



SSE Airtricity

Protecting consumers during the energy transition to net zero: Call for evidence

1st March 2023

Introduction

SSE Airtricity welcomes the opportunity to respond to the call for evidence on protecting consumers during the energy transition to net zero. In our response, we have decided the most useful approach for us is to highlight our general thoughts on this topic rather than providing an answer for each individual question.

Consumer Protection through Regulation

In our view, consumer protection relating to products that will be introduced as part of the energy transition, such as smart meters and microgeneration, is something that the UR will be responsible for setting out. We feel that regulation for these products would benefit from mirroring existing frameworks, such as Codes of Practice which could naturally be extended to take account of smart services. These frameworks can provide guidance to suppliers on new requirements such as presenting data to consumers, payment transparency, and on issues such as consumer rights when switching supplier.

The Call for Evidence details that new sectors, such as heat pumps and energy efficiency measures may need included when considering consumer protection and that with more choice will come less protection. In our view, this is something that will need balanced. We do not feel that creating significant barriers to entry is conducive to innovation and could dissuade suppliers of these products from entering the market.

A factor we feel contributes to consumer protection is the level of information that is available to consumers today. Consumers are increasingly connected and are encouraged to share experiences, creating a level of collective consumer protection and naturally reducing instances of bad practice across markets. As such, as a range of new innovations are introduced, it is important that consumers comprehend the advantages and disadvantages of different technologies offered and which best suits their needs.

One Stop Shop

To maximise the benefits of energy transition in Northern Ireland, consumers will face a steep learning curve, relative to other markets. We therefore feel that consumer education is critical to improving levels of consumer protection. Consumers who are informed are empowered to make educated decisions, inherently providing increased levels of protection.

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The One Stop Shop (OSS), in our view has the potential to be the hub for consumer education, guidance and protection. We feel that this can be developed to provide informed and impartial advice, along with elements such as a trusted installers list, similar to the gas safe register for installers which is in place. This is one way in which the OSS can provide enhanced levels of protections and instil confidence in consumers.

We feel that the One Stop Shop is a prime opportunity to fill existing gaps in consumer empowerment, education, and protection. Therefore, in our view it may be more beneficial to conduct this gap analysis following the development and delivery of the OSS and the wraparound support it will provide.

Conclusion

Overall, we feel that the One Stop Shop is the vehicle through which consumer protection can be delivered. This central location serves as an opportunity to provide energy consumers with the knowledge and resources to make empowered decisions. We therefore feel that once the OSS has been delivered, we will be better able to identify any gaps in consumer protection and address these accordingly.

We look forward to further engagement on consumer protection during the energy transition and are happy to discuss any points further with the UR and CCNI.