

BEST PRACTICE FRAMEWORK: CUSTOMER CARE REGISTER PROJECT

Information and Decision Paper

November 2025

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.

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

The Customer Care Register (CCR) project is a core output of our Best Practice Framework programme to better identify, support and protect consumers in vulnerable circumstances. CCRs provide additional services to consumers who need extra support from their utility company due to their circumstances. The overarching objective for the CCR project is to create a single utility CCR across electricity, gas and water that meets the needs of vulnerable consumers so that they can overcome any barriers to accessing, using and benefiting from these essential services. The first phase of this project will be the implementation of a single electricity and gas CCR alongside the water CCR. This paper sets out the core project deliverables, the actions that are required by industry to facilitate delivery and the overarching design principles to be applied throughout the project.

AUDIENCE

This document is most likely to be of interest to regulated companies in the energy and water industries, consumer organisations and representatives, community and voluntary organisations, natural gas, electricity and water consumers, government, and other statutory bodies.

CONSUMER IMPACT

The CCR project will provide considerable benefits for domestic consumers in vulnerable circumstances by reducing the burden on consumers of having to disclose information about their vulnerability and share their support needs on multiple occasions, and ensuring that inclusion on utility CCRs equates to actionable supports specific to the consumer's needs.

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Executive Summary

The overarching objective of the Customer Care Register (CCR) project is to create a single utility CCR across electricity, gas and water that meets the needs of vulnerable consumers so that they can overcome any barriers to accessing, using and benefiting from these essential services.

The CCR project is a core deliverable of our Best Practice Framework (BPF). The BPF establishes best practice principles and measures for utility suppliers and distribution network operators (DNOs) in Northern Ireland across electricity, gas and water to implement to better identify, support and protect consumers in vulnerable circumstances.

This information and decision paper sets out our expectations on how the CCR project is to be delivered and should be used by industry to facilitate their delivery of the project. The paper summarises the relevant stakeholder feedback from the Consultation and sets out our responses to the feedback received. We set out the overarching objective and core deliverables of the CCR project, stages of delivery, organisational structure, the overarching design principles to be applied throughout the project and the required actions from industry to facilitate delivery of the CCR project objective.

CCR Project

The core deliverables for this project are to:

- a) Reduce the number of CCRs by:
 - (i) Implementing one energy CCR (electricity and gas) and one water CCR.
 - (ii) Amalgamating the energy and water CCRs to create a single utility CCR across electricity, gas and water.
- b) Introduce a two-tiered structure (a medical tier and a needs-based tier) to the energy CCR, which will then be the basis for the single utility CCR.

The implementation of these deliverables will significantly improve the customer experience for consumers in vulnerable circumstances and will ultimately make it easier for these consumers to access the services that they need.

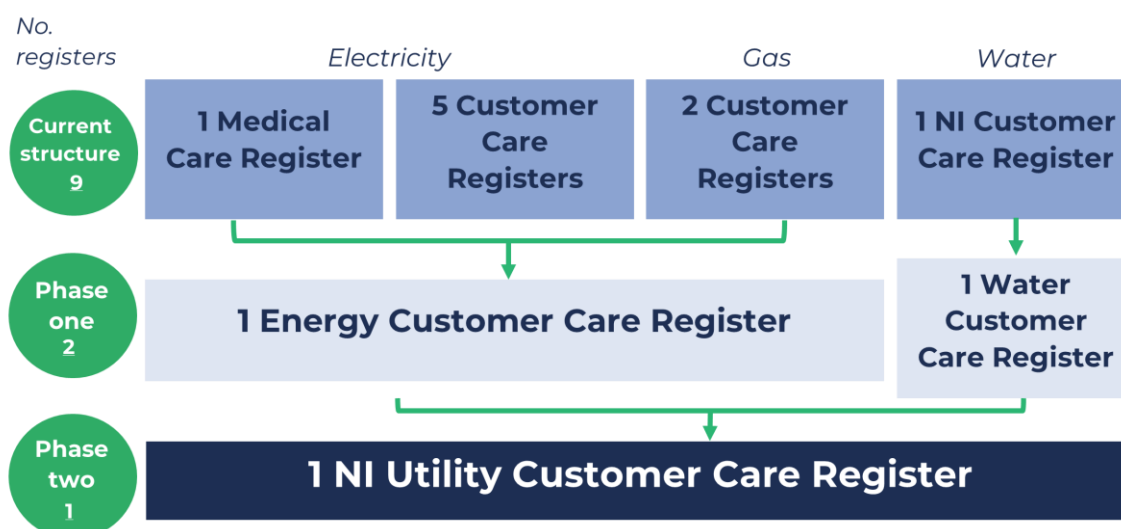
Deliverables

The creation of a single utility CCR will reduce the number of CCRs from nine (across electricity, gas and water) to a single CCR (for all domestic electricity and gas suppliers and DNOs and NI Water).

The CCR project will be delivered over two phases:

1. During Phase 1 the CCRs will be reduced from nine down to two comprising a single energy (gas and electricity) CCR, alongside the water CCR (two in total).
2. During Phase 2, these will be amalgamated to a single CCR for all utility consumers in Northern Ireland.

Figure 1: Reducing the number of CCRs over two phases



Each phase will be delivered across three stages: development, implementation and management.

The energy CCR (and the single utility CCR) will be two-tiered consisting of a medical care tier and a needs-based tier. These tiers are defined below.

Figure 2: Medical and Needs-Based tiers – eligibility and provisions

Medical Care	<p>Consumers who rely on electricity for healthcare needs (such as a dialysis machine, feeding systems or lifting equipment) and those who have a terminal illness.</p> <p>Those on the medical care tier will receive prioritisation of contact during interruptions to supply. They will also be eligible to receive the services and protections available to those on the needs-based tier.</p>
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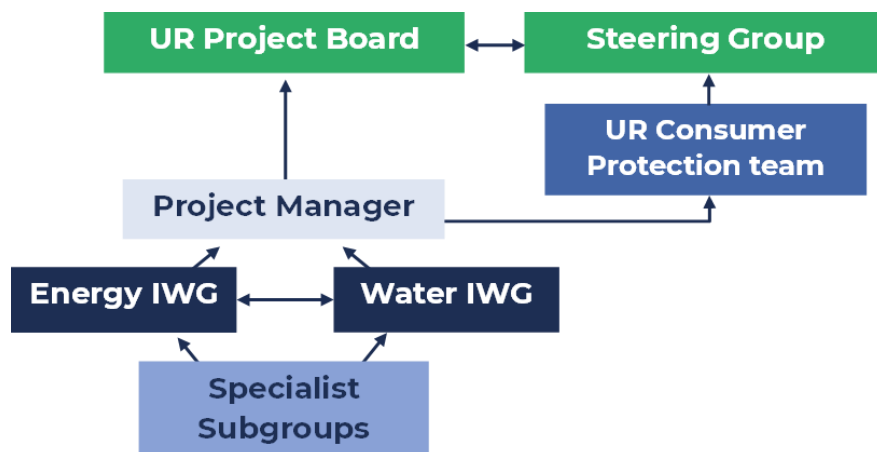
Needs-Based	<p>All consumers who are covered under the new vulnerability definition.</p> <p>Within this tier, the primary focus will be on recording the consumer's individual support needs (the specific support that they require) rather than a specific vulnerability, disability or illness. Those on the needs-based tier will only receive the supports that they require due to their specific vulnerability.</p>
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The water CCR will remain as a single tiered CCR during Phase 1 and needs-based recording will not be introduced for water during this phase. The water CCR will then merge into the energy CCR in Phase 2.

Organisational Structure of the CCR Project

To deliver the CCR project there will be two industry working groups (IWGs) and a number of specialist subgroups, each with their own roles and responsibilities to ensure successful delivery of the project. This will be supported by a set organisational structure for the CCR project which sets out the reporting and management arrangements for each group.

