

# IMPROVING THE NON-DOMESTIC CONSUMER EXPERIENCE

Position Paper  
3<sup>rd</sup> July 2025

[www.uregni.gov.uk](http://www.uregni.gov.uk)

Utility  
Regulator 

## About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we 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 through financial and annual reporting obligations.

We are based at Millennium House in the centre of 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 and Enforcement. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.

**Utility Regulator**

**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**

**ACCOUNTABLE:**  
We take ownership of our actions.

**TRANSPARENT:**  
Ensuring trust through openness and honesty.

**COLLABORATIVE:**  
Connecting and working with others for a shared purpose.

**DILIGENT:**  
Working with care and rigour.

**RESPECTFUL:**  
Treating everyone with dignity and fairness.

## **ABSTRACT**

In 2024, Utility Regulator (UR) published its 'Review of the Regulation of the Non-Domestic Energy Retail Market' which identified key issues and concerns within the Northern Ireland non-domestic energy market. 'Improving the Non-domestic Consumer Experience' project was committed to under our Consumer Protection Programme 2024-2029 (CPP24). This project aims to remedy gaps identified in the existing non-domestic regulatory framework and ultimately improve the market for the non-domestic consumer by ensuring fair engagement and outcomes in the retail energy market. In October 2024, a consultation paper on proposed measures was published, consulting on six potential measures (and the applicable scope of these). This paper sets out UR proposals following closure of the consultation.

## **AUDIENCE**

This document is likely to be of interest to a wide range of stakeholders, including non-domestic consumers, advice and protection agencies, non-domestic representative organisations, energy suppliers and the wider energy industry.

## **CONSUMER IMPACT**

The new measures to be implemented are expected to have a positive impact on non-domestic electricity and gas consumers.

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## Executive Summary

In May 2024, Utility Regulator (UR) published a position paper following our 'Review of the Regulation of the Non-Domestic Energy Retail Market'<sup>1</sup> (the Review). As part of the Review, we undertook a programme of research and published a Call for Input<sup>2</sup> (Cfi) to gather information on the non-domestic energy market in Northern Ireland, in order to help identify any concerns and issues within the market. This helped form the basis of which projects would be included in Consumer Protection Programme 2024 – 2029<sup>3</sup> (CPP24) regarding non-domestic consumers.

'Improving the Non-domestic Consumer Experience' (CPP24 Project #23) is one of the projects we committed to under CPP24. The Review had identified several areas where non-domestic consumers were being impacted adversely and areas where there were concerns of gaps in the existing regulatory framework. Through this 'Improving the Non-domestic Consumer Experience' project, we have explored whether a range of options can mitigate these issues and help enable and empower non-domestic consumers.

Our 'Improving the Non-domestic Consumer Experience' consultation paper<sup>4</sup> was published in October 2024 and consulted on the scope of coverage applicable to non-domestic consumer protection measures and six potential modifications to the regulatory framework to enhance protections.

Our proposals are summarised below:

- The current scope of coverage for non-domestic measures will be maintained, continuing to be applied via the Small Business Consumers definition in electricity and gas supply licences, an annual consumption of 0-50 MWh for small Industrial and Commercial (I&C) electricity consumers and 0-73.2 MWh for small I&C gas consumers.
- A licence requirement will be implemented for suppliers to provide transparent price information (which includes standing charges, unit rates and all other associated charges per electricity meter and gas meter) for Small Business Consumers on their website.

<sup>1</sup> [Review of the Regulation of the Non-Domestic Energy Retail Market - Position Paper \(2024\)](#)

<sup>2</sup> [Review of the Regulation of the Non-Domestic Energy Retail Market - Call for Input \(2023\)](#)

<sup>3</sup> [CPP 2024-2029 Decision Paper](#)

<sup>4</sup> [Improving the Non-domestic Consumer Experience- Consultation on proposed measures \(2024\)](#)

- A requirement for suppliers to publish information signposting to customer support services will be introduced via a new Code of Practice (CoP): 'Non-domestic Code of Practice on minimum standards on Payment of Bills'. This work will commence in Summer 2025 and we expect a draft CoP to be consulted upon in Autumn 2025. This will be implemented via a licence modification later in the year.
- We will not proceed with implementation of a mandatory statement on bills stating that the customer may not be on the cheapest tariff and how to switch.
- A licence requirement will be implemented for energy suppliers to identify if there are alternative measures or options available other than the security deposit and to provide Small Business Consumers with clear information (within contract terms and conditions) around when their security deposit will be paid back to them.
- A licence requirement will be implemented to specify that a deemed contract must not require a customer to give any form of notice before they are able to change supplier.
- The matter of prepayment meters for Small Business Consumers should be raised as a Change Request for the Central Design Authority (CDA) Board<sup>5</sup> to decide whether it merits further consideration and impact assessment by industry participants.

We are required to consult and give notice to the relevant licensees of our intention to introduce licence modifications (in accordance with Article 14(2) of both the Electricity Order and the Gas Order). Separate legal notices to meet this requirement have been published alongside this position paper.

The introduction of the 'Non-domestic Code of Practice on minimum standards on Payment of Bills' will be introduced via a new CoP 'Non-domestic Code of Practice on the Minimum Standards on Payment of Bills'.

**Table 1: Summary of Measures**

Measure	Proposal to progress	Implementation method
<b>Scope:</b> Modification to the scope of coverage applied to non-domestic consumer protection measures via the Small Business Consumer definition within supply licences.	x	N/A

<sup>5</sup> The Central Design Authority Board is responsible for administering the Market Registration Code (MRC) Change Procedure. It's function and activities are described in the MRC ([25092021 MRC\\_Final](#))

Measure	Proposal to progress	Implementation method
<p><b>1.</b> Suppliers to provide transparent price information (which includes standing charges, unit rates and all other associated charges per electricity meter and gas meter) for Small Business Consumers on their website.</p>	✓	New licence requirement
<p><b>2.</b> Suppliers to publish information on their websites clearly signposting non-domestic consumers to relevant support and advice services.</p>	✓	Introduction of a new Non-domestic CoP
<p><b>3.</b> Mandatory statement on bills stating that the customer may not be on the cheapest tariff and how to switch.</p>	✗	N/A
<p><b>4.</b> Suppliers to identify if there are alternative measures or options available other than the security deposit and to provide Small Business Consumers with clear information (in contract terms and conditions) around when the security deposit will be paid back to them.</p>	✓	New licence requirement
<p><b>5.</b> Specification that a deemed contract must not require a customer to give any form of notice before they are able to change supplier.</p>	✓	New licence requirement
<p><b>6.</b> Exploration of a Prepayment Meter solution for Small Business Consumers.</p>	✓	Matter to be raised for consideration by the Central Design Authority Board

