 We appointed Gemserv in Q4 2022 to undertake a high-level review of how domestic gas and electricity suppliers set and review fixed direct debits. This was a fact-finding endeavour to understand suppliers' terms and conditions

¹⁴ Please note that this relates to fixed direct debit only. Variable direct debit contracts where the customer is billed different amounts each bill (based on their usage for the specific billing period) are not included.

in relation to fixed direct debits, and the systems and processes used in setting fixed direct debit amounts and returning credit for customers. The review was conducted through a series of interviews with suppliers, followed by a review of their business process documentation.

2.25 The high-level review indicated that all suppliers appeared to meet the basic requirements of the licence conditions. However, Gemserv noted significant variances across suppliers that would directly impact the consumer experience. The key findings for some suppliers from Gemserv's review include:

- Lack of customer interaction in fixed direct debit setting. With some suppliers calculating the fixed direct debit amount on usage profile only, rather than considering individual circumstances that might impact the calculation (e.g. family size, demographic, etc.).
- Lack of detailed documentation, guidance and training for staff to support the supplier processes in this area.
- Variation in customer communications when a change in a fixed direct debit payment is identified. For example, some suppliers did not provide separate communication on this and only included it in the bill. It was also identified the language used in the communication could be more 'consumer friendly', to encourage the customer to contact the supplier if they have any queries or are concerned that they might not be able to meet the payment.
- Variation in the frequency of the review of fixed direct debit amounts (ranging from three to 13 months). Gemserv recommended that a more frequent review cycle of at least every three months would be of more benefit to consumers.
- Variation in the provision of credit triggers to review fixed direct debit amounts. Gemserv noted that some suppliers did have a credit trigger, but this was set at £1,000, which they considered to be too high.
- Variation in the process of refunding credit from customer accounts. Some suppliers' processes are cumbersome and require the customer to be proactive in the request for a refund of their credit.

2.26 Our overall initial findings from the Gemserv review, evidence from complaints we have received, and information from consumer representative bodies, have given rise to the following concerns with some suppliers' processes for setting fixed direct debits:

- Setting fixed direct debits on usage profile only, with no consideration of individual customer circumstances;
- Infrequent reviews of customers fixed direct debits and in some cases credit triggers to review fixed direct debit amounts being set too high;
- Inconsistencies in communication to customers on their fixed direct debits;
- High credit balances being built up; and
- Issues with customers being able to get their credit balance refunded.

Return of customer credit

Background:

- 2.27 Credit can build on a customer's account with their supplier for a number of reasons. It could be as a result of a supplier: overestimating a customer's energy usage (when setting a fixed direct debit) due to the absence of an accurate meter reading; not performing timely reviews of credit balances; or the predicted annual energy usage used to set the fixed direct debit could be wrong.
- 2.28 Customers with a fixed direct debit contract can accumulate either credit or debit balances with their supplier at different points throughout the year. This is because a customer's energy usage generally fluctuates throughout the year. Typically, consumers use less energy during the summer resulting in a build-up of credit, which may be subsequently used in the winter when more energy is consumed.
- 2.29 As credit is a result of a customer paying more to their supplier than their energy usage, this results in a credit balance and is essentially money that a supplier owes to their customer. As a result, a customer should be able to request and receive a refund from their supplier for any credit they have on their account in a timely manner.

Issue:

- 2.30 As stated above, throughout 2022 and early 2023, UR and Northern Ireland consumer representative bodies had an increased level of contact from consumers on fixed direct debit contracts in relation to both the amount of credit that is being built up on their accounts, and difficulty in being able to obtain a return of this credit from their supplier.
- 2.31 As highlighted previously, we appointed Gemserv to undertake a high-level review of how domestic gas and electricity suppliers set and review fixed

direct debits.

- 2.32 Our initial findings from the Gemserv review, evidence from complaints we received and information from consumer representative bodies have given rise to the following concerns with some suppliers' processes for the return of customer credit:
- Customers have to be proactive in requesting a return of their credit. There is evidence that some customers are having difficulty in contacting their supplier to initiate the process. This required often multiple attempts to contact their supplier, with instances of customers receiving inconsistent information on supplier's processes each time;
 - Suppliers not providing customers with the option to have their credit returned, instead factoring the credit into a reduced fixed direct debit;
 - Suppliers taking an unreasonable length of time to return credit to customers; and
 - In some instances, the cause of high credit balances was a result of a high fixed direct debit (that was much greater than the customer usage).

Update since the Guidance Note was issued

- 2.33 As discussed previously, we issued a Guidance Note 'Energy Supplier Customer Service Levels: Contact centres and suppliers' processes for setting of fixed direct debits and return of credit' in September 2023, with the aim of improving the standards of service provided by energy suppliers for all consumers. We stated the view that if suppliers followed this guidance, it should result in the delivery of satisfactory customer contact centre performance and prevent the re-occurrence of identified issues in relation to setting fixed direct debits and the return of credit.
- 2.34 At that time, we noted that whilst the Guidance Note was not mandatory, this was the minimum level of customer service we expected from all suppliers in Northern Ireland. We encouraged suppliers to review and implement the recommended guidance as soon as practical, in advance of, and in preparation for mandatory requirements being put in place following a consultation process. We highlighted the importance of the Guidance Note to drive improvements in suppliers' customer contact centres before the winter.
- 2.35 We have engaged extensively with both suppliers and consumer representative bodies since we commenced this project.
- 2.36 In our discussions with consumer representative bodies, they highlighted a

number of further requirements which were not included in the Guidance Note. These bodies were of the view that these should be considered for the consultation and to be potentially included in any mandatory requirements which were decided on.

- 2.37 We have also undertaken further engagement with suppliers after issuing the Guidance Note. This was carried out through a series of meetings with individual suppliers. The purpose of the meetings was to establish if there were current gaps in their existing processes, and how they planned to align with the guidance, or if they considered that there were fundamental issues with any of the requirements. UR allowed a period of six weeks following the issue of the Guidance Note for suppliers to undertake this analysis. These meetings were collaborative and positive. We have considered this feedback, and where a valid rationale has been given, we have updated several of the requirements we are consulting on in this document to reflect this.
- 2.38 Ofgem (the energy regulator for GB) has also undertaken work in the area of improving consumer service standards. This was in response to evidence and feedback about suppliers' customer service during winter 2022/2023, where consumers in GB were also experiencing difficulty when contacting their supplier. Ofgem found that overall, domestic consumer satisfaction from their energy supplier decreased from 74% in Q4 2018 to 66% in Q4 2022¹⁵. They issued a decision paper in October 2023¹⁶ on new and updated rules. The objective of these new rules is to:
- Make it easier for domestic consumers to contact their supplier;
 - Help provide support for domestic consumers who are struggling with their energy bills; and
 - Compel suppliers to publish information on their customer service performance as measured by Citizens Advice.
- 2.39 We have taken into account the proposals made by Ofgem and whether they would be appropriate in a Northern Ireland context, and where we consider they are relevant, we have included these for consultation.
- 2.40 As previously discussed, we have been collecting KPIs in relation to the suppliers' customer contact centres. The Guidance Note provided anonymised information of performance across all suppliers. However, we are of the view that this information should be made available per supplier. We have informed suppliers of our intention to publish their individual KPI

¹⁵ [Consumer standards decision | Ofgem](#)

¹⁶ [Consumer standards decision | Ofgem](#)

performance on our website and we are currently working with suppliers to validate their data in advance of this publication.