Figure 3: Organisational Structure



Design principles

In developing and implementing the CCR project, there are three overarching design principles that we expect to be applied at all stages of the project. These are:

- Inclusive by design** - means designing out barriers-to-access that create exclusion, inequality and unfairness in markets. This should result in all

consumers being able to access the services that they need and will therefore provide the most benefit to consumers and to industry. The end user must be involved and considered throughout the entire process.

- b) **Secure by design**- means that the principles of data protection are considered and integrated into all data processing activities from the design stage and throughout the entire project.
- c) **Adaptable by design** - means meeting the current needs of vulnerable consumers, whilst also considering and safeguarding against potential future harms, and being adaptable to changes in the energy and water sectors.

Required actions to facilitate delivery

We have identified five core required actions that will facilitate delivery of the CCR project. These actions will be completed or facilitated by the IWGs. The purpose of these groups is solely to develop, implement and manage the CCR project. There will be one IWG for energy (electricity and gas) and one IWG for water. The two IWGs are required to work collaboratively to implement the CCR project and work to complete the following actions.

- a) **Development of a project plan** - UR will procure a project manager (PM) to support industry in the delivery of the CCR project. The PM, with the assistance from the IWGs, will develop a project plan for Phase 1 of the CCR project. The project plan will include a high level timeline on when industry expect the CCRs in Phase 1 to be implemented, the key stages of development and implementation and key activities to be delivered at each stage of development.
- b) **Development of industry procedures** - To support the implementation and maintenance of the CCRs we expect IWGs to develop industry procedures for the CCR project. The industry procedures will set out the roles and responsibilities of each company and will ensure correct and consistent processes and practices across industry.
- c) **Development of standardised needs-based categories** - The IWGs will develop the needs-based categories to be used in the needs-based tier. The primary focus of this tier is recording the customer's individual support needs rather than a specific vulnerability, disability or illness. The focus of this tier is 'what is the consumer vulnerable to' and what is the support they require.
- d) **Development of a standardised CCR sign-up form** - To support sign-up to the CCRs, industry will be required to develop a standardised and user-friendly CCR registration form to be used by all licensees. Development of a

standardised form along with standardised needs-based categories will facilitate a smoother and quicker transition to a single cross industry CCR in the longer term.

- e) **Development of a communications plan** - To support the delivery of CCR project and realise the full benefits to consumers, a communications plan will be developed for the project. This will fall under the IWGs as a communications workstream.

To ensure the successful delivery of the CCR project, IWGs must also engage with other relevant experts and stakeholders.

The CCR project is a priority project for UR and we will support and enable industry to deliver this project.

1. Introduction

Purpose of this document

- 1.1 On 22 June 2023 we published a Best Practice Framework (BPF) consultation paper¹ setting out our proposals on a new mandatory Code of Practice (CoP) for Consumers in Vulnerable Circumstances (which will be referred to as the 'Consultation' for the rest of this paper). The Consultation covered our proposed decisions on the CoP requirements, proposals on changes to the Customer Care Register (CCR) structure, proposals on the formation of industry working groups (IWGs) and our proposals on the implementation and monitoring of the CoP.
- 1.2 Proposed changes to the CCR structure in the Consultation were:
 - a) The development of industry level CCRs prior to implementing a single CCR across electricity, gas and water; and
 - b) The development of a two-tier CCR structure with the top tier being for medical care and the second being needs-based.
- 1.3 We identified that decisions on the proposed changes to the CCR structure would take longer to develop and to deliver than the implementation of the new CoP. To avoid delaying the introduction of the new CoP, we decided to separate the deliverables on changes to the CCR structure from the CoP to implement them as two distinct projects and to work in parallel.
- 1.4 A decision paper² on the responses and decisions linked to the CoP and its implementation was published on 27 March 2024. This paper follows on from the CoP decision paper and focuses on the changes to the CCR structure (which we now refer to as the CCR project).
- 1.5 The purpose of this information and decision paper is to:
 - Provide a summary of responses to the Consultation proposals on the CCR project.
 - Set out the overarching objective and core deliverables of the project.
 - Establish the stages of delivery of the CCR project.

¹ [UREGNI Best Practice Framework Proposals: Code of Practice for Consumers in Vulnerable Circumstances Consultation Paper](#)

² [UREGNI Best Practice Framework: UREGNI Best Practice Framework Proposals: Code of Practice for Consumers in Vulnerable Circumstances Decision Paper](#)

- Set out the organisational structure for the CCR project delivery.
- Establish the overarching design principles that we expect industry to apply throughout the CCR project.
- Set out the required actions for industry to facilitate delivery of the CCR project.

Background

The Best Practice Framework

- 1.6 The BPF establishes best practice principles and measures which all domestic utility suppliers and Distribution Network Operators (DNOs)³ in Northern Ireland should implement to better identify, support and protect consumers in vulnerable circumstances.
- 1.7 The main deliverables of the BPF programme across the three regulated industries (electricity, gas and water) are:
- a) The introduction of a new wider vulnerability definition into licences.
 - b) The implementation of a new mandatory Code of Practice (CoP) for Consumers in Vulnerable Circumstances.
 - c) Changes to the CCR structure to reduce the number of CCRs across industry (with the overall aim of implementing a single CCR across industry) and to introduce a two-tiered structure (a medical tier and a needs-based tier).
- 1.8 The first two BPF deliverables have been completed following their introduction into licences on 25 November 2024. The CCR project builds upon these to ensure that consumers who require extra help are on the CCRs and are receiving the appropriate supports.

Definition of vulnerable

- 1.9 The wider definition of vulnerable/vulnerability recognises that any consumer could be considered vulnerable given a particular set of circumstances, and that vulnerability is not necessarily a permanent characteristic.

³ Where reference is made to DNOs within this paper, this may refer to one or more of the following – NIE Networks (the electricity DNO), Phoenix Energy, Kinecx Energy and Evolve (the gas distribution networks) and Northern Ireland Water (dual role of network and supply).

‘A consumer is deemed vulnerable when their personal characteristics or circumstances reduce their ability to engage effectively and achieve fair outcomes. A vulnerable consumer is significantly less able to protect or represent their interests and significantly more likely to suffer detrimental impacts on their health, wellbeing or finances.’

- 1.10 The introduction of the new wider definition of vulnerability ensures that any domestic consumer who requires additional support because of their characteristics or circumstances, will be eligible to sign up to the CCRs and to avail of the additional services offered by their supplier or DNO.

Code of Practice for Consumers in Vulnerable Circumstances

- 1.11 The new CoP ensures that the support and protections offered to Northern Ireland’s electricity, gas and water consumers are consistent, adequately promoted and reflective of best practice exemplars seen in Great Britain and across other regulated sectors.
- 1.12 The CoP contains requirements specific to the CCRs including more frequent contact of consumers on CCRs to ensure they are receiving appropriate supports for their needs and improved promotion of CCRs.
- 1.13 The required measures in the CoP currently apply to the existing CCRs and CCR holders. When the changes to the CCR structure are implemented (to introduce the energy CCR then the single CCR), the measures will apply to the customer care register(s) and customer care register holder(s) at that time.

Consultation process

- 1.14 The Consultation received 18 responses, with representations from industry (suppliers and DNOs of water, electricity and gas) and consumer bodies. Consultation responses were published alongside the decision paper on the new CoP in March 2024⁴.
- 1.15 A summary of stakeholder feedback in relation to the new CoP was set out in the CoP decision paper. A high level overview of responses to the CCR project was also included in the paper⁵.
- 1.16 In the CoP decision paper, we noted that we would publish a separate Information Paper on the CCR project in which we would set out the detailed responses to the CCR proposals and provide more information on our expectations for this project and timelines for delivery.