# 1. Introduction and Background

- 1.1 Protecting consumers is at the heart of Utility Regulator's (UR) role and we pursue this, where appropriate, through promoting effective competition in the Northern Ireland energy market. 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 Consumer Protection Programme<sup>6</sup> (CPP24) has played a pivotal role in ensuring consumers in Northern Ireland are protected. CPP24 is a central element of our Corporate Strategy<sup>7</sup> and is our principal vehicle to deliver positive outcomes for electricity, gas, and water consumers in Northern Ireland.
- 1.3 CPP24 was launched April 2024, and for the first time included themes and projects aimed at enhancing consumer protection for non-domestic consumers. This change reflects our enhanced focus on issues facing non-domestic consumers as the organisation reshapes to meet the current and future challenges of the energy market in Northern Ireland.
- 1.4 In May 2024, we published a position paper<sup>8</sup> following our 'Review of the Regulation of the Non-Domestic Energy Retail Market' (the Review). As part of the Review, we undertook a programme of research and published a Call for Input (Cfi)<sup>9</sup> to gather information on the non-domestic energy market in Northern Ireland, in order to help identify key concerns and issues within the market. This helped form the basis of what projects would be included in CPP24 regarding non-domestic consumers.
- 1.5 'Improving the Non-domestic Consumer Experience' (CPP24 Project #23) is one of the projects committed to under CPP24. The Review identified several areas where non-domestic consumers were being impacted adversely and areas where there were concerns of gaps in the existing regulatory framework. This included, but was not limited to, areas such as tariff transparency and published information.
- 1.6 In October 2024, we published a consultation paper<sup>10</sup> inviting responses from stakeholders on the scope of coverage of non-domestic measures and six proposed new measures with the aim of enabling and empowering non-domestic consumers.

<sup>6</sup> [CPP 2024-2029 Decision Paper](#)

<sup>7</sup> [UR Corporate Strategy 2024-2029](#)

<sup>8</sup> [Review of the Regulation of the Non-Domestic Energy Retail Market- Position Paper \(2024\)](#)

<sup>9</sup> [Review of the Regulation of the Non-Domestic Energy Retail Market- Call for Input \(2023\)](#)

<sup>10</sup> [Improving the Non-Domestic Consumer Experience- Consultation of proposed measures \(2024\)](#)

## Strategic Aim and Objectives

1.7 As this project is a continuation of the work initiated by the Review, the strategic aim and objectives of this project remain consistent with the previous aims and objectives, as we work to further develop and implement measures.

1.8 Therefore, the strategic aim of this project is to:

**Identify and remedy gaps in the existing non-domestic regulatory framework to ensure fair engagement and outcomes in the retail energy market for business consumers.**

1.9 This aim aligns with UR's Corporate Strategy 2024-2029: 'Strategic Objective 4 - Providing the highest level of consumer service and protection.'

1.10 In order to achieve the Strategic Aim, the 'Improving the Non-domestic Consumer Experience' project has the following objectives:

- a) **INFORM** stakeholders of the high-level findings of the research related to the non-domestic energy retail market in Northern Ireland;
- b) **GATHER** a broad spectrum of information relating to the current regulation of the non-domestic energy retail market in Northern Ireland;
- c) **IDENTIFY** any areas where the existing regulations are inadequate or need strengthened to provide sufficient protections to non-domestic consumers;
- d) **DEVELOP** a range of options for measures which could be implemented to strengthen the protections for non-domestic consumers (if required). These may range from measures which could be implemented promptly, or alternatively the identification of longer-term projects that may require further investigation (i.e. identifying future CPP projects);
- e) **CONSIDER** the regulatory policy implications of any such measure (such as the requirement for consultations, licence modifications, and / or amendments to Codes of Practice (CoP)); and
- f) **IMPLEMENT** any required changes and monitor outcomes.

## Scope

- 1.11 This project has focused on the experiences of all non-domestic consumers of both gas and electricity; including all sizes and sectors.

## Position paper

- 1.12 Overall, we received 14 written responses to the October 2024 consultation paper, with representations from industry (gas and electricity suppliers, electricity Distribution Network Operator (DNO)) and consumer bodies.

- 1.13 Non-confidential submissions were received from the following organisations:

- Advice NI
- Budget Energy
- Consumer Council Northern Ireland (CCNI)
- Construction Employers Federation (CEFNI)
- Click Energy
- The Energy Association of Ireland (EAI)
- Electric Ireland
- Firmus Energy
- Major Energy Users' Council (MEUC)
- Mineral Products Association Northern Ireland (MPANI)
- NIE Networks (NIEN)
- Power 2 Business Ltd (P2B)
- Power NI
- SSE Airtricity

- 1.14 All non-confidential responses have been published as annexes to this paper and can be found on our website – [www.uregni.gov.uk](http://www.uregni.gov.uk)

## Structure of this Paper

- 1.15 Section 1 outlines the background, strategic aim, objectives, and scope of the 'Improving the Non-domestic Consumer Experience' project.
- 1.16 Section 2 provides background to the measures consulted upon, a summary of responses received, UR comments on responses received and subsequent UR proposals.
- 1.17 Section 3 provides further information on the next steps for implementation of the measures.

## 2. Consultation Responses

- 2.1 This section provides an overview of each proposed measure followed by a summary of the responses received in relation to each question posed in the consultation paper. Subsequently, 'UR Comment' provides a view on the responses received and 'UR Proposal' provides further information on intended next steps.

### Scope of Coverage

#### Background

- 2.2 Currently in Northern Ireland there are various regulatory protections afforded to Small Business Consumers by application of the definition provided within the electricity and gas supply licences. These protections include licence requirements around contract terms and conditions and non-domestic specific CoPs such as the 'Marketing Code of Practice for Business Customers'<sup>11</sup> and the 'Code of Practice on Non-domestic Bills and Statements'<sup>12</sup>.
- 2.3 The Small Business Consumer<sup>13</sup> definitions as provided in electricity and gas supply licences are set out below in Table 2.

**Table 2: Small Business Definitions**

Licence	Term	Definition
Northern Ireland Gas Supply	Small Business Consumers	A business consumer supplied with gas and consuming less than 73.2 MWh per annum based on the Annual Quantity of the supply meter point as defined by the Network Code. This does not include a business consumer that is a simple legal entity with more than one premises where the total gas consumption of these premises is more than 73.2 MWh per annum.