3. Proposals for consultation

3.1 This section of the paper sets out the proposals for mandatory requirements in relation to:

- a) Consumers in vulnerable circumstances;
- b) Customer contact centre services¹⁷;
- c) Supplier processes for setting fixed direct debits; and
- d) Supplier processes for return of customer credit.

3.2 In addition to the three sections covered in the Guidance Note, we are consulting on mandatory requirements for consumers in vulnerable circumstances which will underpin the ethos of customer service standards for all consumers. For clarity, these requirements are specifically in relation to customer contact centre services and are in the wider context of the requirements in the Best Practice Framework (BPF)¹⁸: Code of Practice for Consumers in Vulnerable Circumstances.

3.3 The proposals for mandatory requirements, set out for consultation below, have been based on the original guidance published in September 2023 and further developed taking into consideration the feedback from suppliers, consumer representative bodies and lessons from other jurisdictions. This is with the aim of strengthening the regulatory framework for domestic consumers in the four areas.

3.4 We have categorised the requirements under each of the four areas as being one of the following:

- New requirement:

This is a requirement which was not included in the Guidance Note.

- Amended requirement:

This is a requirement based on that which was set out originally in the Guidance Note but has been updated where we have taken into account feedback from suppliers or consumer bodies (or enhancements from other jurisdictions).

¹⁷ For this paper we define customer contact centre as suppliers' call centres that are used for customers to contact the supplier and replies to the customer contact email address that suppliers provide to customers as well as webchat and social media platforms.

¹⁸ UR's Best Practice Framework Consultation Proposals: Code of Practice for Consumers in Vulnerable Circumstances published on 22 June 2023. [Best Practice Framework Consultation Proposals: Code of Practice for Consumers in Vulnerable Circumstances | Utility Regulator \(uregni.gov.uk\)](https://www.uregni.gov.uk/best-practice-framework-consultation-proposals)

- Unamended requirement:

This is a requirement where the supplier's obligation remains the same as that set out in the Guidance Note but the narrative may have been updated for clarity or to include a definition following feedback from suppliers or consumer bodies.

- 3.5 UR is keen to hear the views of interested stakeholders and invites representations on all of these proposals.

Consumers in vulnerable circumstances

- 3.6 Supporting consumers in vulnerable circumstances is the focus of UR's ongoing work in the development of the BPF: Code of Practice for Consumers in Vulnerable Circumstances. The aim of this programme is to establish best practice principles and measures which utility suppliers and distribution network operators (DNO's) in Northern Ireland across electricity, gas and water must implement to better identify, support and protect consumers in vulnerable circumstances. The BPF sets out a proposed decision to implement a new wider definition of what vulnerable means:

'A consumer is deemed vulnerable when their personal characteristics or circumstances reduce their ability to engage effectively and achieve fair outcomes. A vulnerable consumer is significantly less able to protect or represent their interests and significantly more likely to suffer detrimental impacts on their health, wellbeing or finances.'

- 3.7 During our engagement with consumer representative bodies, they advocated that specific requirements and considerations should be set out for those consumers in vulnerable circumstances. Ofgem have also set specific mandatory requirements for this group of consumers in its new consumer standards requirements¹⁹.

- 3.8 In this context, this section of the paper is specific to consumers in vulnerable circumstances and will likely overarch and interlink with the other three areas outlined below. It sets out three proposals on mandatory requirements for this group of consumers to improve energy supplier customer service levels. These proposals complement the work being undertaken through the BPF.

- 3.9 At this consultation stage, it is envisaged that the requirements for consumers in vulnerable circumstances will be included as part of a new overall Code of Practice on Customer Service. Adherence with this Code will become a licence requirement. As discussed earlier in the paper, suppliers

¹⁹ [Consumer standards decision | Ofgem](#)

currently submit customer contact centre KPIs, and these metrics will continue to be used to monitor suppliers' customer service levels. In addition, there will be further monitoring requirements of the new Code of Practice, including licence compliance, as discussed in section 4. Further detail on the proposals is set out below:

New requirement

- 1. Domestic consumers, in particular those in vulnerable circumstances, must be able to easily identify a method of contacting their energy supplier that meets their needs. The effectiveness of these methods must be regularly reviewed by suppliers.**

This means:

- Suppliers must provide a customer contact service that enables domestic customers to contact them easily. As a minimum, this service must include a range of contact methods that meet the needs of domestic customers, including the needs of those domestic consumers in vulnerable circumstances. Suppliers must also promote these contact methods to ensure awareness. To reflect the diversity of different customers' communication needs, we expect suppliers to provide a range of contact methods that reflect the needs of customers that:
 - (i) Are digitally excluded (e.g. a phonenumber).
 - (ii) Find it easier to communicate digitally (e.g. digital methods of contact).
 - (iii) Have special communication needs (e.g. customers with a visual or hearing impairment, or customers with a learning disability).

UR rationale:

Digitally excluded individuals may lack digital skills, confidence and motivation, along with having limited or no access to digital equipment and internet connectivity to access online methods of contact. Therefore, it will be crucial to provide alternative methods of contact for this group of consumers.

Customers with special communication needs such as those with a visual or hearing impairment, or those customers with a learning disability may, for example, have difficulties communicating, understanding written information such as that contained on a website, or have difficulties communicating verbally with essential service providers. In this context, we are of the view that there must be specific consideration given to customers with these characteristics.

As technology changes and methods of contacting suppliers evolves, it is important to review and monitor any contact methods that are in place to ensure that they are effective and best meet the needs of consumers. An ongoing review process will allow suppliers to tailor their approach to suit their customers' needs, including those in vulnerable circumstances.

How this could be carried out:

We would expect suppliers to regularly review the effectiveness of their contact methods, as appropriate, to ensure that the contact methods they have on offer continue to best meet their customers' needs. An example of this is a website that has the functionality to allow the use of a screen reader²⁰. This regular review may highlight gaps, and these should be actioned. Furthermore, all contact methods should be promoted to ensure awareness.