⁴ [Consultation responses to the Code of Practice for Consumers in Vulnerable Circumstances | Utility Regulator](#)

⁵ [Best Practice Framework decision - Code of Practice for Consumers in Vulnerable Circumstances - March 2024 | Utility Regulator](#)

- 1.17 On 29 April 2025 we held an Industry Session on the CCR project. This was attended by representatives across the electricity, gas and water industries and the Consumer Council for Northern Ireland (the Consumer Council). During this session we outlined our key proposals for the CCR project and sought feedback from attendees on these. We also received a number of further written responses and held follow-up meetings with various stakeholders on the CCR proposals. We have used the feedback received in the industry session and subsequent written and verbal feedback to further define the CCR project.

Structure of the paper

- 1.18 This paper will cover the key areas where we sought responses from stakeholders in the Consultation on the proposals for the CCR project. The paper will outline the responses received, our comments on each and our final decision.
- 1.19 We have summarised the responses to the Consultation rather than detail every comment and respond to each one individually. As a result, we have included those comments that are most significant or opinions that have been shared by a number of respondents. We thank all our stakeholders again for their engagement throughout the development of the new CCR structure and as we move forward into the CCR project.
- 1.20 This paper sets out the requirements of the CCR project including:
- The overarching objective and core deliverables;
 - Role and formation of industry working groups (IWGs) and required IWG actions to facilitate delivery;
 - Delivery stages of the CCR project;
 - Organisational structure for delivery of the CCR project; and
 - The overarching design principles that should be followed by industry in developing and implementing the CCR project.
- 1.21 This paper contains the following chapters:
- Chapter 2 Provides a summary of stakeholder responses to the Consultation proposals on the new CCR structure and how UR have considered these responses to inform our decisions.
- Chapter 3 Sets out the overarching objective and core deliverables of the CCR project.
- Chapter 4 Sets out the stages for delivering the CCR project.

- Chapter 5 Sets out the organisational structure of the CCR project including roles and responsibilities.
- Chapter 6 Sets out our expectations on the overarching design principles that we require industry to apply throughout the CCR project.
- Chapter 7 Sets out the required actions to facilitate the delivery of the CCR project.
- Chapter 8 Sets out our next steps for the CCR project.

Equality considerations

- 1.22 Section 75 of the Northern Ireland Act 1998 places a number of obligations on public authorities concerning the promotion of equality of opportunity and regard to the desirability of promoting good relations between different categories. We aim to promote equality of opportunity:
- Between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
 - Between men and women generally;
 - Between persons with a disability and persons without; and
 - Between persons with dependants and persons without.
- 1.23 In the Consultation we requested that respondents commented on the overall equality impact of the proposals. Those who provided a response to this agreed that foreseeable impacts of the proposals would be positive for equality considerations.
- 1.24 We have undertaken a Section 75 screening of the original proposals as set out in the 'Approach' document and reviewed all Consultation responses as part of the development of this decision paper. We consider that the CCR project will benefit all domestic consumers and we do not anticipate any negative impacts on any groups.

2. Consultation feedback

Introduction

- 2.1 In the CoP decision paper, we provided a high level overview of the stakeholder responses related to the CCR project and stated that we would provide a more detailed response to the consultation feedback in this paper. This chapter sets out our BPF proposals on the CCRs from the Consultation and summarises stakeholder responses. UR's response to stakeholder feedback and decisions are set out for each of the areas that we consulted on.

Establishing a single CCR across industry

- 2.2 In the Consultation, we proposed to reduce the number of CCRs to three separate industry level CCRs (one for electricity, gas and water), which in the future will be amalgamated to one single CCR for all utility consumers in Northern Ireland.

Stakeholder feedback

- 2.3 There was broad support from both industry and consumer groups for streamlining the CCRs to a single joint utility register.
- 2.4 Benefits noted included removing the burden from the consumer to register across multiple CCRs, simplifying the registration process and the potential efficiencies of streamlining record keeping across industry.
- 2.5 Examples of existing good practice were provided such as the 'Tell Us Once' scheme operational in England, Scotland and Wales to register a death across Government organisations, and data sharing agreements between energy and water companies in GB.
- 2.6 Gas DNOs supported moving directly to a single CCR, rather than developing three interim industry level CCRs. They noted that as gas DNOs do not currently hold CCRs, creating a gas industry CCR would require a large amount of resources which they viewed would be better directed to deliver the single utility CCR.

UR response and decision

- 2.7 We welcome the support for streamlining the CCRs to a single utility CCR in a single step. We recommended an interim solution of three industry level CCRs (for electricity, gas and water) in the Consultation as we considered industry CCRs could potentially be implemented quicker than

a single utility CCR, enabling benefits to be delivered at an earlier stage and to ease the transition for industry.

- 2.8 Based on industry feedback, we now consider that rather than first implementing three industry level CCRs, implementation of a single energy CCR alongside the water CCR would be more beneficial for both consumers and industry. The water CCR will then be merged into the energy CCR to form the single CCR.
- 2.9 We note and thank the respondent for providing examples of registers they consider to be good practice and encourage IWGs to consider these when developing and implementing the CCR.

CCR Owner

- 2.10 We proposed that each CCR be held and maintained by one organisation. We suggested that the CCRs be held at DNO level. We explained that we were open to alternative suggestions or proposals from companies who wish to volunteer to hold the CCR for their particular industry.

Stakeholder feedback

- 2.11 Two industry respondents considered that UR should mandate who would hold the CCR. These respondents were both of the opinion that the CCR should be held by the electricity DNO as they already hold centralised information on all households in Northern Ireland.
- 2.12 A consumer body proposed the CCR be held by a not-for-profit entity or social enterprise provider.

UR response and decision

- 2.13 We have not mandated which licensee should hold the CCR, but consider that a member of industry would be best placed to hold it as it will be industry who will be designing and implementing the CCR project.
- 2.14 NIE Networks have been supportive of the project and have agreed to hold the CCR register (this will initially be the energy CCR in Phase 1 and then the single utility CCR in Phase 2).
- 2.15 NI Water will continue to hold the water CCR, with this function moving to NIE Networks when the energy and water CCRs are amalgamated into a single utility register.
- 2.16 Whilst the CCR will not be held by a not-for-profit entity or social enterprise provider, we recognise the considerable supporting value that these bodies and other sectors can provide to the project. This includes their role in signposting consumers to the CCRs to ensure that they are

receiving appropriate supports. We encourage IWGs to collaborate with not for profit entities, social enterprise providers or other relevant bodies or sectors (for example health) to assist in referring relevant individuals to the CCR.

Implementation of a two-tiered CCR

2.17 In the Consultation, we proposed to make the CCRs two-tiered:

- **Tier 1 – Medical care tier** - for consumers who rely on utilities for medical and healthcare needs. These consumers would also be eligible for all the services and protections available to those in the needs-based tier.
- **Tier 2 – Needs-based Tier** - for consumers who are covered under the vulnerability definition. Companies will record the additional services that the consumer requires as a result of their vulnerability. In essence they will therefore be recording the needs of the consumer.

Stakeholder feedback

2.18 There was broad support from respondents for the two-tiered approach. However, there were some concerns on the specifics of the needs-based tier and how it would operate and some comments on the medical care tier. These are set out under the relevant headings below.

UR response and decision

2.19 We welcome the support for the two-tiered approach. We will be implementing this approach.

2.20 We received some specific feedback on each of the tiers and queries on how they would operate. We address these below.

Medical Care tier

2.21 An industry respondent stated that having a medically dependent register is essential as such customers need to be easily identifiable and contactable in times of crisis, specifically in times of an outage. The respondent stated that this will require DNOs to have access to two registers, and their staff to be able to differentiate between the two tiers.