<sup>11</sup> [Marketing Code of Practice for Business Customers \(2015\)](#)

<sup>12</sup> [Code of Practice on Non-domestic Bills and Statements \(2017\)](#)

<sup>13</sup> Throughout the paper we refer to both electricity 'Small Business Customer' and gas 'Small Business Consumer' definitions as set out in Table 2 as 'Small Business Consumer'

Licence	Term	Definition
Northern Ireland Electricity Supply	Small Business Consumers	A Non-Domestic Customer supplied with electricity and consuming less than 50 MWh per annum based on its most recent previous actual 12 months consumption or, where such data is not available, the estimated consumption used for customer billing or the Actual or Estimated Usage Factor (AUF or EUF) as defined in the Market Registration Code approved by the Authority in accordance with a condition of the Distribution Licence held by a Licenced Distributor. This does not include a non-domestic consumer that is a single legal entity with more than one premises where the total electricity consumption of those premises is more than 50 MWh per annum.

- 2.4 Certain protections for electricity non-domestic consumers in Great Britain (GB) (under the Micro Business Consumer supply licence definition) are set at an annual consumption below 100,000 kWh (100 MWh), which equates to double the consumption level of that applied within Northern Ireland under our Small Business Customer definition (50 MWh).
- 2.5 Similarly, certain protection for gas non-domestic consumers in GB (under the Micro Business Consumer supply licence definition) are set at an annual consumption below 293,000 kWh (293 MWh), which is almost four times higher than the level of 73.2 MWh per annum applied within Northern Ireland under the Small Business Consumer definition. Considering these differing jurisdictional definitions, we wanted to review the suitability of our definitions.
- 2.6 The latest UR Quarterly Transparency Report<sup>14</sup> stated that there are 66,638 electricity consumers in the 0-50 MWh category and 10,640 gas consumers in the up to 73.2 MWh category and therefore included within the current definition of Small Business Consumer.
- 2.7 Therefore, we requested respondents' views on the threshold currently applied via the Small Business Consumer definitions within Northern Ireland Supply licences, and whether these definitions provide a suitable scope of coverage for the measures consulted on.

<sup>14</sup> [Quarterly Retail Energy Market Monitoring Report \(Q1 2025\)](#)

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

## Responses

- 2.8 The majority of respondents (nine) were of the view that the current licence definitions of Small Business Consumer provide a suitable scope of coverage for both electricity and gas.
- 2.9 Both firmus Energy and SSE Airtricity were of the view that this scope of coverage would ensure a practical and manageable framework for implementation as it will align with existing regulatory frameworks and network definitions, thus ensuring consistency and simplicity for suppliers.
- 2.10 Budget Energy agreed that this scope is “fair and suitable” and that any adjustments to these thresholds should only be considered if there is clear evidence of significant negative impacts on consumers exceeding these levels.
- 2.11 MEUC and Power NI were both in support of maintaining the current small business definitions, with MEUC commenting that the current scope was “appropriate”, and Power NI deemed it to be “suitable”.
- 2.12 A Third Party Intermediary (TPI), P2B, was also supportive of the current definition in its response, noting that 87% of the total I&C connections for electricity and 71% of I&C natural gas consumers already fall into this range, “indicating an existing high proportion of the overall I&C market at this point” are already afforded protections under this definition.
- 2.13 While CCNI agreed that the proposed scope of coverage for small businesses is suitable, it suggested modification of the definition to include micro businesses<sup>15</sup> as a separate category since micro businesses make up a significant portion of the small business sector in Northern Ireland and may warrant individual attention to ensure they are not overlooked (in particular those of which have 1-4 employees).
- 2.14 However, four respondents indicated that the scope defined within the Small Business Consumer definition was not suitable for reasons described below.

<sup>15</sup> Defined as having between one and nine employees by Enterprise Research Centre. [Understanding micro-businesses in Northern Ireland ERC Research Report- 2018](#)

- 2.15 MPANI proposed the scope of protections be extended to include all non-domestic consumers, while CEFNI suggested annual electricity consumption up to 100 MWh and gas consumption up to 200 MWh as this would “better reflect the energy needs of many smaller family businesses that have high energy demands”.
- 2.16 Advice NI suggested that the HMRC definition of small business<sup>16</sup> should be considered by UR as it could provide a more practical and consumer-focused framework; and that “a more tangible definition should include the size, profit and energy use of the business”. It stated that the current licence definition was “complex and confusing, as it is not a language that many people understand”.
- 2.17 NIEN indicated that there could be possible complications around monitoring and enforcing our current definition for reasons such as a single legal entity could have multiple premises registered with different suppliers and customers could be near the threshold but fall in and out of scope regularly as their usage changes. It noted that in NIEN tariffs, small business customers are defined as those with connected capacity below 70kVA.

### UR Comment

- 2.18 Following assessment of the consultation responses, the majority of respondents supported the existing definition, and we are of the view that there is currently insufficient evidence provided in responses to indicate that a modification to the scope of coverage provided by the Small Business Consumer licence definition is required at this time.
- 2.19 However, we will continue to monitor the effectiveness of the current definitions throughout CPP24 and will remain open to reviewing this if evidence should emerge which indicates that the scope is not providing adequate protection to businesses. This includes consideration of NIEN’s comments regarding complications around monitoring and enforcing of our current definition.
- 2.20 We will also consider how the Small Business Consumer definitions might be best presented and further explained to consumers in clearer terms, as suggested by several respondents. This could include, but not be limited to, providing an explanatory note to accompany publications that reference the Small Business Consumer licence definitions. This accompanying note may be similar to that provided within the Small

<sup>16</sup> “A micro business has less than 10 employees and a turnover of less than £2m. A small business has less than 50 employees and a turnover of less than £10m. A medium business has less than 250 employees and turnover under £50m”. [Companies House accounts guidance - GOV.UK](https://www.gov.uk/guidance/companies-house-accounts-guidance)

Business Charter FAQs<sup>17</sup>, and reference factors such as the average spend that this energy usage would equate to aiming to be more relatable and easily understood by consumers, providing clarity as to whether they fall within the scope.

- 2.21 As highlighted in CCNI’s response, we acknowledge the potential vulnerabilities of micro businesses and will continue to engage with business representatives in this area to understand how micro businesses are impacted. There is potential for separating the micro business and Small Business Consumer definitions in future if specific measures should be deemed necessary which are solely applicable to micro businesses. However, at present measures which are applicable to all Small Business Consumers include micro businesses and no specific consumer detriment has been identified regarding micro businesses.
- 2.22 Finally, whilst we do not consider alternative small business definitions (such as that used by HMRC) to be suitable as it does not reference energy usage specifically, we acknowledge that it is essential that the scope of coverage is easily understood by consumers. We expect that the accompanying note referenced in 2.20 will help address this.