New requirement

2. Suppliers must have processes in place to identify and prioritise enquiries from domestic consumers in vulnerable circumstances who may require immediate assistance, or representatives acting on their behalf and in their interest. This should include adequate training to ensure these processes are being followed sufficiently (discussed under requirement 6 in customer contact centre services).

This means:

- Suppliers must have processes to prioritise enquiries from:
 - (i) Domestic consumers in vulnerable circumstances who, due to their circumstances or characteristics, may require immediate assistance, guidance or advice; and
 - (ii) Any representatives acting on behalf and in the interest of a domestic consumer in vulnerable circumstances who, due to their circumstances or characteristics, may require immediate assistance, guidance or advice.

UR rationale:

The ability to prioritise/triage calls was raised during engagement with consumer representative bodies. This prioritisation would give assurances that those customers who have been identified as domestic consumers who

²⁰ A screen reader is a technology that helps people who have difficulties seeing to access and interact with digital content, like websites or applications via audio or touch. The main users of screen readers are people who are blind or have very limited vision.

are in vulnerable circumstances or in need of additional support, are being given the right support at the right time. Again, this is the key focus of the ongoing UR work in the development of the BPF.

Under section 3.10, requirement 6 of this consultation, we have outlined that suppliers must provide the appropriate level of training and oversight (i.e. ongoing review of training needs and adequacy of training) for all their call operatives, to ensure they have the skills and knowledge to provide consistent and accurate information to all consumers.

By providing training on identifying vulnerability, staff will be better able to identify vulnerability from a customer's characteristics or circumstances. This approach is aligned with our work on BPF and has also been mandated by Ofgem.

By having processes in place that allow a third party to contact suppliers on behalf of a domestic consumer, this will alleviate potential stress on a consumer in circumstances such as a bereavement, illness, financial difficulty etc.

How this could be carried out:

We would expect a supplier to have a clear policy on how it will take into account a customer's circumstances and characteristics when determining who to prioritise. UR's BPF contains a definition of vulnerable and information for suppliers on consumer characteristics and circumstances.

Non-exhaustive examples of the characteristics and circumstances that could prompt a supplier to provide immediate assistance, guidance or support include:

- (i) Customers that are off-supply, or may soon be off-supply, due to the customer running out of credit on their pre-payment meters; and
- (ii) Customers whose characteristics or circumstances mean that their health could be significantly harmed if they are not provided with immediate assistance, guidance or support.

We recognise that vulnerability is transient and that an individual's characteristics or circumstances can change over time. We consider that suppliers must take this into account when seeking to identify these customers.

There are different approaches that suppliers could use to help implement this requirement and they could use a combination of these to obtain the best outcomes for customers. For example:

- (i) Suppliers could ask customers to provide information on their characteristics or circumstances, and then prioritise their enquiries accordingly. For example, suppliers could triage calls to their phonenumber based on information provided by the customer (e.g. “press 1 if you are seeking help because you are struggling to pay your bills”).
- (ii) Alternatively, suppliers could seek to use data and analytics to identify and prioritise enquiries from domestic consumers in vulnerable circumstances that may require immediate assistance, guidance or advice. For example, this could be done by prioritising enquiries from telephone numbers and/or emails linked to accounts that are on their customer care register or filtering emails to identify those that contain key words that may signal that a domestic consumer is in vulnerable circumstances and requires immediate assistance, guidance or advice (e.g. “emergency”).
- (iii) Suppliers must train agents to identify signs of vulnerability. For example, this could be through prioritising enquiries/emails where the supplier identifies relevant risk factors that may indicate that a domestic consumer is in vulnerable circumstances and requires immediate assistance, guidance or advice. Suppliers must be mindful that their customers will not always proactively indicate that they are vulnerable or self-identify as such. This aligns with high level Principle 2 in the BPF – “Consumers in vulnerable circumstances will experience tailored support and positive outcomes when interacting with utility Suppliers and DNO’s”. The measure that underpins this principle (principle 2 measure 1) is as follows: Ensure that all relevant staff (e.g. consumer facing staff, field staff, call centre handlers and sub-contractors), to include staff at a senior level, are adequately and frequently trained in the identification of consumers in vulnerable circumstances or/and who may be eligible for the customer care scheme, and in treating customers in an empathetic manner to encourage customers to self-identify. To include but not exclusive to JAM²¹ training, mental health awareness training and empathy training.

We know that many domestic consumers in vulnerable circumstances do not self-identify as being ‘vulnerable’. We would therefore expect suppliers to design any services targeted specifically at domestic consumers in vulnerable circumstances to focus more on supporting a customer’s

²¹ [Just a minute of patience | JAM Card | Autism | Hidden disability | Northern Ireland](#)

characteristics or circumstances even if they do not self-identify as being vulnerable.

We would expect suppliers to have policies and processes in place to easily facilitate a person or organisation contacting a supplier in the interest of and on behalf of a domestic consumer in vulnerable circumstances. This could include advice or welfare rights organisations (e.g. customer support and debt advice organisations), professionals such as social workers, community nurses or doctors, as well as family members or friends. Suppliers must have processes to identify and prioritise enquiries from representatives contacting them on behalf of domestic consumers in vulnerable circumstances that require immediate assistance. These processes will also need to ensure that suppliers are able to verify third parties contacting them on behalf of a domestic consumer in vulnerable circumstances. This could be achieved by a registration process, similar to the nomination service for those customers who wish to have their bills redirected to a nominated person²², where a third party is nominated.

New requirement

3. Suppliers must implement appropriate processes/services to provide a freephone telephone number for domestic consumers that are in vulnerable circumstances. Eligible customers must be made aware of and directed to free methods of contact as soon as their supplier is aware of their eligibility.

This means:

- Suppliers to provide a dedicated freephone number for domestic consumers in vulnerable circumstances.

UR rationale:

In our engagement with consumer representative bodies, concerns were raised that not all suppliers provide a freephone number option for customers.

As previously discussed, the importance of providing additional protections for domestic consumers in vulnerable circumstances is the key focus of the ongoing UR work in the development of the BPF: Code of Practice for Consumers in Vulnerable Circumstances. As part of this, in June 2023 we

²² Electricity Supply Licence. Condition 31.3 (d): Code of Practice on Provision of Services for persons who are of Pensionable Age or Disabled or Chronically Sick. Gas Supply Licence. Condition 2.11.3 (d): Code of Practice on Provision of Services for persons who are of Pensionable Age or Disabled or Chronically Sick.

consulted on measure 2.6: “All companies to provide a phone number for consumers that will not incur a premium rate charge, alongside providing other avenues for customer contact that are free of charge (to include as a minimum a call back option)”²³.