2.22 A consumer group asked UR to consider that all terminally ill people should be automatically categorised as 'highest risk' (for inclusion in the medical tier) even where medical equipment is not being used due to the life limiting nature of their condition. It was also noted that individuals living with progressive conditions such as cancer, dementia or motor

neurone disease, will spend more time in the home, be more susceptible to the effects of the cold, and would need their homes to be heated for longer periods while being more vulnerable to even short periods of time without the heating working correctly.

- 2.23 A gas DNO considered that there should be no requirement for a gas medical care tier as they considered the medical care tier is designed for those relying on electricity for their healthcare needs.

UR response and decision

- 2.24 We welcome the support for a having a medical care level register that is separate from the needs-based register.
- 2.25 The current provision of NIE Network's medical care register is contact prioritisation to receive up to date information by the phone during a power cut or planned interruption to supply (for those who rely on electricity for healthcare needs)⁶. Contact prioritisation will remain a key provision of the medical tier in the new CCR.
- 2.26 We are requiring the medical care tier to continue the service provision of NIE Network's medical care register and for eligibility to continue to include those who rely on electricity for their health care needs.
- 2.27 We consider that there would be benefit in expanding the medical care tier to also include those who rely on gas or water for their health, for example individuals who may be more sensitive to the cold or who have additional water requirements for washing due to a medical condition. However, we have not come to a decision on whether to expand the applicability of the medical care tier yet.
- 2.28 We expect industry, through the IWGs, to explore this further to determine what the medical tier could offer to those reliant on either gas or water for their health needs and to determine if it would be of value to expand the medical care tier. This would include determining what the medical tier could offer these consumers, the risks if they are not recorded on a medical tier and how prioritisation would work across different scenarios. We require industry, through the IWGs, to bring their recommendations and reasons on this to UR for decision. The process for this is set out in Chapter 5.
- 2.29 We agree that individuals with a terminal illness should be included in the medical care tier register and have clarified this in the CCR deliverables.

⁶ [Critical Care register for customers with life supporting equipment | Northern Ireland Electricity Networks](#)

Needs-Based tier

2.30 We received feedback on various aspects of the needs-based tier covering the following areas:

- Implementing a needs-based tier will involve significant changes to how industry have been registering customers.
- The need to establish a consistent service list for the single CCR to avoid any issues during a Change of Supplier process.
- Some industry respondents stated that whilst they support a needs-based CCR, they are of the opinion that the individual vulnerability will still need to be recorded so that companies can discuss with their consumers the relevant services they can offer to accommodate their needs.
- An industry respondent sought clarification on whether suppliers/DNOs should request any proof of the relevant vulnerability or if UR deem it appropriate to accept a customer's disclosure of a vulnerability at face value.
- One industry respondent expressed that an approach which matches each needs-based category with an appropriate service, undermines a company's ability to consider each consumer's specific needs individually and to adjust services accordingly. A 'special consideration' category was proposed to allow more flexibility as a good basis for the needs-based tier, rather than consumers selecting the additional services they require from a predefined list.
- That the current customer opt-in model for registers must be replicated on any IT solution as suppliers cannot be responsible for assuming vulnerabilities on behalf of customers.
- Concerns on who would be eligible for the needs-based tier of the CCR and on maintaining the accuracy of records for those with transient vulnerabilities.
- That the de-registration of consumers experiencing transient registration had not been adequately addressed.
- An industry respondent considered that the additional services offered to an individual with a transient vulnerability should be limited, providing the example that they consider it would not be appropriate to relocate a meter for such a customer as they consider this service would require a consumer to be identified as having a fixed vulnerability.

- 2.31 The Information Commissioner's Office (ICO) supported the provision of a requirement in the new CoP to conduct a data cleanse of CCRs. However, they questioned the timing of every two years as they considered some types of vulnerability could change at a faster rate which could result in inaccurate data being held on the CCR and some individuals being on the CCR when they no longer need to be. The ICO strongly recommended introducing processes for flagging individuals who would require more frequent review as a means of maintaining the accuracy of records. The ICO further recommended that measure 4.3 in the CoP (requirement for CCR holders to conduct a data cleanse every two years), should be subject to review.

UR response and decision

- 2.32 We recognise that the development of the needs-based tier (to include the needs-based service list) will be a complex process that will require considerable time and resource allocation to ensure it is appropriately developed to suit the needs of the end users.
- 2.33 To help navigate the evident complexities and allow proper detailed consideration Industry Working Groups (IWGs) will be established to develop, implement and maintain the new CCR structure. Our decisions on the IWGs are set in in the next section of this chapter.
- 2.34 In the spirit of requiring the adoption of inclusive design principles in developing the CCR (see Chapter 6), we expect the IWGs to engage with relevant stakeholders. We recommend that industry explore existing guidance on recording support needs, for example guidance from Money Advice Trust, What We Need and Experian Support Hub⁷, and for the experiences and perspectives of end users to be demonstrably used in the development, design and finalisation of the new two-tiered structure.
- 2.35 In line with this approach we will not, at this stage, be overly prescriptive in the specifics of the CCRs and the two-tier approach. We have set out below certain aspects that we require in the final design or that we expect the IWGs to be able to evidence full consideration of. We will keep this under review and may choose to mandate certain features of the two-tiered CCR approach if needed. We will work closely with the IWGs to try to avoid mandatory measures.
- 2.36 A consistent set of need-based services will be required (the service list) across the CCRs. This will be developed by the IWGs. This will facilitate:

⁷ Money Advice Trust and What We Need (2025) [What support can firms give disabled consumers and people in vulnerable situations guide](#)
 What We Need [Support Needs Lists – What We Need](#)
 Experian Support Hub [Support Hub - All Support Need](#)

- A single, standardised sign-up process (based on the ‘tell us once’ approach);
 - Ensure consistency and accuracy across utility companies in recognising and recording the needs of consumers; and
 - A smooth transition when moving to a single CCR.
- 2.37 We do not require companies to assume vulnerabilities on behalf of customers. We agree that industry will not know if a consumer is vulnerable and what their specific needs are unless the consumer communicates this with the company. However, the full responsibility of signing up to the CCR cannot be left to individuals who may not be aware of additional services or face barriers to signing up. The CoP for Consumers in Vulnerable Circumstances places requirements on companies to better identify consumers in vulnerable circumstances and/or those who may be eligible for the CCR. Furthermore, in following the principles and required measures in the CoP, companies should also provide opportunities and facilitate an environment where consumers are encouraged to disclose any vulnerability.
- 2.38 For a customer to be added to the CCR, they do not need to provide proof of their relevant vulnerability. Companies should accept a customer’s disclosure of a vulnerability at face value. Placing a requirement on consumers to provide proof of vulnerability would put an additional burden on consumers and could act as a barrier to signing up to the CCR.
- 2.39 We recognise that for individuals with transient vulnerabilities some additional services may not be proportionate to provide due to the short-term nature of their vulnerability. Companies should consider consumers with a vulnerability on an individual basis to determine the service that best suits their needs. If additional support is needed for a short period of time, then it may be more proportionate to offer the individual an alternative service that would provide the same outcome. However, if an alternative service cannot be provided then the standard service should be offered to the consumer regardless of the expected timeframe of their vulnerability.
- 2.40 We recognise that the needs of individuals on the CCR who have a transient vulnerability may be more likely to change resulting in the individual no longer requiring to be on the CCR or their details needing to be updated. We agree that it is important for the CCR to accurately reflect the needs of the individuals on the register(s). We are of the opinion that this will be achieved through the requirements in the CoP for Consumers in Vulnerable Circumstances for the CCR holder to contact all CCR consumers and conduct a data cleanse at least every two years (required measures 4.3 and 4.4).

