

## **Introduction**

The Construction Employers Federation (CEF) is the certified representative body for the construction industry which employs c30,000 staff in Northern Ireland. The organisation has over 800 member companies ranging from micro businesses employing a handful of people to the largest construction companies in Northern Ireland.

In total, CEF member companies account for over 70% of construction output in Northern Ireland.

## **Response to Consultation Questions**

**Question 1. What are your views on the suitability of the scope of coverage for these measures applying to small business defined as annual consumption of 0-50MWh for small Industrial and Commercial (I&C) electricity customers and 0-73.2MWh for small I&C gas customers?**

*The current scope excludes many small to medium-sized businesses that also face challenges like lack of transparency and fair treatment. Expanding the scope to include businesses with annual electricity consumption up to 100 MWh and gas consumption up to 200 MWh would better reflect the energy needs of many smaller family businesses which may operate site offices, heavy machinery, and production equipment. This better aligns with definitions used in Great Britain and provides equitable protections.*

*The below from email dated 8/11/24 is noted also:*

*Following on from the useful discussion had at the October forum around ensuring the definition of a small business could be understood by consumers, we have amended the Small Business Charter FAQs. We have taken on board the feedback provided and have included an approximate monthly spend for a small business consumer and confirmed the percentage of connections that this charter impacts.*

*The revised FAQs can be viewed [here](#).*

**Question 2a. Should suppliers be mandated to provide transparent price information for small businesses on their website? If so, please describe what format should this take? Please provide a clear rationale to support your answer.**  
**2b. If yes, how do you suggest that this measure should be implemented? (For example, licence requirement / Code of Practice / guidance document).** **2c. Do you**

**think that this required pricing information should include standing charges, unit rates and all other associated charges per electricity meter and gas meter, which is available for a Small Business Customer to enter into a supply contract?**

*2a. Yes, transparency is critical for businesses to budget energy costs accurately. Suppliers should display detailed tariff structures, including unit rates, standing charges, and any additional fees, in a standardised format. This helps businesses compare options efficiently without needing bespoke quotes from each supplier.*

*2b. Implementation could be through a licence requirement to ensure compliance and accountability. A Code of Practice could provide detailed guidelines on how transparency should be achieved.*

*2c. Yes, businesses would welcome clarity on all components of their energy costs to forecast expenses accurately and avoid unexpected charges- including all charges ensures no hidden costs.*

**Question 3a. Should energy suppliers be required to publish information on their websites sign-posting non-domestic consumers to relevant support and advice services? Please provide reasoning to support your answer. 3b. If yes, how do you suggest that this measure should be implemented? (For example, licence requirement/ Code of Practice/ guidance document).**

*3a. Yes, signposting and clear access to support services, particularly for navigating debt, contract disputes, and energy efficiency advice would be welcome. Many small contractors lack the resources to investigate these services independently.*

*3b. This could be implemented as part of a mandatory Code of Practice. Supplier websites should have a dedicated and easily accessible section linking to relevant organisations and energy efficiency programs for businesses also.*

**Question 4a. Should non-domestic consumer bills include a standard, mandatory statement stating that the consumer may not be on the cheapest tariff and information on how to switch? Please provide a clear rationale to support your answer. 4b. If yes, how do you suggest that this measure should be implemented? (For example, licence requirement/ Code of Practice/ guidance document). 4c. Are there any other publications that you would suggest this statement be included in? Please provide a clear rationale to support your answer.**

*4a. Yes, this is essential as many overlook energy contract details amidst other priorities. Highlighting cheaper options ensures businesses reassess their contracts periodically.*

*4b. A licence requirement could mandate this inclusion on bills, ensuring it is prominently displayed.*

*4c. This statement could also be included in annual energy usage summaries and renewal notices. Clear messaging during these touchpoints would reinforce awareness and facilitate better decision-making.*

**Question 5a. Should there be a requirement for suppliers to provide nondomestic consumers with clear information around when the security deposit will be paid back to them, and require the supplier to confirm if there are alternative measures or options available other than the deposit? Please provide a clear rationale to support your answer. 5b. If yes, how do you suggest that this measure should be implemented? (For example, licence requirement/ Code of Practice/ guidance document).**

*5a. Yes, knowing when deposits will be returned is critical for financial planning. Suppliers could also explore alternatives to reduce upfront costs.*

*5b. This could be addressed through a Code of Practice.*

**Question 6a. Should notice periods under deemed contracts be prohibited? Please provide reasoning to support your answer. 6b. If yes, how do you suggest that this measure should be implemented? (For example, licence requirement/ Code of Practice/ guidance document).**

*6a. Yes, prohibiting notice periods under deemed contracts will enhance flexibility and allow businesses to switch to more competitive options without delay. This is particularly useful when projects move across different sites or regions.*

*6b. A Code of Practice or licence condition could explicitly ban notice periods for deemed contracts. Suppliers should also be required to inform customers promptly when they are placed on a deemed contract.*

**Question 7. Should the feasibility of an electricity prepayment meter solution for non-domestics be further explored? Please provide reasoning to support your answer.**

*Yes, prepayment meters could be beneficial for site offices, especially in temporary locations. Implementation should ensure that meters are user-friendly and do not disrupt operations and prepayment solutions should also accommodate the higher energy needs of certain equipment.*

**Question 8. Are there any other additional measures to enhance the operation of the non-domestic retail energy market which respondents think should be considered as part of this consultation process? 8b. If so, please describe the measure and how it could be implemented (for example CoP/ licence modification/ guidance document).**

*Potential to explore the introduction of mandatory annual energy usage reports. This would help companies benchmark their energy efficiency and explore cost-saving opportunities each year and could include all relevant information presented in one document.*