



Karen Shiels
Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

14 November 2024

Dear Karen,

Re: Notice and consultation on licence modification for 'Provision of Information'

I am writing regarding the consultation on licence modification for 'Provision of Information'.

The Consumer Council

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.

The Consumer Council has specific statutory duties in relation to energy, postal services, transport, water and sewerage. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

From a consumer perspective

It's positive that the UR is seeking to provide more transparency and to publish more relevant information that promotes the interest of consumers.

By providing consumers access to additional information on comparative supplier performance, and overall supplier performance, the UR can encourage improvements in customer service.

It seems logical and practical that all energy supply licences should have the same obligations in respect of providing data to the UR and be subject to the same provisions relating to its use. This would enable the UR to be more efficient in collecting energy suppliers' data.

The proposed changes leave appropriate licence protections in place where publication would "seriously and prejudicially affect their interest" (for individuals, companies or organisations) and require the UR to consult with suppliers before publishing information obtained through the provision of information condition.



Comparing with Ofgem

Ofgem publishes a much broader range of data on its website about different parts of the energy sector, including supplier performance. The charts it displays are backed up by spreadsheet data, which can be downloaded by consumers. Depending on the topic, charts are broken down by individual supplier, by suppliers of different sizes or by suppliers as a whole. Currently, the data shown is up to March 2024. Examples of performance data include:

- Total fines and redress payments over time, ease of contacting supplier, and average debt levels: shown for suppliers as a whole.
- Complaints received by (all/large/medium/small) suppliers per (100,000/10,000) customer accounts: shown by supplier and updated 6 monthly.
- Complaints resolved by (large/medium/small) suppliers: shown by the end of the next working day and within eight weeks and updated quarterly.
- Gas prepayment customers: average weekly debt repayment rates: shown by supplier at a point in time.

The [Ofgem charts](#) show that it is possible to publish data on a wide range of topics with varying levels of attribution to convey performance information to consumers.

Although not directly related to requesting data, it is worth noting that Ofgem undertakes “deep dives” into energy supplier standards. Its February 2023 review looked at customer service and complaints performance. It highlighted issues found and published a list of the level of weaknesses found at each of the 17 suppliers reviewed.

We look forward to continued collaboration with you and your colleagues on publishing more relevant information that promotes the interests of Northern Ireland consumers.

Yours sincerely,

[Redacted signature block]