- 2.41 We set out in our decision paper on the new CoP that contacting those on the CCR every two years is a minimum, therefore for customers whose vulnerability is transient, companies may contact such individuals on a more frequent basis. This could be a prescribed timeline (such as a year after initial contact) or based on feedback from the customer at the time of the initial contact. However, we recognise the resource cost of more frequent contact, so we are not requiring companies to make more frequent contact than the two years minimum requirement in the CoP.
- 2.42 Regardless of the frequency of contact that is deemed to be appropriate, removal of consumers should only take place if the consumer explicitly states that they would like to be removed from the CCR.

Industry Working Groups

- 2.43 We proposed that the new CCR structure should be developed, implemented and maintained via IWGs.

Stakeholder feedback

- 2.44 Industry respondents requested further clarification on the formation, membership, operation and organisational roles and responsibilities of the proposed IWGs.
- 2.45 A supplier sought for the UR to mandate more aspects of to the CCR project, specifically on how the IWGs will function and operate, for example mandating who should take the lead role with regards to holding customer information. This respondent considered that if a number of aspects are not mandated, it could result in delays in the IWGs establishing and making decisions. This was supported by another supplier who also sought for UR to have a stronger leading role in the IWGs.
- 2.46 A DNO stated that significant collaboration will be required both within the specific IWGs and across the IWGs to ensure the needs-based categories for the CCR that are developed are interoperable.

UR response and decision

- 2.47 Two IWGs will be established – an energy IWG and a water IWG. NIE Networks will lead the energy IWG and NI Water will lead the water IWG.
- 2.48 UR will be a member of both IWGs. We will procure a Project Manager (PM) to support the establishment of the IWGs, develop a project plan with the IWGs, manage delivery of this plan and monitor progress for each IWG against the project plan. More information on the role of the PM is provided in Chapter 5.

- 2.49 We recognise that due to a lack of clarity on certain aspects of the CCR project the IWGs have not been established. To provide further clarity we met with industry on 29 April 2025. With the information provided through this session and in this paper, we would encourage and expect industry to begin preparing for the IWGs following publication of this paper.
- 2.50 The implementation of the CoP for Consumers in Vulnerable Circumstances already places a number of requirements on industry specific to the CCRs. In relation to the operation of the IWGs, if UR considers the IWGs are not making enough progress or are not operating effectively then we may review the role we have in the IWGs, which may include mandating additional aspects. The PM will monitor and report on progress against the agreed project plans. We will require monthly reports (in line with UR's project management framework) on progress against the project plan (to include key decisions, actions taken and next steps). This is set out in Chapter 7.
- 2.51 We agree that collaboration across IWGs is essential to the success of this project including the standardisation of processes and working towards the implementation of the core deliverables.

Industry Procedures

- 2.52 Within the Consultation, we proposed the establishment of industry procedures for the implementation of the new CoP. We did not propose the establishment of industry procedures for the implementation of changes to the CCR structure at the time of the Consultation⁸.

Stakeholder feedback

- 2.53 The majority of gas industry respondents considered the role of the IWGs should be to facilitate industry to deliver a CCR structure which is fit for purpose. This would be through developing plans and setting out the procedures and practices to be followed by each Licensee to establish and maintain the new industry level CCRs.

⁸ Within our final decision paper on the CoP for Consumers in Vulnerable Circumstances, we set out that we would no longer require industry procedures for the implementation on the new CoP. We decided that we required industry to establish industry working groups to facilitate the development, implementation and maintenance of changes to the CCR structure (including processes for the inputting and sharing of data via a data sharing methodology across and within the industry groups).

[Best Practice Framework decision - Code of Practice for Consumers in Vulnerable Circumstances - March 2024 | Utility Regulator](#)

- 2.54 Responses from electricity and water industry respondents stated no preference either for or against having industry procedures for the development and operation of new industry level CCRs.
- 2.55 A DNO sought for industry procedures for the CCR project to set out the procedures and practices to be followed by each Licensee to establish and maintain the new industry level CCRs. They noted that this process will require relevant Licensees to work with each other to deliver positive outcomes for consumers so considered it was an appropriate focus for the IWGs.
- 2.56 Another DNO sought clarity on the industry procedures to be developed in the IWGs and UR's role in this. They also sought to understand Licence impacts if initial working procedures are not agreed and implemented.
- 2.57 A DNO stated that consideration will be required on whether specific industry Accession agreements (similar to Market Registration Accession Agreements) will need to be drafted for existing and any new suppliers entering the market or if it is assumed that this system will be classified as a retail market system and will fall into the remit of the Market Registration Code when implemented. The agreements will ensure that all suppliers agree to adhere to the industry procedures.

UR response and decision

- 2.58 We confirm we will require the IWGs to develop industry procedures for the CCR project.
- 2.59 These industry procedures will set out the roles and responsibilities of each company and the processes and procedures each company will have to sign up to. The procedures will be applicable to the implementation and ongoing operation of the CCRs.
- 2.60 UR will review and approve the industry procedures before they are finalised. Once finalised, compliance with the procedures will be added to the relevant licence requirements⁹. This will ensure all applicable industry, and any new entrants, will have to follow and meet the required industry procedures for the CCR project. This is further set out in Chapter 7.
- 2.61 The need for specific Industry Accession Agreements for the CCR should be discussed by the IWGs and progressed through relevant fora. Whether these are required, and if so, what should be included in them, will become clearer as the CCR project is being progressed through the IWGs. Therefore, at this stage of the project we are not mandating these.

⁹ Following the statutory licence consultation process.

Design Considerations

- 2.62 While we did not consult on design principles, the importance of involving users and consideration of data protection issues were raised by several respondents.

Stakeholder feedback

- 2.63 A key theme emerging from consumer body responses was to ensure the CCR structure that is developed is suitable for the needs of the consumers it will be serving. It was raised by one consumer body that the IWGs should seek out the views of relevant stakeholders when developing the needs-based tier. Another consumer representative felt that focus should be placed on communication and simplicity for users. They noted that it is important for people to know there is a register, if are they on it and that the sign-up process is simple and user friendly. A consumer body also noted the need for focused effort on making vulnerable customers aware of the additional supports that energy companies can provide through the CCRs.
- 2.64 A consumer body noted the complexities of establishing data sharing protocols and how the sensitivities and need for data protection measures for consumer data will require careful and detailed consideration. An industry respondent expressed concerns on potentially holding information in relation to consumers where they do not have a legal basis to do so. They therefore sought that UR share details of the engagement they have had with ICO.

UR response and decision

- 2.65 It is important in designing the CCR that the consumer is kept as the central focus to ensure that the CCR works for those who it has been developed for.
- 2.66 We agree with the feedback that the process for the consumer to sign-up to the CCR must be straightforward and accessible and that it should be clear to the consumer what benefits inclusion on the CCR will provide for them. We agree that the IWGs should seek out the views of relevant stakeholders in development of the CCR. We can support IWGs in this by facilitating the attendance of relevant stakeholders at IWG meetings. We will also require industry to involve users in the development of the CCR to ensure a consumer centric design.
- 2.67 We agree that data protection issues will require careful and detailed consideration. Data protection principles should be baked into the CCR project from the outset. We have been actively engaging with the ICO and will continue to engage with the ICO throughout this project. The ICO

has agreed to attend the IWGs to advise on data protection issues. We can also take any relevant questions raised at the IWGs to the ICO for consideration. We also note that companies will be responsible for deciding their own lawful basis for processing data for the CCR. A guide to the UK GPDR data protection principles is linked below: [A guide to the data protection principles | ICO](#)

- 2.68 Chapter 6 sets out the overarching design principles that we expect IWGs to apply throughout all stages of the CCR project. These include inclusive design principles, secure by design and adaptability by design.

Timelines for implementation

- 2.69 We did not set out specific timelines for the implementation of the CCR project in the Consultation. However, several respondents raised the importance of factoring in adequate timelines for delivery, noting also the need to consider the scale of the project and resource requirements in developing these timelines.