As part of their work, Ofgem have also implemented licence modifications and issued guidance in relation to providing free access for consumers that have, or will have, difficulty paying their energy bills as part of their consumer standards decision.

Given the ongoing cost of living crisis and the engagement undertaken with consumer representative bodies, we are proposing that a freephone option is offered by suppliers to eligible customers.

How this could be implemented:

There are a number of different approaches which could demonstrate alignment with this requirement including:

- (i) Dedicated freephone numbers for those consumers in vulnerable circumstances.
- (ii) Provide a freephone number for a wider range of customers or all customers. This could include domestic customers who are or will be struggling to pay their bills, those in vulnerable circumstances and those on the customer care registers. However, it would not require the supplier to identify these specific customers.
- (iii) A combination of these options.

Q1. Do respondents agree with proposals 1 to 3 set out in Section 3.9 Consumers in vulnerable circumstances?

- Please provide rationale and evidence to support your view.
- Please ensure you identify which specific requirement your response relates to.
- Include any additional requirements that could be included.

Customer contact centre services

- 3.10 This section of the paper sets out 11 proposals for consultation on mandatory requirements for customer contact centre services. Customers use these contact centre services to contact suppliers across a range of

²³ <https://www.uregni.gov.uk/news-centre/best-practice-framework-consultation-published>

channels including telephone, emails, webchat and social media. We are aware that there are requirements which complement and crossover with requirements set out in the previous section relating to consumers in vulnerable circumstances. We want to ensure that there is no ambiguity and that all customers have access to customer contact centre services which work for them. However, we recognise that there should also be specific accommodation and consideration for those consumers in vulnerable circumstances and therefore there may be reference to them in both sections.

- 3.11 At this consultation stage, it is envisaged that the requirements for customer contact centre services (along with consumers in vulnerable circumstances) will be included as part of a new overall Code of Practice on Customer Service. Adherence with this Code will become a licence requirement. As discussed earlier in the paper, suppliers currently submit customer contact centre KPIs, and these metrics will continue to be used to monitor supplier's customer service levels. In addition, there will be further monitoring requirements of the new Code of Practice, including licence compliance, as discussed in section 4. Further detail on the proposals is set out below:

Unamended requirement

1. **At an overall level, suppliers must ensure they have and maintain robust internal capability, systems and processes to enable them to adequately deliver their customer contact centre services.**

This means:

- a) Suppliers must have the appropriate systems and processes (to include premises, facilities, staff, equipment and IT systems), to enable the provision of a quality and efficient customer contact centre service to their customers.
- b) Customer contact centres and associated services must be adequately resourced to deal with all consumer contacts across a range of channels including telephone, emails, webchat and social media in a timely and efficient way.

UR rationale:

It is essential that suppliers provide customer contact centre services that work for consumers and make it easy for them to get in touch with their supplier. To do this they must have adequate resources, processes, and systems in place.

How this could be implemented:

The KPIs which are produced on a monthly basis will provide information in relation to customer service performance. Suppliers should use these to identify where there are potential gaps in service or performance issues. This could give assurance to suppliers that they do have robust internal capability, systems and processes to adequately deliver their customer contact centre services. It will also provide actionable data which will allow suppliers to make adjustments to resources, processes and systems where the data highlights either gaps in service or diminishing/poor performance below adequate levels.

New requirement

2. Customers must be able to easily identify methods of contacting their suppliers.

This means:

- a) We expect suppliers to ensure that customer enquiry service information is easy to find and prominently displayed on suppliers' websites (i.e. on, or one click away from the homepage of their website), suppliers' apps, and any written communication (e.g. on bills or statements of account) to the customer.
- b) We expect customers to be able to easily identify methods of contacting their suppliers. We expect customers to be able to easily find information on suppliers' contact methods, so that customers can choose the method that meets their needs.
- c) In particular, we would expect suppliers to consider the needs of domestic consumers in vulnerable circumstances (as set out under consumers in vulnerable circumstances section), including customers on the customer care register (e.g. customers with a visual or hearing impairment or a customer with a learning disability) when ensuring that enquiry service information is easy to find.

UR rationale:

A number of consumer representative bodies reported to us that they themselves had difficulty in finding some supplier customer contact centre telephone numbers as it was not displayed in a prominent position on their website and/or written information. This highlighted the potential problem for all consumers. If a consumer cannot easily locate their supplier's customer contact centre telephone number (or other alternative contact methods), this is a barrier to contacting their supplier, leading to inadequate service levels and poor outcomes for consumers. It is important that suppliers also place their contact number in a prominent position on written communication as well as their website, for those consumers who do not have access to the internet.

As already discussed, the importance of providing additional protections for domestic consumers in vulnerable circumstances or in need of additional support is the key focus of the ongoing UR work in the development of the BPF: Code of Practice for Consumers in Vulnerable Circumstances. This proposal closely aligns with several of the high-level principles in the BPF including principle 2 – consumers in vulnerable circumstances will experience tailored support and positive outcomes when interacting with utility suppliers and DNO's and principle 6 – consumers in vulnerable circumstances will receive relevant, timely and accessible information on the support available.

Vulnerability is multifaceted, can arise in many ways, and be transient or more permanent in nature²⁴. For example, physical illness, mental ill health, being disabled or being a family carer can lead to vulnerability. But so too can more temporary circumstances such as bereavement, a change in financial situation through, for example job loss or redundancy, or a short-term significant illness.

Identification, support and protection of consumers in the most vulnerable circumstances will become more important. The market itself, when combined with a consumer's circumstances, can also exacerbate vulnerability and put a consumer at a greater risk of detriment and lead to poor outcomes for those with increased needs. Those consumers in vulnerable circumstances may be experiencing fuel poverty, digital exclusion or higher energy costs (through lack of access to the best deals and being at home more throughout the day due to caring responsibilities). Therefore, they need specific consideration.

²⁴ [bpf-approach-paper.pdf \(uregni.gov.uk\)](https://www.uregni.gov.uk/bpf-approach-paper.pdf)

How this could be implemented:

We expect suppliers to regularly seek feedback from their customers about how to make it easy to find methods of contacting them, and to act on the feedback received. By seeking feedback from consumers on methods of contact, it will allow suppliers to tailor their approach to suit their customer's needs, including those in vulnerable circumstances.

New requirement

3. Suppliers must ensure customer contact centre services are open at times that meet the needs of their domestic customers.

This means:

- We expect suppliers to take into account the needs of their customers when setting their opening hours, including consideration of seasonality when there is likely to be higher call volumes, and an increase in email and social media contacts in winter. We would expect the supplier to be able to demonstrate how they are meeting this need.