**UR PROPOSAL:** UR will maintain the current scope of coverage provided by the Small Business licence conditions.

## Transparency and Information

### **Potential Measure 1 – Suppliers to publish tariff rates for small businesses on their website.**

#### **Background**

- 2.23 Responses to our ‘Measures to Enhance the Operation of the Small Business Energy Market’ consultation<sup>18</sup> in 2018 suggested a lack of price transparency in the market and a resulting lack of market engagement and switching for Small Business Consumers. However, our decision paper at that time did not mandate tariff publication on the basis that suppliers voluntarily committed to providing their pricing information, including small business tariffs, to CCNI (or another third-party provider) for publication on its price comparison tool. We stated that we would review this again after a period and would proceed with a licence

<sup>17</sup> [Small Business Energy Charter Winter 2024/2025 -FAQs](#)

<sup>18</sup> [Measures to Enhance the Operation of the Small Business Energy Market- Decision Paper \(2018\)](#)

modification to mandate tariff transparency, if not satisfied that the level of transparency being provided was adequate.

- 2.24 During our 2024 programme of research, concerns were raised by a variety of stakeholders around the effectiveness of CCNI's price comparison tool. Several respondents, including CCNI, suggested that the tool was perhaps not providing an accurate representation of available tariffs as it was not being updated by all suppliers regularly.
- 2.25 In its response to our CfI, CCNI recommended that tariff updates should be mandated for suppliers and suggested that publication of non-domestic tariffs on suppliers' websites would provide an additional source of information for the small non-domestic consumer and could make the market more competitive.
- 2.26 Our 2023 Non-domestic Consumer Insight Tracker Survey<sup>19</sup> also highlighted that three quarters (74%) of non-domestic consumers said they were not aware of CCNI's energy price comparison tool, with only 11% reporting they had used it. This indicates that suppliers' websites could be a more prominent place for tariff publication.

**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 and gas meter, which is available for a Small Business Customer to enter into a supply contract?

## Responses

- 2.27 Responses to this measure were mixed; with six (out of thirteen) respondents, including two suppliers, supporting mandated transparent price publication.
- 2.28 CCNI stated that it is "imperative" that suppliers are mandated to provide transparent tariff information for small businesses. It noted that some suppliers chose not to engage with the comparison tool as there are no mandatory requirements for them to share updates or tariff changes.

<sup>19</sup> [Non-Domestic Consumer Insight Tracker Survey \(2023\)](#)

Therefore, CCNI confirmed that it had “little confidence” that this tool is up-to-date and accurate, which results in it not actively being promoted by the organisation.

- 2.29 CCNI also suggested that the licence should require suppliers to publish their tariffs on both their website and on CCNI's price comparison tool, within one working day of any changes, as “this would ensure that consumers have timely access to information and would ensure suppliers are held to the same standards, promoting fair competition in the market”.
- 2.30 Advice NI suggested non-domestic consumers can lack the time and resources to contact multiple suppliers in search of the best deals. It therefore suggested that suppliers should have tariffs advertised clearly on their own websites and include details on CCNI's price comparison tool as this will create “healthy competition” and allow consumers to make “informed decisions”.
- 2.31 Six respondents expressed support for an effective centralised publication/comparison tool rather than solely publishing on the supplier's own website; suggesting that this would make it easier for small businesses to access and evaluate the available tariffs.
- 2.32 Although P2B did not support mandating price publication, it stated that suppliers would benefit from providing price information on their websites as not supplying this information could be “viewed by consumers as a stumbling block to be able to make quick decisions”.
- 2.33 Of the seven respondents that did not support mandating transparent price publication, the reasoning provided by four (three of which were suppliers) was that pricing information was already being provided to CCNI for publication on its price comparison tool.
- 2.34 Four respondents questioned the practicality of implementing this measure in the non-domestic energy market due to many suppliers creating bespoke quotations. This included MPANI, which suggested that price alone is not a sole factor for differentiation as suppliers offer varied product types.
- 2.35 SSE Airtricity also commented that this measure would not be suitable due to the “unique and dynamic nature of non-domestic energy pricing”. Instead, it suggested that exploring improvements to the existing CCNI tool could provide non-domestic consumers with the necessary information they need to make informed decisions.
- 2.36 Additionally, Click Energy noted that non-domestic tariffs can be negotiated usually depending on the customer's level of demand and

that updates are more frequent within this market, making it difficult to maintain updates. P2B agreed that product offerings are continually changing if it is a market tracker product.

- 2.37 Of the six respondents that answered yes to Question 2a, most (five) suggested that this measure should be implemented via a licence requirement or CoP.
- 2.38 All respondents that addressed Question 2c (nine) suggested that the required pricing information should include standing charges, unit rates and all other associated charges per electricity meter and gas meter. It was suggested that this will ensure that small businesses fully understand the implications of their contracts and avoid any unexpected charges. Five respondents indicated that a standardised format would be necessary to ensure the comparability of tariffs.

### UR Comment

- 2.39 We consider having clear and transparent access to price information to be a fundamental requirement for fully effective competition. A lack of tariff transparency may hinder small non-domestic consumers in particular from engaging meaningfully in the market, impacting switching ability and competition.
- 2.40 We acknowledge that some suppliers are already providing tariff updates to CCNI. However, without regular updates from all suppliers, the tool risks providing outdated and inaccurate tariff information. CCNI stated that it has been unable to promote the website due to lack of confidence in the accuracy and reliability of the information.
- 2.41 Therefore, we consider it an important step that suppliers be mandated to provide easily accessible pricing information prominently on their websites. Greater transparency will ensure that consumers are provided with an accurate representation of available tariffs meaning that they have an ability to compare options and make proactive choices about which energy contracts best meet their needs, improving competition within the retail energy market.
- 2.42 We acknowledge comments that contracts can be negotiated individually; however, this is highly dependent on the consumer's ability, time and knowledge to do so.
- 2.43 We are of the view that through this licence requirement the publication on supplier websites will become a valuable, trusted source and as such, this data could also be extracted and used within a price comparison tool. Therefore, UR will not propose it to be mandatory for suppliers to also update a centralised platform directly, as several responses requested.

- 2.44 Any decision regarding the operation of the CCNI small business comparison tool sits with CCNI, and any decision on associated tariff sharing arrangements sits with UR. CCNI will continue to liaise with suppliers to empower small business users to get the most up to date and transparent information for both natural gas and electricity tariffs.
- 2.45 Finally, we agree with respondents that stated the required pricing information should include standing charges, unit rates and all other associated charges per electricity meter and gas meter.

**UR PROPOSAL:** UR will implement a licence requirement for energy suppliers to provide transparent price information (which includes standing charges, unit rates and all other associated charges per electricity meter and gas meter) for Small Business Consumers on their website.