Stakeholder feedback

- 2.70 A consumer body sought for UR to set deadlines for the development and implementation of the CCR to ensure progress is maintained.
- 2.71 Industry respondents stated that the CCR development and implementation will be a significant undertaking requiring a detailed review of existing systems, the implementation of a new system and additional resources. It was stated that companies will need to understand the current data sharing arrangements that are in place, develop new processes (for example between a DNO and the CCR holder), understand the system requirements, specify and develop system changes, and ensure the necessary legal agreements are developed and implemented to support the new arrangements. It was proposed by an industry respondent that these issues will need to be addressed through the IWGs to ensure all requirements are agreed and that an appropriate timeline for delivery can be developed.
- 2.72 An industry respondent sought for adequate timelines to be provided for developing the changes to the CCR structure to avoid the development and implementation being rushed. They noted that without time invested for appropriate and thorough testing, this could result in the CCR having poor processes, system design and governance which would negatively affect customers.

UR response and decision

- 2.73 We recognise the complexity and scale of the CCR project. It is recognised that developing and implementing the CCR project will involve a number of technical and systems changes. We understand that industry have the best knowledge on how their systems work, the time it will take for systems to change or update and how long it will take to provide any relevant training. Therefore, we are not setting out a timeline for development and implementation of the CCR at this stage. Rather we will procure a PM to develop a project plan for the CCR project which will include mapping out timelines for implementation. IWGs will be required to assist the PM in the development of this project plan (to include timelines). UR will then review the project plan before it is finalised. Further details are set out in Chapter 7.
- 2.74 We agree that time will need to be invested in thorough testing of the CCRs prior to implementation. We will require IWGs to include consumer testing during their design of the CCR to ensure it suitable for the individuals it is intended to protect.
- 2.75 In developing the timelines within the project plan, IWGs should balance providing adequate time for thorough development and testing whilst ensuring that the benefits of the CCR can be released as soon as possible. Chapter 3 sets out the key benefits and also addresses challenges for the project, including resource requirements. Resourcing for price regulated companies is then addressed in Chapter 7.

Summary of UR decisions in response to Consultation feedback

- 2.76 The key decisions, requirements and clarifications based on feedback from the consultation are set out Table 1 below.

Table 1: Summary of UR decisions in response to Consultation feedback

Establishing a single CCR across industry
We will first reduce the number of CCRs from nine to two comprising one energy CCR (covering electricity and gas) and one water CCR in Phase 1. The water CCR will then be merged into the energy CCR in Phase 2 to form a single utility CCR.
CCR holder
NIE Networks has agreed to hold the shared CCR (this will initially be the energy CCR and then the single utility CCR).
NI Water will be the holder of the water CCR.

Medical Care Tier
The medical care tier will continue the service provision of NIE Network's medical care register.
We consider that there would be benefit in expanding the medical care tier to also include those who rely on gas or water for their health. We expect the IWGs to explore this further and require the IWGs to bring their recommendations and reasons on this to UR for decision.
Needs-based Tier
For the needs-based CCR a consistent list of services offered under the CCR will be required. This service list will be developed by the IWGs (energy and water).
We expect that the experiences and perspectives of end users will be used in the development, design and finalisation of the new two-tiered structure.
We encourage IWGs to explore guidance on recording support needs, for example guidance from Money Advice Trust, What We Need and Experian Support Hub.
Industry Working Groups
Two IWGs will be established – an energy IWG and a water IWG. NIE Networks will lead the energy IWG and NI Water will lead the water IWG.
UR will be a member of both IWGs. We will procure a Project Manager to support the establishment of the IWGs, develop a project plan with the IWGs, manage delivery of this plan and monitor progress for each IWG against the project plan.
If UR considers the IWGs are not making enough progress or are not operating effectively then we may review the role we have in the IWGs, which may include mandating additional aspects.
Industry Procedures
IWGs will be required to develop industry procedures for the CCR. These industry procedures will set out the roles and responsibilities of each company and the processes and procedures each company will have to sign up to, to ensure the smooth operation of the CCR is facilitated by all of industry. UR will review and approve the industry procedures before they are finalised. Once the industry procedures have been developed and finalised, compliance with these procedures will be added to the relevant licences as a licence requirement (following the statutory licence consultation process).
Design Considerations
Data protection principles and inclusive design should be baked into the CCR project from the outset and at all stages of delivery. The overarching design principles that we expect IWGs to apply throughout all stages of the CCR project are detailed in Chapter 6.

Timelines for implementation

We are not setting out a timeline for implementation of the CCR project at this stage. Rather we require that industry assist the PM in the development of a project plan for the CCR project which will include mapping out timelines for implementation. Timelines should incorporate time for thorough testing, including consumer testing.

Further decisions

- 2.77 Please note that this chapter does not cover all the decisions on the CCR project, only those that relate to the specific feedback in the consultation.
- 2.78 UR's full decisions on the CCR project including the key deliverables, required actions for implementation of the project and overarching design principles we expect to be applied, are set out in the subsequent chapters. Industry required actions for delivery of the CCR project are summarised in Table 2 (Chapter 7).

3. Overarching objective and core deliverables

- 3.1 The overarching objective of the CCR project is to create a single utility CCR across electricity, gas and water that meets the needs of vulnerable consumers so that they can overcome any barriers to accessing, using and benefiting from these essential services.
- 3.2 This chapter focuses on our expectations of the core deliverables for the CCR project to achieve this overarching objective. The chapter also outlines our foreseen benefits and challenges of each deliverable.
- 3.3 The core deliverables for this project are to be delivered over two phases.
- Phase 1 is to reduce the number of CCRs to two comprising one energy CCR (covering electricity and gas) and one water CCR. The energy CCR that is implemented will be a two-tiered structure (a medical tier and a needs-based tier), whilst the water CCR will remain as it currently is, so that it can be merged with energy CCR in Phase 2.
 - Phase 2 is to merge the water CCR into the energy CCR to create a single utility CCR that is two-tiered (a medical tier and a needs-based tier).
- 3.4 To achieve the core objective, we have identified a number of required actions that will facilitate delivery of the CCR project alongside three overarching design principles that should be embedded throughout the project. Further detail on the required actions and design principles is provided in Chapters 6 and 7.
- 3.5 Each phase of the CCR project will be delivered across three stages of development, implementation and management. Further detail on the main outputs and actions for each stage is provided in Chapter 4.

Single utility CCR

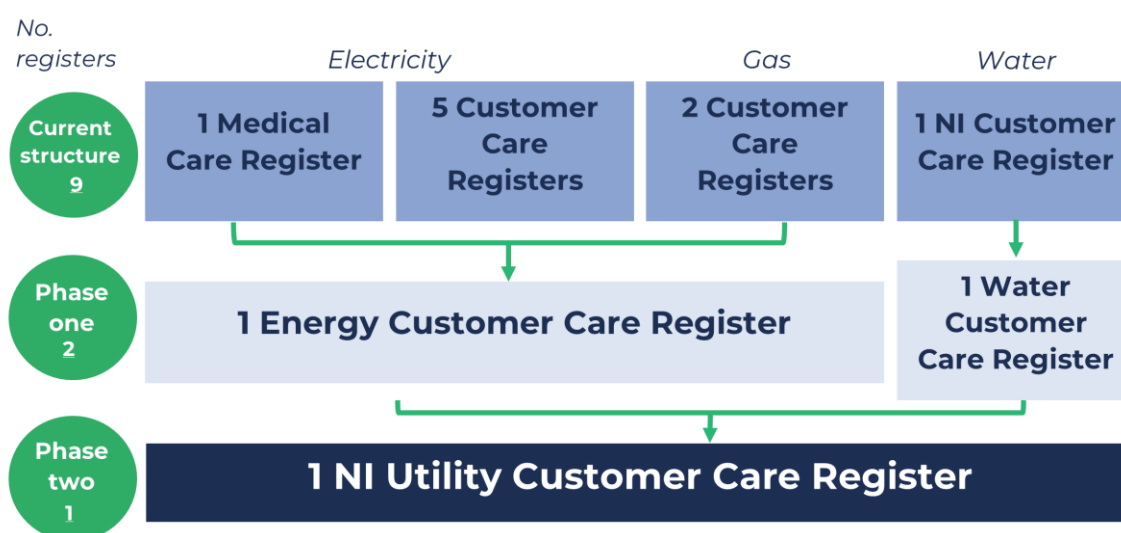
- 3.6 The creation of a single utility CCR¹⁰ will reduce the number of CCRs from nine (across electricity, gas and water) to a single CCR (for all domestic electricity and gas suppliers and DNOs and NI Water).