UR rationale:

We are of the view that the ability to contact their supplier through their preferred channel of communication, and at times which are appropriate for them, is an essential requirement for customers. Introduction of this approach could also lead to calls and other contacts being spread out throughout the day if customers are offered a wider variety of opening hours.

How this could be implemented:

Suppliers must take into account the needs of customers that are unable to engage between 09:00 – 17:00 Monday to Friday for example (we understand standard opening hours may vary). For instance, by extending opening hours by two hours a day outside 09:00 – 17:00 Monday to Friday or seven hours in total over the weekend. If we observe declining or poor customer service, and their enquiry service is not open for a meaningful length of time outside this time period, we may ask a supplier to justify how their enquiry service's opening hours meet their customers' needs.

We would expect suppliers to regularly review their opening hours, as appropriate, to ensure that they are open at times that best meet their customers' needs. This must take account of seasonality, for example in winter, where there is likely to be a higher volume of calls, and an increase in email and social media contact.

Amended requirement

4. Consumers must be able to reach their supplier's customer contact centre easily without experiencing an excessive call wait time to speak to an operative (not over an average wait time of four minutes).

This means:

- Average call wait times must not be over four minutes. The average call wait time threshold will be regularly reviewed by UR and, from time to time when appropriate, may be adjusted to drive continuous improvement.

UR rationale:

In the Guidance Note, we proposed five minutes as the maximum wait time and the minimum level of service we would expect from suppliers. We have amended this requirement to a maximum wait time of four minutes.

We reviewed call wait time data and found that the three top performing suppliers average call wait time was below four minutes (between the period October 2023 – January 2024). We therefore consider this wait time to be achievable for all suppliers.

There is also evidence that the maximum average call wait time could be set lower than four minutes. In Ofcom's annual report 'Comparing customer service: mobile, landline and home broadband'²⁵ they found average call waiting times were just under two and a half minutes in 2022 for broadband and landline providers. Four minutes represents a score of two on the Citizens Advice Star rating matrix where five is excellent and one is poor²⁶. However, we are proposing that the mandatory requirement will set an expectation of a maximum wait time of four minutes.

²⁵ [Comparing customer service: mobile, landline and home broadband \(ofcom.org.uk\)](https://www.ofcom.gov.uk/consult/condocs/customer/customer220922/customer220922.pdf)

²⁶ [How the scores are worked out - Citizens Advice](https://www.citizensadvice.org.uk/citizensadvice/how-the-scores-are-worked-out/)

How this could be carried out:

The KPIs which are produced on a monthly basis will provide information in relation to customer service performance. Suppliers should use these to identify where there are potential gaps in service or performance issues. This could give assurance to suppliers that they do have robust internal capability, systems and processes to adequately deliver their customer contact centre. It will also provide actionable data which will allow suppliers to make adjustments to resources, processes and systems, where the data highlights either gaps in service or diminishing/poor performance below adequate levels.

New requirement

5. Suppliers to implement a triage system²⁷ for all calls.

This means:

- Suppliers to implement a triage system for all calls to establish urgency and prioritise calls accordingly.

UR rationale:

Following engagement with consumer representative bodies, a triage system for all contacts (including calls and written contact) was proposed as a method of identifying and prioritising more urgent contact. Through engagement with suppliers following publication of the Guidance Note, we are aware that several suppliers have already employed this method in their call centres. Ofgem have also issued guidance on prioritising those domestic customers identified as being in vulnerable circumstances, or in need of additional support and representatives acting in their interest, through use of a triage system.

This ability to prioritise calls would give assurances that those domestic customers identified as being in vulnerable circumstances, or in need of additional support, are being given the right support at the right time. Again, this is the key focus of the ongoing UR work in the development of the BPF: Code of Practice for Consumers in Vulnerable Circumstances.

²⁷ Call triage - preliminary assessment of incoming calls to determine the urgency and the priority they should be given.

How this could be implemented:

Suppliers should ensure that their systems support this. Suppliers could offer options on their recorded message system such as example, “press one if you are struggling to pay your bill”, “press two if you are on the customer care register”.

Unamended requirement

6. Customer contact centre operatives must be adequately trained to ensure they can provide accurate and consistent information to consumers.

This means:

- Suppliers must provide the appropriate level of training and oversight (i.e. initial training for new employees, ongoing review of training needs and adequacy of training, including refresher training for all employees as needed and additional training when there are any changes to internal systems and processes) for all their contact centre operatives, to ensure they have the skills and knowledge to provide consistent and accurate information to all consumers.

If a contact centre operative is unable to provide the information that the customer requires in the first instance, the supplier must have a process in place to allow redirection of the customer to another contact centre operative who can deal with the query. This must include the option for the contact centre operative to escalate the call to a specialist member of the team for more complex cases.

If customers are passed over to alternative contact centre operatives, this must be done via a ‘warm handover’ with no requirement for the customer to call back.

If a customer is not satisfied with the information provided by a contact centre operative and they consider that their issue has not been adequately resolved, then the customer must be able to escalate their issue, for example to a manager.

UR rationale:

In the Guidance Note, this requirement previously did not include an indication of what ‘adequately trained’ could mean. Stakeholders provided feedback that they wanted to understand what this would look like in terms of service provision to the consumer. We have therefore included further clarification under the requirement on what this could mean. The requirement itself has not changed from the Guidance Note. It is the responsibility of each supplier to ensure that their staff are adequately trained to ensure all aspects and appropriate levels of service are provided to the consumer.

If suppliers have processes in place allowing either calls or queries to pass to a staff member with more knowledge on the area of enquiry or alternatively an offer to call the customer back, this will ensure resolution of the issue for the customer in a timely way.

How this could be implemented:

Adequately trained could include initial training for new employees followed by regular/refresher training (as required) including new additional training when there are any changes to their internal processes. For example, the training could also cover, but not be limited to, training on identifying vulnerability, energy efficiency, any current or future UK Government Energy Support Schemes and debt.

New requirement

7. Call back services²⁸ must be offered by all suppliers and acted upon in no more than 24 hours²⁹.

This means:

- a) Suppliers must state the timeline in which the customer can expect to receive the call back. This must be no more than 24 hours from the initial contact.
- b) Suppliers must have adequate processes and resources in place to facilitate the operation of a call back facility within the timelines indicated by them.

²⁸ A call back is where the supplier provides an option for the customer to choose that the supplier will call them back (and return their call).

²⁹ Taking account of supplier customer contact centre opening hours.

- c) Suppliers must make at least three separate call back attempts if they have been unable to reach the customer. The call back attempts should be spread out across different times of the day. The contact must also be in line with the customer's preferred means of contact.

UR rationale:

In the Guidance Note, the recommended measure around call back services only applied when a supplier stated that they provided this service. We have now amended this provision to state that all suppliers must offer a call back service to their customers. Furthermore, a timeline for the call back must be indicated which must be no more than 24 hours from the initial contact.