## **Potential Measure 2 – Suppliers to publish information signposting to customer support services.**

### **Background**

- 2.46 Our programme of research indicated that Small Business Consumers could benefit from being signposted to support services as this cohort of customers often have lower levels of resources and consequently are less likely to have energy dedicated teams and knowledge, in comparison to larger non-domestic consumers. This means that they may have a similar level of energy market knowledge and resources as domestic consumers, therefore requiring similar support services.
- 2.47 The findings of the 2023 Non-domestic Consumer Insight Tracker Survey found that 61% of small and medium sized businesses were not aware of the minimum standards of customer service (i.e. targets around complaints handling) that energy suppliers must meet.
- 2.48 Currently, there are protections in place for domestic consumers around information provision and signposting, as suppliers are required to comply with the 'Code of Practice minimum standards on Payment of Bills'<sup>20</sup> which requires suppliers to seek permission from the relevant advice-giving organisations to share their contact details and publish an up-to-date list of said contact details on their website.

<sup>20</sup> [Annex 1b Code of Practice minimum standards on Payment of Bills](#)

**Question 3a.** Should energy suppliers be required to publish information on their websites signposting 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).

## Responses

- 2.49 The majority of respondents (ten) were in favour of suppliers being required to publish information on their websites signposting non-domestic consumers to relevant support and advice services.
- 2.50 Two suppliers; Power NI and firmus Energy, confirmed that they currently provide support to non-domestic consumers and already direct these consumers to advice organisations when appropriate.
- 2.51 Advice NI welcomed this requirement and stated that signposting should be a minimum requirement. It noted the importance of developing working referral partnerships and mutual understanding of the “power that proper referrals can have for consumers”.
- 2.52 It was raised by two respondents that, unlike domestic consumers, there are considerably less support services available for non-domestic consumers. Electric Ireland noted that some services in the market require a fee to use their advice and support services.
- 2.53 Two suppliers opposed this measure being mandated. One of which, SSE Airtricity, suggested that providing a single point of information instead could act as a “one-stop-shop for all consumer information”. It suggested that this would prevent the “duplication of efforts, reduce the risk of conflicting advice, and simplify the process for non-domestic consumers, providing them with a clear port of call for their energy-related queries and support needs”.
- 2.54 The second, Click Energy, commented that an individual that chooses to open a business “should be aware of any support available to them and fully capable of doing whatever is needed to get the support their business requires”.
- 2.55 Respondent views were mixed as to how this measure should be implemented; five suggested implementation via a guidance document, four suggested via a CoP, one suggested via a licence requirement and one suggested that it should be implemented on a voluntary basis.

## UR Comment

- 2.56 We do not agree with Click Energy’s comment that businesses “should be aware of any support available to them”. We consider it essential that Small Business Consumers are directed to support and advice services in the same manner as domestic consumers, ensuring that they receive consistent levels of advice and support.
- 2.57 We acknowledge SSE Airtricity’s call for a “one-stop shop”; however, in its absence supplier websites are an important source of information for consumers.
- 2.58 A CoP is the most appropriate mechanism for implementation in our view and aligns with how this requirement has been applied for domestic consumers within the 'Code of Practice on minimum standards on Payment of Bills'.

**UR PROPOSAL:** UR will implement a requirement for energy suppliers to publish information on their websites clearly signposting non-domestic consumers to relevant support and advice services. This will be introduced via a new CoP ‘Non-domestic Code of Practice on the Minimum Standards on Payment of Bills’. This CoP may introduce protections beyond signposting; however, this will be for consideration during development of the CoP and any resulting proposals will be consulted on. This work will commence in Summer 2025 and we expect a draft CoP to be consulted upon in Autumn 2025. This new CoP will be implemented via a licence modification later in the year.

### **Potential Measure 3 – Standard, mandatory statement on bills stating that the customer may not be on the cheapest tariff and how to switch.**

#### Background

- 2.59 A consumer’s understanding of tariff options and switching ability is fundamentally important for their engagement and promotion of effective competition within the retail energy market.
- 2.60 For domestic consumers, Principle 4 of the ‘Code of Practice on Domestic Bills and Statements’<sup>21</sup> states that customers will be made aware that there may be cheaper tariffs available to them and that the supplier will highlight to the customer that there may be cheaper tariff options available.
- 2.61 Although a non-domestic CoP exists, it does not contain this requirement for messaging of a cheaper tariff. This was not implemented initially when

<sup>21</sup> [Code of Practice on Domestic Bills and Statements \(2017\)](#)

the code was introduced. Our 2017 decision paper<sup>22</sup> stated this was due to concerns regarding the operation of the mandated statement and its applicability to all customers.

- 2.62 In our 2018 decision paper on 'Measures to Enhance the Operation of the Small Business Energy Market' the decision was made not to mandate inclusion of a statement that consumer may not be on the cheapest tariff and how to switch. This followed consideration of the potential issues associated with its inclusion, such as the concern that it would create an expectation that consumers could switch in the middle of a contract.
- 2.63 However, in order to help address concerns around consumer switching ability and knowledge, we wanted to explore if this statement could be presented in some alternate format which does not create an expectation of a consumer being able to switch (without contractual implications) in the middle of a fixed contract for example

**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.

## Responses

- 2.64 Only a minority of respondents (five) supported inclusion of a standard, mandatory statement stating that the consumer may not be on the cheapest tariff and information on how to switch. This included firmus Energy and Advice NI, that were of the view that implementing such a measure would enhance the consumer experience and increase engagement.

<sup>22</sup> [Implementation of a new supplier Code of Practice on Energy Bills and Statement- Final Decision \(2017\)](#)

- 2.65 CEFNI also viewed this measure as “essential”, noting that many businesses often overlook the details of their energy contracts as they focus on managing other pressing priorities within the business.
- 2.66 Click Energy commented that it has already implemented an equivalent of this measure for both domestic and non-domestic consumers.
- 2.67 However, of the 13 respondents that answered this question, eight opposed non-domestic consumer bills including a standard, mandatory statement stating that the consumer may not be on the cheapest tariff and information on how to switch.
- 2.68 Three respondents raised concerns around use of the term “cheapest”. SSE Airtricity suggested that this term could be problematic as the “cheapest” tariff may not always align with a “business’s specific energy needs, risk appetite or priorities”. Similarly, Electric Ireland stated that the phrasing only focuses on price and this is only one of the many factors that consumers must consider. Additionally, if a consumer enquires about their tariff, suppliers cannot determine the cheapest tariff on the market in real time.
- 2.69 Two respondents (Power NI and EAI) noted that current requirements are sufficient as suppliers are already mandated to include a statement on consumer bills to inform the customer that other suppliers exist for comparison<sup>23</sup>. EAI noted that for many suppliers, this is accompanied by a link to CCNI’s website where a list of alternative tariffs can be viewed.
- 2.70 Two respondents (SSE Airtricity and EAI) had concerns implementing this measure due to the bespoke nature of contracts. EAI noted that energy requirements, consumption patterns, and pricing structures often differ, therefore non-domestic consumers should be managed on a “case-by-case basis”.
- 2.71 Two suppliers (Electric Ireland and Budget Energy) raised concerns around implementing this measure due to the limited space on bills. Electric Ireland commented that “incorporating any further information would be challenging to accommodate and could risk saturation of content on the bills and detract from the important messaging on the bills at present”.
- 2.72 Of the seven respondents that answered question 4b, the majority (four) of were in favour of implementing a licence requirement.
- 2.73 Five respondents to question 4c, suggested other publications that this statement should be included in such as renewal notices and annual energy usage summaries (CEFNI), price change or tariff update letters

<sup>23</sup> Code of practice on non-domestic bills and statements 3.4.1

and debt letters (Click Energy), all relevant consumer correspondence (CCNI) and websites and newsletters (Advice NI). Electric Ireland also suggested, “an alternative and fairer approach would be to ensure signposting to the CCNI Business Electricity price comparison tool”.

