

Response to Utility Regulator Energy Supplier Customer Service Levels 17.05.2024

Marie Curie is a leader in the provision of care and support to people at end of life. We provide a range of services including the Marie Curie hospice in Belfast. We also provide Nursing Services, Rapid Response Services and Helper Services across Northern Ireland. Each year we provide care and support for over 4,500 people living with a terminal illness, their carers and loved ones. Marie Curie also has a policy function and one of the priority areas is financial security at end of life. We produce a range of evidence and advice to inform public policy and service developments.

Terminally ill people face higher energy costs than the average household and this differential has significantly increased during the cost-of-living crisis. The symptoms of many terminal conditions make people feel the cold more or cause them pain if they do not stay warm, while others require medical equipment in the home such as respirators, dialysis machines or monitors which cannot be turned off. Following a devastating diagnosis such as motor neurone disease, a person's energy bill can rise as much as 75%- this can equate to between £600-900 per month on electricity bills.¹ These higher energy needs and the inability to easily ration energy use mean that terminally ill people are particularly vulnerable to fuel poverty and self-disconnection.² Their extreme vulnerability whilst also facing significant change to their household finances means they are at much greater risk of falling into debt or arrears. People with a terminal illness also have much less capacity to manage 'life admin' such as keeping on top of bills, checking if they are in the best tariff or even considering the benefit of informing their utility suppliers about their vulnerability.

We warmly welcome the Utility Regulator (UR) consultation on Supplier Customer Service Levels, as we did with the proposals on a code of practice for customers in vulnerable circumstances. Requiring all energy companies to adhere to minimum practices that are fair, reasonable, easy to understand and accessible is very important. We believe the proposals outlined in this consultation are of benefit to all energy consumers across NI, but would have a disproportionately positive impact on vulnerable groups or those in vulnerable circumstances, including people with a terminal illness.

Proposals re: customer contact centre services

A straightforward point of contact and easily accessible information is of critical importance to families faced with a terminal illness diagnosis. They do not have the time, mental capacity or strength to sit on a long call or make numerous calls to get the info they need. Any changes that can improve service access and quality is welcomed.

Complete and accurate customer care registers are an essential way of energy companies knowing who their most vulnerable customers are and for this information to inform the type of enhanced service response these customers should receive. Raising awareness of the customer registers should be a priority as so many of the additional supports available by energy companies rely on them knowing who their vulnerable customers are. Furthermore, the establishment of an Industry wide inter-operable customer care register, alongside customer facing training for staff such as call handlers would be of great benefit to people with a terminal illness.

Proposals: fixed direct debit and returning customer credit

We fully support the proposals around fixed direct debit and returning customer credit. A service principle of giving best value to customers is fundamental and taking as much of the onus off customers to do this themselves is welcome. Furthermore, a requirement for energy companies to alert vulnerable customers to the availability of other cheaper payment methods and tariffs should be a priority.

Whilst not a focus of this consultation, we strongly support URs plans to conduct work on how suppliers can monitor the number of PPM customers that could be self-disconnecting and what additional support can be provided.

In conclusion, Marie Curie welcomes the proposals set out in this paper. It is vital that industry invest sufficient resource to implement practices that meet these principles, and that UR has effective mechanisms in place to monitor compliance. In the broader strategic context the progressive changes being driven through these new codes of practice will support other Government policy such as the Fuel Poverty Strategy.

Thank you for the opportunity to feed into this consultation response and don't hesitate to get in touch if you would like to discuss any part of the consultation response in more detail.

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