We are of the view that providing a call back facility will help suppliers manage customer calls and meet the required targets for call wait time and lower abandonment rates. If a customer contacts their supplier's customer contact centre, they must be guaranteed a call back within a reasonable time period.

The requirement to make three attempts to call a customer back is based on best practice by a Northern Ireland advice body and therefore UR consider these expectations as reasonable to ensure adequate service levels.

How this could be implemented:

Suppliers could offer the option of a call back as part of their recorded options for example, "if you would like us to call you back, press three".

Unamended requirement

8. Suppliers must ensure that their call abandonment rate³⁰ is not excessive (not above 12.5%).

This means:

- Suppliers' call abandonment rate must not be above 12.5%. The abandonment rate threshold will be regularly reviewed by UR and, from time to time when appropriate, may be adjusted to drive continuous improvement.

³⁰ Call abandonment rate is number of customers who end their call before it is answered by the supplier's customer contact centre divided by all inbound calls including in-hours, out of hours and emergency number calls. Exclude calls for entirely automated functions (e.g. topping up/meter readings).

UR rationale:

Our review of call abandonment rate data found that one of the top performing supplier's average call abandonment rate was 11% (between the period November 2021 – January 2024). We therefore consider this figure to be achievable for all suppliers (including during the winter period). This is further supported by the data for January 2024 where five suppliers had reduced their call abandonment rate to below 12.5%.

We also note that Northern Ireland Water are achieving a much lower call abandonment rate (the latest published figures for reporting year 2021-2022 show it was 5%)³¹ and that the utility regulator for Ireland (Commission for Regulation of Utilities (CRU)) in their Price Review (PR5) for their Transmission System Operator and DNO, set call abandonment rates at 4%³². We therefore consider that 12.5% is an achievable target at this juncture for all suppliers.

How this could be implemented:

The KPIs which are produced on a monthly basis will provide information in relation to customer service performance. Suppliers should use these to identify where there are potential gaps in service or performance issues. This could give assurance to suppliers that they do have robust internal capability, systems and processes to adequately deliver their customer contact centre services. It will also provide actionable data which will allow suppliers to make adjustments to resources, processes and systems where the data highlights either gaps in service or diminishing/poor performance below adequate levels.

Unamended requirement

9. A customer's call must never be disconnected when they contact their supplier during their customer contact centre operating hours (apart from circumstances outside of the supplier's control).

This means:

- a) A customer's call must never be ended intentionally by the supplier. Examples of this include answering and immediately hanging up on the customer or calls being 'dropped'.

³¹ See NI Waters latest figures in their [Annual Information Return 2022 for Public Domain](#), found in Block C of Table 5.

³² CRU's Regulatory Framework, Incentives and Reporting Decision Paper ([CRU/20/154](#))

- b) The only exception is when it is a result of circumstances outside of the supplier's control, such as the customer's phone signal or in those instances where the customer is being abusive or threatening to the call centre operative.

UR rationale:

We have added to the exception in this requirement, because a number of suppliers highlighted that customers would only be disconnected in exceptional circumstances, such as the customer being abusive or threatening toward the call centre operative. In these circumstances, the customer would receive three warnings before disconnection. In this context, we have clarified the requirement to reflect this. The requirement remains unchanged from the Guidance Note.

How this could be implemented:

Suppliers must ensure that their customer contact centre systems do not allow for calls to be cut off even after a certain wait time. They must have processes in place that are documented, and that staff are aware of.

Amended requirement

10. Written customer contacts (all mediums of written contact with consumers including webchat, social media platforms and emails) must receive timely responses within a maximum of 24 hours³³.

This means:

- Either an answer or acknowledgement that the query is being dealt with (where further investigation is required) within 24 hours of the customer contact.

UR rationale:

The Guidance Note stipulated that written customer contacts via email should receive a timely response within five working days. This is in line with the minimum standards in our Code of Practice on Complaints Handling Procedure. The Code states, 'the timeframe in which the supplier will endeavour to resolve the complaint which shall not be longer than three months, including a prompt first answer or acknowledgement within five working days of the receipt of the complaint and the lead time to deal with a complaint'.

³³ Taking account of supplier customer contact centre opening hours.

However, through our engagement with consumer representative bodies five working days was deemed too long and that a maximum 24 hours was considered a more appropriate amount of time to answer or acknowledge the contact. We are also of the view that all social media platforms should be included in the requirement for a timely response as this medium of contact is being used by more consumers (where it is available) and as such we have updated the requirement to include this. We are of the view that this is a reasonable time frame for response.

How this could be implemented:

Suppliers should issue all customers with an automatic confirmation of receipt when they contact their supplier by email. This must include expected timelines for reply to all written contacts to manage customer expectations. Suppliers should have documented processes in place to ensure that a consistent approach is taken for acknowledgement of receipt for all consumers.

New requirement

11. Suppliers must implement a triage system³⁴ for written contacts.

This means:

- Suppliers must implement a triage system for written contacts to establish urgency and prioritise responses accordingly.

UR rationale:

After engagement with consumer representative bodies, a triage system for all contacts (including emails, social media and webchat) was highlighted as a method of identifying and prioritising more urgent contact, this is to make sure consumers receive the right support at the right time. This is similar to the proposal for a triage system for calls.

How this could be implemented:

Suppliers could use a 'keyword' search and filter process, for instance, on emails to identify customers in urgent need or use data analytics to identify and prioritise enquiries from domestic customers in vulnerable circumstances that may require immediate assistance. Written contact can include but not be limited to emails, social media contact, supplier apps and

³⁴ Written triage – preliminary assessment of incoming written contact with customer contact centres to determine the urgency and priority they should be given.

webchats.

Q2. Do respondents agree with proposals 1 to 11 set out in Section 3.11 Customer contact centre services?

- Please provide rationale and evidence to support your view.
- Please ensure you identify which specific requirement your response relates to.
- Include any additional requirements that could be included.

Supplier processes for setting fixed direct debits

- 3.12 This section of the paper sets out three proposals for consultation on mandatory requirements for supplier processes for setting fixed direct debits. At this consultation stage, it is envisaged that the requirements for supplier processes for setting fixed direct debits will be directly included in the supply licence as a new licence condition. Suppliers will be asked to confirm their compliance with the new licence conditions through the submission of the annual Statement of Licence Compliance. Further detail on the proposals is set out below:

Amended requirement

1. Suppliers must take all reasonable steps to ensure that when setting the fixed direct debit for a new customer, it is based on the best and most accurate information: the fixed direct debit value must be calculated specific to the individual customer and based on up-to-date and accurate information.