### UR Comment

- 2.74 We acknowledge concerns around the term “cheapest” and how this interacts with the bespoke, dynamic nature of non-domestic tariffs, including evaluation of individual contractual needs which are contingent with many factors rather than tariff alone.
- 2.75 As in the 2018 decision, we remain of the view that implementing such a statement could potentially create a false expectation that the consumer could switch in the middle of their contract. The current requirement under the ‘Code of Practice on Non-domestic Bills and Statements’ (3.4.1) may already provide some prompt for tariff comparison since this requirement is met by most suppliers providing a link to CCNI’s comparison tool. Although the requirement itself lacks direct reference to the possible existence of ‘cheaper tariffs’, it requires the supplier to provide details of where the customer can obtain impartial advice and information about changing electricity and gas suppliers.
- 2.76 However, we will continue to monitor market engagement throughout CPP24 and will remain open to reviewing the requirement for such a statement if evidence should emerge which indicates a detrimental impact to consumers.

**UR PROPOSAL:** UR will not implement a requirement for suppliers to include a standard, mandatory statement on bills stating that the customer may not be on the cheapest tariff and how to switch.

## Potential Measure 4 – Security deposits with respect to the duration these may be held for.

### Background

- 2.77 Electricity Supply Licence Condition 27A and Gas Supply Licence Condition 2.22 state that security deposits should not be required for Small Business Consumers where it is ‘unreasonable in all circumstances’ and set a cap for the security deposit amount that can be requested as the amount charged for a three-month supply average. There is also a requirement for a published calculation methodology for security deposit calculation.

- 2.78 In our 2018 decision paper on ‘Measures to Enhance the Operation of the Small Business Energy Market’ we decided that it would remain up to the supplier to determine when the security deposit can be returned to the customer. The reasoning for this decision was that the restriction of the security deposit to the amount charged for a three-month supply average should ensure that even if the security deposit is held for the entire time that the customer is with the supplier, it would not be overly onerous and strikes a fair balance between protecting the consumer and allowing the supplier to cover its risk.
- 2.79 However, during our programme of research for the Review, concerns continued to be raised around when security deposits are being returned to consumers, leading us to consider if further measures should be implemented.

**Question 5a.** Should there be a requirement for suppliers to provide non-domestic 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).

## Responses

- 2.80 The majority of respondents (eight) supported implementation of a requirement for suppliers to confirm if there are alternative measures or options available other than payment of a security deposit and to provide non-domestic consumers with clear information around when a security deposit will be paid back to them.
- 2.81 Power NI stated that this is a “fair requirement” as all suppliers should be required to provide clear timelines and transparent justifications for retaining deposits. However, it suggests the assessment of any deposit held should be at an individual customer level and not based on a “broad-brush approach”.
- 2.82 CEFNI supported this measure, adding that being aware of the timeline for deposit returns is “essential” for consumers when they are financial planning. Additionally, it stated that there is a need for suppliers to explore alternatives to deposits in order to reduce upfront costs.
- 2.83 firmus Energy also supported the measure noting that their current procedure results in all security deposits being reviewed after 12 months,

with a decision made to either return or retain the deposit based on each individual consumer's account.

- 2.84 MEUC noted that there is a “major issue” that businesses with a poor credit rating are being asked to provide, typically, a three month advance of energy costs. It further stated that this situation escalates when suppliers do not return deposits in a timely manner. MEUC suggested that at the point when a final bill is due to be paid, the supplier should deduct this amount from the security deposit and return the remainder to the customer as part of a single account closing transaction.
- 2.85 Advice NI supported suppliers detailing any alternatives to a security deposit and it being “discussed with the consumer as soon as possible”. P2B also commented that “suppliers should be working on clear and consistent guidelines and all options being presented to the customer. Of particular concern is the request of deposits off customers that have not shown any poor payment record to the supplier at renewal stage”.
- 2.86 Two respondents didn't support implementation of this measure. Budget Energy and SSE Airtricity both warned against prescriptive regulations, such as introduction of fixed security deposit repayment timelines as suppliers need to manage their own credit risk proportionately on a “case by case basis”.
- 2.87 The majority of respondents (five) that responded to 5b were supportive of this measure being implemented through a licence requirement.

### UR Comment

- 2.88 UR recognises the support received for implementation of a requirement for suppliers to provide Small Business Consumers with clear information around when the security deposit will be paid back to them, and that the supplier should be required to confirm if there are alternative measures or options available other than the deposit.
- 2.89 We consider it essential that supplier processes around security deposits are transparent and clearly communicated to consumers to enable the consumer to compare options easily.
- 2.90 The requirement for suppliers to provide clear information around when the security deposit will be paid back to consumers is not intended to be a prescribed timeline. Rather, this requirement is that the security deposit is returned pursuant to the terms and conditions of the contract that have been agreed by the consumer. The timeframe for return of the deposit should be communicated clearly to the consumer at the time of entering into the contract and specified within the agreed terms and conditions.

**UR PROPOSAL:** UR will implement a licence requirement to require energy suppliers to identify if there are alternative measures or options available other than the security deposit and to provide Small Business Consumers with clear and specific information (in contract terms and conditions) around when the security deposit will be paid back to them.

## **Potential Measure 5 - Maximum notice periods on deemed contracts.**

### **Background**

- 2.91 During the Review in 2024, issues regarding length of notice periods on deemed contracts<sup>24</sup> were highlighted within both the CfI responses and our programme of research. A deemed contract is a default energy deal that a business is placed on when it has not agreed a contract with an energy supplier. For example, a deemed contract can arise when a business moves into a new business premises and uses electricity or gas before agreeing a contract with a supplier; or when a fixed contract comes to an end and a new contract is not agreed.
- 2.92 Current requirements on notice periods are set out in UR's Electricity Supply Licence Condition 27 and Gas Supply Licence Condition 2.18 and state that where a supplier enters into a fixed term contract with a Small Business Consumer it may not include any term or condition that prevents the small business from terminating the contract at any time after that initial fixed term period without a notice period or payment of a termination fee.
- 2.93 This condition also notes that any such contract may not include any term or condition which has the effect of extending the length of that fixed term period or applying a consecutive fixed term period, unless the Small Business Consumer has the right to terminate the contract at any time in the extended or consecutive fixed term period without a notice period or payment of a termination fee.
- 2.94 UR Supply licence conditions also state that suppliers must take all reasonable steps to ensure that the terms of each of its deemed contracts are not unduly onerous (Electricity Supply Licence Condition 28, Gas Supply Licence Condition 2.1.3).
- 2.95 However, we wanted to explore if the licence should explicitly state that consumers should not be required to provide a notice period under deemed contracts.