¹⁰ While we refer to the joint register as a 'Customer Care Register' within this paper. Industry may decide to use a different form of terminology to refer to the CCR when the changes are implemented.

What we expect

- 3.7 During Phase 1, the CCRs will first be reduced from nine registers down to two comprising a single energy (gas and electricity) CCR alongside the NI Water CCR. During Phase 2, the NI Water CCR will be amalgamated with the energy CCR to create a single CCR for all utility consumers in Northern Ireland.
- 3.8 Relevant information will be shared to and from the CCR holder and the other utility providers who are part of the shared CCR. The two IWGs (energy and water) will also engage with each other at regular and relevant points to assist the delivery of the CCR project (see Chapters 5 and 7).

Figure 4: Reducing the number of CCRs over two phases



Benefits of a reducing the number of CCRs

- 3.9 Within the current structure there is one medical care register and eight CCRs across the electricity, gas and water sectors. This means that a vulnerable consumer may need to sign up to four registers across electricity, gas and water to ensure that they receive the support and protections they need. In addition, each time they change supplier, they would need to register on the new supplier's CCR or else they would lose some of their protections and supports. The reduction in the number of CCRs to a single energy CCR and water CCR and then to a single utility CCR will deliver considerable benefits for both consumers and industry. These include:
- Reduce the burden on consumers of signing up to multiple registers and having to disclose information about their vulnerability and/or repeat their support needs on multiple occasions.

- Reduce the risk of consumers coming off CCRs and therefore losing protections and supports when they move supplier or into a different network area (gas).
- Streamline resources for industry through the sharing of information (where applicable) - suppliers will therefore be aware of the additional needs of switching customers who are already on the CCR.
- Improve the quality of data held by companies. All companies who are part of the shared CCR will have access to more accurate data as relevant updates made to customer information (for example change of contact details) will be shared.
- Simplify the process of promoting CCRs across industry and reduce confusion for consumers as signposting will be to a single register.

Challenges of creating a single utility CCR

- 3.10 Reducing the number of CCRs to a single utility CCR (along with Phase 1 to a single energy CCR and single water CCR) will be a complex task and will present a number of challenges. These challenges include:
- Aligning the current internal systems, processes and support provisions of nine separate CCRs into two CCRs (energy and water) prior to amalgamation into a single utility CCR.
 - Addressing data protection issues.
 - Time and resource requirements for industry.
 - Setting appropriate expectations for any customer signing up, so that they know what protections, supports and services they will (and will not) receive from each of their utility companies in signing up to the CCR.
 - Potential for consumer confusion, for example if they expect that all companies will be able to provide them with the same supports or confusion about as to why they are signing up to a register held by a company they do not have a direct relationship with.
- 3.11 Information on addressing these challenges is included at the end of this chapter of the paper.

Two-tiered CCR

- 3.12 The energy CCR and the single CCR will be two-tiered consisting of a medical care tier and a needs-based tier.

What we expect

3.13 Eligibility for each tier is summarised in Figure 5 below.

Figure 5: Medical and Needs-Based tiers – eligibility and provisions

Medical Care	<p>Consumers who rely on electricity for healthcare needs (such as a dialysis machine, feeding systems or lifting equipment) and those who have a terminal illness.</p> <p>Those on the medical care tier will receive prioritisation of contact during interruptions to supply. They will also be eligible to receive the services and protections available to those on the needs-based tier.</p>
Needs-Based	<p>All consumers who are covered under the new vulnerability definition.</p> <p>Within this tier, the primary focus will be on recording the consumer's individual support needs (the specific support that they require) rather than a specific vulnerability, disability or illness. Those on the needs-based tier will only receive the supports that they require due to their specific vulnerability.</p>

- 3.14 The medical care tier will be for individuals who rely on electricity for their healthcare needs (such as a dialysis machine, specialised mattresses, feeding systems, lifting equipment or medicines that must be refrigerated), and those who have a terminal illness.
- 3.15 Consumers in this tier will be eligible to receive the current protections that are provided by NIE Networks for customers on their medical care register¹¹. This is alongside the services and protections provided for vulnerable consumers through the CoP for Consumers in Vulnerable Circumstances.
- 3.16 The current protections that are provided by NIE Networks for customers on their medical care register are:

¹¹ [Critical Care register for customers with life supporting equipment | Northern Ireland Electricity Networks](#)
[MCCR registration form](#)
[Supporting vulnerable customers | Northern Ireland Electricity Networks - When you contact us](#)
[Supporting vulnerable customers | Northern Ireland Electricity Networks - When we come to your home](#)

- Customers on the MCR will receive regular up to date information by phone during a power cut or a planned interruption to their supply.
- MCR phone numbers will be prioritised on NIE Network's Customer Helpline.
- Alternative contact – can provide details of a relative or friend to contact if cannot be reached.
- In addition, further supports including alternative formats of communication and a password scheme are provided.

3.17 We consider that consumers who are eligible for the medical care tier have the highest risk of harm if they do not receive the additional protections provided through the medical care register. Due to the potential risk of serious harm to these individuals, it is important that they are registered on the medical care tier so that utility companies are able to identify these individuals in emergencies.

3.18 As set out under paragraph 2.27, we consider that there could be benefit in expanding the medical care tier to also include those who rely on gas or water for their health. However, we have not come to a decision on whether to expand the applicability of the medical care tier yet. We expect industry, through the IWGs, to explore this further.

3.19 The second tier will be needs-based and will be applicable to consumers who are covered under the recently implemented vulnerability definition and require additional assistance in certain areas. In this tier consumers do not receive all the additional protections, rather they receive the additional services that are relevant to their specific support needs. In essence those on the needs-based tier only receive the additional services that they require.

3.20 The development of standardised needs-based categories for the needs-based tier is one of the required actions to facilitate delivery of the CCR project. Explanation on what we expect from the standardised needs-based categories is provided in Chapter 7.

3.21 The two-tiered register will be implemented for the energy CCR during Phase 1. To avoid duplication of efforts, NI Water will not be required to develop a separate needs-based tier during Phase 1. The water CCR will remain as a single tiered CCR during Phase 1 and needs-based recording will not be introduced for water during this phase.

3.22 The current protections that are provided by NI Water for customers on their customer care register¹² include:

- Doorstep Service for customers with a hearing difficulty or mobility problems.
- Password identification scheme for NI Water's staff.
- Carers Contact Service – can nominate a carer or relative who can contact NI Water on their behalf, who NI Water can contact or who NI Water can post information directly to.
- Special Advice – if NI Water are unable to resolve any concerns by phone, they will arrange an appointment to visit the customer at their home.
- Information leaflets and letters are available in Braille, large print and on CD and audio tape.
- Prioritisation to provide bottled water (if do not have water).
- Prioritisation of response during flooding to ensure that NI Water are with the customer as quickly as possible.