- For new customers, payments must be based on a number of factors, which includes information provided by the customer. This must, as a minimum, include the following:
 - i. Up to date meter reading;
 - ii. Size of the property;
 - iii. How many people live at the property; and
 - iv. Take account of any other relevant information provided by the customer.

UR rationale:

The Guidance Note included further requirements that should be considered when setting a fixed direct debit. During discussions with suppliers, it was highlighted, that as Northern Ireland does not currently have smart meters, the questions which had been included in the Guidance Note relating to occupation pattern of the property, type of heating and if there is any high energy use medical equipment, could not be used meaningfully to set direct debit payments. This level of detail does not have any impact due to the limited granularity on information on usage patterns which we have in Northern Ireland. However, we are of the view that relevant information on usage patterns should be taken into account as it will have an impact on the level of fixed direct debit set. In this context, we have amended the requirement to include taking account of relevant information provided by the customer.

How this could be implemented:

Suppliers should incorporate the factors noted above into whatever mechanisms and systems that are used to determine a new customer's fixed direct debit. These processes should be documented so that there is a consistent approach with all new customers.

Unamended requirement

2. For any fixed direct debit payment plan (new and amended) suppliers must provide clear and accessible information to the consumer on how this payment plan operates.

- When signing up a customer to a fixed direct debit payment plan, the supplier must clearly explain how the fixed direct debit operates. This must be clearly articulated to the customer at the point of sign up (verbally if in person or via phone or written if online) and confirmed in writing by the customer's chosen method of contact. The supplier must include the following information (as a minimum):
 - i. How the customer's fixed direct debit has been calculated;
 - ii. That the fixed direct debit value can change over the course of the contract and that it will be reviewed at regular intervals (to ensure it is reflective of customers actual usage either lower or higher);
 - iii. How and when the supplier will review the fixed direct debit;
 - iv. How and when the customer can request a review of the fixed direct debit;
 - v. How the customer can help improve the accuracy of the fixed direct debit e.g. by providing meter reads at regular intervals to ensure there is an accurate record of actual usage;
 - vi. That a fixed direct debit payment plan can result in overall account credit or debit if the energy usage is different to that expected; and
 - vii. What options the customer has if they accrue credit (to include how to request payment of their credit (see 3.13) and processes for discussing with the supplier any debt that has accrued on the account).

UR rationale:

We are of the view that there should be transparency on the setting of a fixed direct debit and that consumers should have absolute clarity as to how and why their direct debit has been set at a certain level (including new direct debits or when amendments to direct debits are made).

How this could be implemented:

Suppliers should have clearly documented processes in place to ensure consistency of approach in relation to the information which is shared with consumers with regard to the setting of their fixed direct debit (new or amended).

Amended requirement

- 3. Reviewing the fixed direct debit - the fixed direct debit review must be conducted on a regular basis at set regular intervals (a minimum of six months) and the value must be based on up-to-date accurate information.**
- a) Suppliers must conduct a regular review of fixed direct debits to ensure they accurately reflect the customer's actual energy usage. This must occur (i) at least every six months (as a minimum) or (ii) if there is a trigger such as a build-up of excess credit, or (iii) following a customer request.
 - b) Customers can submit their own meter reads to their supplier, these must be used by the supplier to review their fixed direct debits to ensure the value is based on accurate information and not estimated reads.
 - c) If a supplier changes a customer's fixed direct debit (e.g. due to a tariff change or a supplier-initiated review) the customer must receive clear, informative and timely communications on the fixed direct debit change, including the supplier's reason for the change. This communication must be sent by the customer's preferred means of contact. The communication cannot be solely through information on the face of the bill (as per requirement 2).
 - d) In addition to the six-month review, suppliers must have controls in place to identify and trigger a review when a customer has excessive credit or debit amounts accrued (further detail on what is deemed excessive is defined under supplier processes for return of customer credit).

UR rationale:

Carrying out timely reviews will help to ensure that the level of the fixed direct debit is as accurate and reflective of a customer's usage as possible. This rationale also applies to taking account of up-to-date meter readings and triggers where a consumer has excess credit on their account. The Guidance Note had stated that a regular interval was determined to be three months. However, suppliers highlighted that every three months was too frequent and would have unintended consequences for customers meaning direct debit payments could fluctuate regularly. They highlighted that the rationale for a monthly direct debit was to try to spread the cost as evenly across the year as possible, and that more frequent reviews could lead to volatile direct debit levels and cause customer confusion.

This confusion could potentially result in a higher volume of calls to the supplier. On this basis, we have amended the proposal for the mandatory requirement from a minimum regular review of three months to six months. We consider review periods of at least every six months as a timely interval to review a customer's fixed direct debit level and help spread the costs across the year. This can occur more frequently at the supplier's discretion.

How this could be implemented:

Suppliers must have both clear internal documented processes and training on how they review and calculate fixed direct debits, to ensure all staff carry these out in a clear and consistent way, complying with the new requirements.

Q3. Do respondents agree with proposals 1 to 3 set out in Section 3.12 Supplier processes for setting fixed direct debits?

- Please provide rationale and evidence to support your view.
- Please ensure you identify which specific requirement your response relates to.
- Include any additional requirements that could be included.

Supplier processes for return of customer credit

- 3.13 This section of the paper sets out the proposal for consultation on the mandatory requirement for supplier processes for return of customer credit. At this consultation stage, it is envisaged that the requirements for supplier processes for return of customer credit will be directly included in the supply licence as a new licence condition. Suppliers will be asked to confirm their compliance with the new licence conditions through the submission of the annual Statement of Licence Compliance. Further detail on the proposals for suppliers' processes for return of customer credit is set out below:

Unamended requirement

1. **Customer Credit – customers on a fixed direct debit must not have excessive credit on their account and any accrued customer credit must be easily obtained from their supplier.**
 - a) Excessive credit is defined as the monetary value in excess of an average three-month period of usage over a 12-month period (therefore taking account of seasonal usage).
 - b) Any customer in credit can, on request, receive payment of their credit in a timely manner and this must not require multiple contacts by the customer. This must take account of the latest actual meter reads and coverage of an imminent bill. The payment must be made within a maximum of 28 days from the request being made by the customer (or as soon as is practical).
 - c) Excessive customer credits must trigger a review by the supplier to ensure the customer's fixed direct debit is set at the correct level. If the customer is paying in excess of their usage, the supplier must either reduce the customer's fixed direct debit or refund the customer's credit (dependent on the customer's preferred option).

UR rationale:

During our engagement with suppliers after the publication of the Guidance Note, they asked for clarification and a definition of excessive credit as this had not been included in the Guidance Note. Under Licence Condition 27A.2(b) for electricity and 2.22.7 for gas, “where any security deposit required by the licensee shall be of an amount that is reasonable in all the circumstances of the case; and does not exceed the Charges of the Supply of Electricity/Gas likely to be applicable for an average three-month period of supply”. Therefore, we are of the view that a monetary value in excess of an average three-month period (out of 12 months of usage) is a reasonable amount to trigger a review of excessive credit on a customer's account.