<sup>24</sup> means, as between the Licensee and a Customer, a contract for the supply of electricity deemed to have been made under paragraph 3 of Schedule 6 to the Order.

**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).

## Responses

- 2.96 The majority of respondents (ten) were supportive of notice periods under deemed contracts being prohibited.
- 2.97 Power NI stated it has already implemented this measure and noted instances of contracts with a notice period having the effect of “locking customers in” for a longer period.
- 2.98 MEUC also supported the measure and stated that supplier switching itself has a timescale set by the “industry’s agreed procedures and an incumbent supplier will be given sufficient warning of any impending customer loss”.
- 2.99 However, some respondents (three) were not in favour of implementing this measure. Budget Energy, EAI and SSE Airtricity suggested that a reasonable notice period should be maintained as customers approaching the end of their fixed-term contracts are already notified in advance about upcoming rate changes and the alternative contract options available to them.
- 2.100 SSE Airtricity indicated that notice periods are necessary in some circumstances to safeguard the supplier from “financial exposure”. For example, “when customers are coming to the end of their fixed term contracts, they receive notifications in advance to make them aware of change in rates and the alternative contractual options available to them. If they choose to move to out of contract rates or shop around for an extended period, suppliers will continue to serve these customers and therefore a reasonable notice period should be retained in this circumstance”.
- 2.101 Additionally, Budget Energy noted concern that without notice periods, unpredictable “consumer movement” could lead to higher costs which may be passed on to consumers.
- 2.102 The majority of respondents (seven) were in support of this measure being implemented through a licence requirement.

## UR Comment

- 2.103 We are of the view that suppliers should have a reasonable expectation that a deemed contract will only be a temporary feature of their relationship with a customer.
- 2.104 We recognise that licence requirements are in place to ensure that Small Business Consumers are notified in advance of both any proposed contract variation (including change of price) and of the expiry date of a fixed term contract (Condition 27: Terms and Conditions of Electricity Supply Contracts paragraphs 19-20). However, as the customer does not expressly enter into a deemed contract, and we recognise that such contracts are unlikely to offer more favourable terms than those that could be accessed under alternate contracts, it does not seem appropriate for a consumer to be required to provide a notice period before being able to change supplier.

**UR PROPOSAL:** UR will implement a licence requirement to specify that a deemed contract must not require a customer to give any form of notice before they are able to change supplier.

## Other Measures

### **Potential Measure 6 - Prepayment Meters for non-domestic consumers.**

#### **Background**

- 2.105 Our 2023 Non-domestic Consumer Insight Tracker Survey showed that over one quarter (27%) of respondents said that they sometimes struggle to pay their electricity bills, and one quarter (24%) stated that they sometimes struggle to pay their gas bills but usually manage to stay on top of their bills. Over half (53%) of non-domestic consumers reported that they were concerned or very concerned about their organisations' energy bills.
- 2.106 During the Review, the importance of debt prevention continued to be highlighted, with one industry representative responding to our CfI commenting that prepayment metering for non-domestic customers had already been explored and they were "disappointed" that it was not progressed. The respondent suggested that it might be included in the smart metering design for micro businesses.
- 2.107 In our 2018 decision paper on 'Measures to Enhance the Operation of the Small Business Energy Market', we noted that the potential for an

electricity prepayment meter for small businesses should be fully examined. Therefore, this proposal was referred to the industry working group, the Central Design Authority Board<sup>25</sup>. This referral was for electricity only and not for gas due to the size of the gas market.

- 2.108 In June 2021 following a period of investigation, the ‘Keypad Meter for micro-business’ Discussion Request was withdrawn from the CDA Board due to concerns over implementation and how meter functionality could meet the required de minimus thresholds with regard to VAT recovery.

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

### Responses

- 2.109 The majority (eight) of respondents supported further exploration of the feasibility of an electricity prepayment meter solution for non-domestic consumers.
- 2.110 Several respondents were of the view that a prepayment meter solution could benefit some non-domestic consumers. MEUC highlighted that prepayment meters have already been implemented in GB for businesses, stating that this provides a benefit to businesses that cannot afford the typical security deposit and they have “almost zero supplier risk of bad debt”. CEFNI also stated these meters could be beneficial for site offices, especially in temporary locations.
- 2.111 Consumer representatives were of the view that this option should be further explored and called for further research to be performed. CCNI stated that as debt management remains a concern within the Northern Ireland non-domestic retail market, a feasibility study or a pilot scheme on prepayment meters should be performed. Advice NI also requested additional information around what the advantages and disadvantages would be.
- 2.112 However, respondents raised practical issues around the implementation of such a measure. NIEN and several suppliers again highlighted why a similar proposal was not taken forward when raised in 2019, including the standardised VAT rates within the keypad system meaning that only one

<sup>25</sup> The Central Design Authority Board is responsible for administering the Market Registration Code (MRC) Change Procedure. Its functions and activities are described in the MRC ([25092021\\_MRC\\_Final](#))

VAT rate can be utilised at any time, and the Climate Change Levy varying depending on usage.

- 2.113 Despite sharing similar concerns, Power NI stated that there is scope to investigate the potential through the introduction of smart metering and were “happy to support further discussions on this where necessary”.
- 2.114 While Advice NI supported further exploration, it noted that “whilst prepayment meters help to avoid arrears and indebtedness, it may leave the consumer unable to maintain supply at certain times, and that could have serious implications for maintaining or delivering their business”.

### UR Comment

- 2.115 We recognise that there are legitimate practical issues around implementation of such a measure in Northern Ireland, as was the case when the proposal was made previously. It was not clear from the responses whether there are alternative manual solutions for such issues, or whether the operation of prepayment for non-domestic consumers in GB can provide any further insight for Northern Ireland.
- 2.116 We also acknowledge that the use of prepayment meters can come with risks for consumers such as self-disconnection. If the project were to progress, we would need to ensure that risk mitigations were put in place, such as those covered within supply licences and the ‘Code of Practice on Services for Prepayment Meter Customers’<sup>26</sup>. For example, providing the consumer with details on the amount of emergency credit associated with the meter and an explanation of how emergency credit works.
- 2.117 However, there was support amongst respondents for exploring the potential benefits that a prepayment meter option could offer some Small Business Consumers and we are of the view that it should be explored further.

