



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

17 December 2024

Dear Karen,

Additional 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.

Consumer Impact

In November the Consumer Council responded to the previous consultation on licence modifications in relation to the supplier licences. We reiterate our support for the Utility Regulator (UR) 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 the relevant electricity and gas licensee performance, the UR can encourage improvements in customer service.

It seems logical and practical that all energy 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 licensees' 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 licensees before publishing information obtained through the provision of information condition.

Comparing with Ofgem

Ofgem publishes thorough data on its website about different parts of the energy sector, including performance. The charts Ofgem displays are backed up by spreadsheet data, which can be downloaded by consumers. Depending on the topic, charts are broken down by distribution, transmission and wholesale market. Currently, the data shown runs to March 2024. Examples of data include:

- Network costs
- Expenditure vs Allowance
- Consumer interruptions and minutes lost
- Customer satisfaction.

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.

Views on the overall licence modifications

The proposed modifications are similar to those already consulted on for suppliers and have the same objectives; this brings consistency across all the gas and electricity licences (suppliers/network companies/SONI/SEMO/interconnectors).

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

Yours sincerely,

[Redacted signature block]