The Guidance Note did not include a requirement to take account of meter reads or imminent bills. By ensuring up to date meter reads are used and account is taken of an imminent bill, this will ensure that the credit amount is correct. In terms of timing for the return of excess credit, under Licence Condition 27.4 for electricity and 2.22.4 for gas, “where a customer has demonstrated a history of timely payment over a year their security deposit must be returned as soon as is reasonably practicable or at most within 28 days”. Therefore, we are of the view that this is achievable.

How this could be implemented:

Suppliers must have both clear internal documented processes and training on how they return credit to their customers to ensure all staff carry these processes out in a clear and consistent way, complying with the new requirements.

**Q4. Do respondents agree with proposal 1 set out in Section 3.13
Supplier processes for return of customer credit?**

- Please provide rationale and evidence to support your view.
- Please ensure you identify which specific requirement your response relates to.
- Include any additional requirements that could be included.

4. Proposed approach for implementation, monitoring and reporting

4.1 This section of the paper sets out the proposed approach for the implementation of the new Code of Practice and licence conditions, including the arrangements for monitoring and reporting on the mandatory requirements across the following four areas:

- a) Consumers in vulnerable circumstances;
- b) Customer contact centre services;
- c) Supplier processes for setting fixed direct debits; and
- d) Supplier processes for return of customer credit.

Implementation

4.2 We propose that the requirements for consumers in vulnerable circumstances and customer contact centre services will be implemented through a new mandatory Code of Practice on Customer Service. This new Code of Practice will become a new licence requirement in the electricity and gas supply licences for those supplying domestic customers. As such, suppliers will be required to comply with the licence obligation and the requirements set out in the associated new Code of Practice.

4.3 This new Code of Practice on Customer Service will complement the existing suite of Codes of Practice that are included in the supply licence including the forthcoming new Code of Practice for Vulnerable Consumers.

4.4 We propose that the requirements for (i) supplier processes for setting fixed direct debits and (ii) requirements for supplier processes for return of customer credit are directly included in the supply licence as a new or amended licence condition.

4.5 The new licence conditions and/or amended licence conditions will require a 28-day statutory consultation. We will publish the statutory consultation notice on the proposed licence condition(s) when publishing our final decision paper on the mandatory regulatory requirements, alongside the accompanying Code of Practice on Customer Service.

Monitoring and reporting

4.6 Suppliers will be asked to confirm their compliance with the new/modified licence conditions through the annual Statement of Licence Compliance which is submitted each February for the preceding calendar year. This

return confirms compliance or highlights any areas of non-compliance (including compliance proformas) with each supply licence condition for the reporting period. The Statement of Licence Compliance submission is accompanied by a letter of assurance, signed by the Chief Executive Officer or Managing Director of the supplier. Suppliers are expected to inform UR of any areas of non-compliance or risk of non-compliance as soon as they are aware of them (throughout the reporting period) and to provide detail to the UR of the remedial action being taken to address compliance issues.

- 4.7 In addition, we are proposing that we will monitor the Code of Practice via a retrospective annual submission (details of this will be included in the final decision paper).
- 4.8 If we identify supplier non-compliance with the new licence conditions, licence modifications or the new Code of Practice, we will investigate the potential licence breach pursuant to our Enforcement Policy³⁵.
- 4.9 Alongside monitoring licence conditions and the new Code of Practice, we will continue to monitor supplier customer contact centre KPIs, and if we identify any areas of concern, we will investigate with the supplier. UR may decide at a future point that other reporting metrics are required to assist with the monitoring of the new Code of Practice.
- 4.10 Further details on the implementation timelines and monitoring of compliance with the licence conditions and the Code of Practice, will be included in the final decision paper.

Q5. Do you have comments on the proposed approach for implementation, monitoring and reporting as set out in Section 4?

- Please clearly detail what aspect that your comments relate to.
- Please provide rationale and evidence to support your view.

³⁵ [UR Updated Enforcement Procedure - \(uregni.gov.uk\)](http://uregni.gov.uk)

5. Equality considerations

5.1 Section 75 of the Northern Ireland Act 1998 places a number of obligations on public authorities concerning the promotion of equality of opportunity and regard to the desirability of promoting good relations between different categories. We aim to promote equality of opportunity:

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

5.2 We consider that the proposals set out in this paper for mandatory requirements help all consumers and we do not anticipate any negative impacts on any groups.

Q6. Do you agree that where this document has an impact on the groups listed, those impacts are likely to be positive in relation to equality of opportunity for utility consumers?

Q7. Do you consider that the proposals need to be refined in any way to meet the equality provisions? If so, why and how? Please provide supporting information and evidence.

6. Next steps

- 6.1 The proposed mandatory requirements detailed in this consultation aim to increase protection and improve the standards of service that all customers, including those in vulnerable circumstances, receive from their energy supplier in respect of their customer contact centre services, fixed direct debit processes and processes for the return of customer credit.
- 6.2 We welcome comments from all stakeholders on these proposals by **5pm on 28 May 2024**. Responses to this consultation should be forwarded to:

Michael Legg
Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED
Email: Michael.Legg@uregni.gov.uk

- 6.3 Once all responses to this consultation are received and analysed, we will publish the decision paper on the mandatory regulatory requirements, the new licence conditions and/or amended licence conditions, and the accompanying Code of Practice on Customer Service. We anticipate the decision paper will be published later in 2024.
- 6.4 As a public body and non-ministerial government department, UR is required to comply with the Freedom of Information Act (FOIA). The effect of FOIA may be that certain recorded information contained in consultation responses is required to be put into the public domain. Hence it is now possible that all responses made to consultations will be discoverable under FOIA, even if respondents ask us to treat responses as confidential. It is therefore important that respondents take account of this, in particular, if asking UR to treat responses as confidential, should specify why they consider the information in question should be treated as such.
- 6.5 This paper is available in alternative formats such as audio, Braille etc. If an alternative format is required, please contact our office and we will be happy to assist.

7. Annex

Glossary

BPF	Best Practice Framework
CPP	Consumer Protection Programme
CRU	Economic regulator of the energy and water sector for Ireland
DNO	Distribution Network Operator
FOIA	Freedom of Information Act
GB	Great Britain
KPIs	Key Performance Indicators
Ofcom	Economic regulator of communications services across the United Kingdom
Ofgem	Economic regulator of the energy sector in Great Britain
PR5	Price control for Ireland's network operators
UR	Utility Regulator