**UR PROPOSAL:** The matter of prepayment meters for Small Business Consumers should be raised as a Change Request for the CDA Board, the body responsible for administering the Market Registration Code (MRC) Change Procedure. The CDA Board would then decide whether this measure merits further consideration.

<sup>26</sup> [Annex 4b Code of Practice minimum standards on Services for Prepayment Meter Customers.pdf](#)

## Additional Measures

### Background

- 2.118 It is intended that our CPP24 programme of work will remain flexible and adaptable to changing circumstances when necessary. CPP24 will be delivered across a five-year programme period between 2024 and 2029.
- 2.119 To ensure that the plan is sufficiently agile to adapt to emerging challenges and changes, we also have included a mid-term review of CPP24 to be conducted at the during year three (2026).
- 2.120 Therefore, we requested feedback on any other additional measures that respondents think should be considered for inclusion during the mid-term review of CPP24.

**Question 8a.** Are there any 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).

### Responses

- 2.121 Two respondents suggested regulation of TPIs. Power NI commented that there are often large differences in TPI commissions at the consumer level and Click Energy agreed that there is a need for “total transparency on broker commissions and their associated structures”.
- 2.122 Advice NI suggested that the introduction of an Energy Ombudsman for NI should be explored. It also suggested vulnerability needs of business consumers should also be explored as these consumers should be “treated similarly as domestic consumers”. Thirdly, it indicated that consideration should be given to support on energy efficiency through a ‘green energy scheme’, especially for micro and small businesses.
- 2.123 Electric Ireland suggested that the UR conduct, “a review of the various regulatory frameworks, policies, and Codes of Practice, to identify where simplification could be delivered”.

## UR Comment

- 2.124 We have reviewed all responses received and have taken into consideration the additional measures suggested to further protect the short-term and long-term interests of non-domestic consumers.
- 2.125 Some of these measures proposed are already being addressed under our CPP24 planned work. For example, we have committed to undertake a project to develop our understanding of the operation of TPI activity in the Northern Ireland non-domestic energy retail market which is due to be published in Summer 2025 (CPP24 Project #22).
- 2.126 A review of the energy supplier CoPs is also scheduled (CPP24 Project #19) to begin in Summer 2025.
- 2.127 We acknowledge the comments and suggestions such as the introduction of a NI Energy Ombudsman, a 'green scheme' for businesses. However, these would fall outside the scope of this project and UR vires.

**UR PROPOSAL:** CPP24 is intended to be a flexible programme of work that can adapt to fit changing circumstances when necessary. We will further consult on suggestions for additional measures during our mid-term review of CPP24 to establish the workplan for Years 4 and 5.

### 3. Next Steps

- 3.1 Alongside this position paper, we have published our statutory notices for electricity and gas suppliers with the proposed new licence conditions under Article 14(2) of the Electricity (Northern Ireland) Order 1992 and Article 14(2) of the Gas (Northern Ireland) Order 1996.
- 3.2 These Notices will follow the statutory consultation, and we intend to publish our final licence modification decisions in Summer 2025 to implement the new licence conditions by Q1 2026. Following this, we will be monitoring suppliers' compliance with this licence condition and intend to take enforcement action should suppliers fail to comply.
- 3.3 These notices will consult on the following licence modifications:
- a) Suppliers to provide transparent price information (which includes standing charges, unit rates and all other associated charges per electricity meter and gas meter) for Small Business Consumers on their website;
  - b) Suppliers to identify if there are alternative measures or options available other than the security deposit and to provide non-domestic consumers with clear information (within contract terms and conditions) around when their security deposit will be paid back to them; and
  - c) Specification that a deemed contract must not require a customer to give any form of notice before they are able to change supplier.
- 3.4 We will monitor the effectiveness of the licence changes in delivering fair and appropriate protections to on an ongoing basis. If we identify any gaps or areas for improvement, then a consultation will be carried out on any potential changes.
- 3.5 UR will implement a requirement for energy suppliers to publish information on their websites clearly signposting non-domestic consumers to relevant support and advice services. This will be introduced via a new CoP 'Non-domestic Code of Practice on the Minimum Standards on Payment of Bills'. This CoP may introduce protections beyond signposting; however, this will be for consideration during development of the CoP and any resulting proposals will be consulted on. This work will commence in Summer 2025 and we expect a draft CoP to be consulted upon in Autumn 2025. This new CoP will be implemented by a licence modification later in the year.
- 3.6 The matter of prepayment meters for Small Business Consumers should be raised as a Change Request for the CDA Board, the body responsible

for administering the Market Registration Code (MRC) Change Procedure. The CDA Board would then decide whether this measure merits further consideration.

## Annex 1: Summary of Measures

Measure	Proposal to progress	Implementation method
Scope: Modification to the scope of coverage applied to non-domestic consumer protection measures via the Small Business Consumer definition within supply licences.	✘	N/A
<b>1.</b> Suppliers to provide transparent price information (which includes standing charges, unit rates and all other associated charges per electricity meter and gas meter) for Small Business Consumers on their website.	✔	New licence requirement
<b>2.</b> Suppliers to publish information on their websites clearly signposting non-domestic consumers to relevant support and advice services.	✔	Introduction of a new Non-domestic CoP
<b>3.</b> Mandatory statement on bills stating that the customer may not be on the cheapest tariff and how to switch.	✘	N/A
<b>4.</b> Suppliers to identify if there are alternative measures or options available other than the security deposit and to provide Small Business Consumers with clear information (in contract terms and conditions) around when the security deposit will be paid back to them.	✔	New licence requirement

Measure	Proposal to progress	Implementation method
<b>5.</b> Specification that a deemed contract must not require a customer to give any form of notice before they are able to change supplier.	✓	New licence requirement
<b>6.</b> Exploration of a Prepayment Meter solution for Small Business Consumers.	✓	Matter to be raised for consideration by the Central Design Authority Board

## Glossary

Term	Description
CCNI	Consumer Council Northern Ireland
CDA	Central Design Authority
CEFNI	Construction Employers Federation
Cfi	Call for Information
CMA	Competition and Markets Authority
CoP	Code of Practice
CPP24	Consumer Protection Programme (2024-2029)
DNO	Distribution Network Operator
EAI	The Energy Association of Ireland
GB	Great Britain
I&C	Industrial & Commercial
MEUC	Major Energy User' Council
MPANI	Mineral Products Association Ireland
MRC	Market Registration Code
NIEN	Northern Ireland Electricity Networks
P2B	Power to Business Ltd
TPI	Third Party Intermediary
UR	The Utility Regulator