3.23 While NI Water will not be implementing a needs-based tier during Phase 1, the water IWG will collaborate with the energy IWG in the development of the needs-based categories, standardised sign-up form, communications workstream and any other relevant workstreams to enable these processes to be easily amalgamated for the joint register in Phase 2. As several of the support services offered by NI Water (including the password scheme, information in alternative formats and a carers contact service) are also provided by gas and electricity companies, the needs-based categories for the energy register (which are common also to NI Water), should be developed in a way that enables these categories to be easily activated for NI Water when they merge into the energy CCR during Phase 2.

Benefits of making the CCR two-tiered

3.24 We consider the two-tiered CCR will deliver the following benefits for consumers and industry:

¹² [Customer Care Register - Northern Ireland Water](#)
[Customer Care Register leaflet - Northern Ireland Water](#)

- The medical care tier will ensure that consumers who are reliant on electricity for medical reasons (such as on life supporting machines or having a terminal illness) can be identified and prioritised for contact during interruptions to supply and emergencies¹³.
- The needs-based tier will ensure that consumers receive the appropriate support specific to their need(s). This approach recognises that consumers with the same condition or facing similar circumstances can have different support needs.
- By recording support needs, consumers on the CCR will see the direct benefit of being on the CCR as they will receive a service that meets their specific needs.
- Identifying specific supports will help manage expectations for consumers on what they will receive from signing up to the CCR.
- Companies will only need to provide the additional protections and services that are relevant and required by each individual consumer, rather than a blanket provision for all. This should allow companies to tailor their services and streamline their resources accordingly.
- Needs-based recording aligns with the UK General Data Protection Regulation (UK GDPR) principle of data minimisation¹⁴ as companies do not always have to gather sensitive health data to enable them to meet a consumer's support needs.

Challenges of making the CCR two-tiered

3.25 The development of a two-tiered CCR consisting of a medical care tier and a needs-based tier (with suitable needs-based categories) will present a number of challenges that will need to be considered:

- Identifying who is eligible for the medical tier.
- Aligning needs codes across industry taking into account different provisions across and within the three sectors.

¹³ As per paragraphs 2.27 and 2.28, we consider that there would be benefit in expanding the medical care tier to also include those who rely on gas or water for their health. We expect industry, through the IWGs, to explore this further to determine what the medical tier could offer to those reliant on either gas or water for their health needs and to determine if it would be of value to expand the medical care tier.

¹⁴ [Principle \(c\): Data minimisation | ICO](#)

- Identifying the appropriate needs-based categories to ensure that all provisions are covered, whilst not becoming so long of a list that it acts as a barrier to an individual signing up or recognising their need on the list.
- Reaching the right balance of encouraging those eligible for the CCR to sign up under the appropriate needs-based categories, whilst not having the needs-based tier appear a list of options of extra benefits an individual can choose irrespective of their specific needs.

Addressing the challenges

- 3.26 Streamlining the number of CCRs and introducing a two-tiered structure will be a complex and challenging task. However, we consider that these challenges can be mitigated by industry working collaboratively across suppliers and DNOs, between electricity, gas and water sectors and across the two IWGs (energy IWG and water IWG). UR will provide a supporting role and can facilitate bringing experts or relevant groups or individuals to the IWGs who may be able to assist with specific challenges. We anticipate that in adopting the high level design principles across the CCR project including inclusive design, secure by design and adaptability (set out later in the paper) that this should help address some of the challenges.
- 3.27 We will procure a PM who will be responsible for developing a project plan, managing the delivery of this plan, facilitating communications between the two IWGs and monitoring progress against the plan. Where issues are identified that could act as a barrier to the delivery of the project, UR will work with industry to identify and develop solutions to these challenges.
- 3.28 The PM will also be responsible for appraising the costs and benefits of the CCR project, along with the IWGs. More detailed costs in relation to resourcing of the CCR project (for example IT requirements and costs) will be explored as the project progresses, allowing further decisions to be made on the most efficient delivery of the CCR project. This exercise will begin once the project plan has been created and will be monitored throughout the development stage. The cost benefit appraisal will be used in developing the timelines for the CCR project, to balance enabling the benefits of the CCR project to be released as soon as possible, whilst ensuring the costs of doing so remain value for money for the consumer.

4. Stages of delivery

Introduction

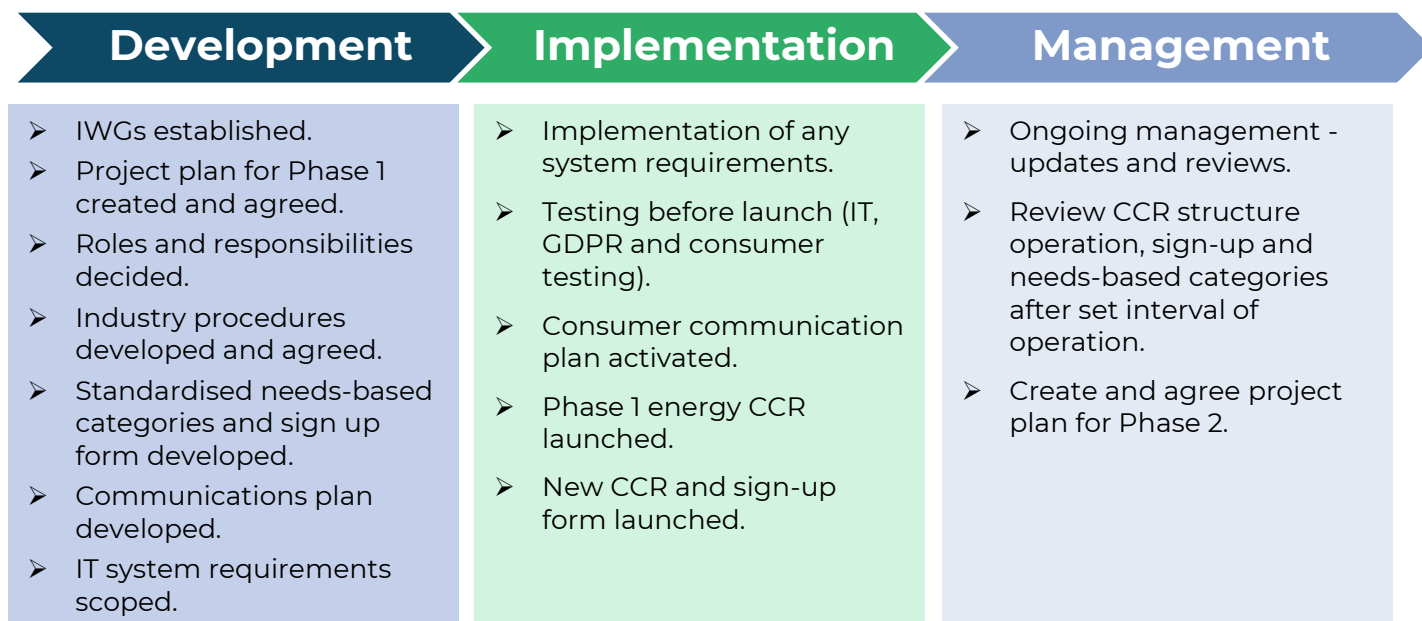
- 4.1 The CCR project will be delivered through two phases. Each phase will have three distinct stages, namely the development, implementation and management stages.

Figure 6: Delivery stages for each phase of the project



- 4.2 The Phase 1 management stage will overlap the Phase 2 development stage. The management of the energy CCR that will be implemented in Phase 1 will continue whilst Phase 2 work is conducted on developing the single utility CCR.
- 4.3 We consider that dividing each phase into three stages of delivery will assist the development of the project plan. The project plan will be a living document developed for Phase 1. A new project plan will subsequently be developed for Phase 2 following the implementation of the energy CCR.
- 4.4 We anticipate that at the outset of each phase, the timelines for the development stage can be mapped out with greater precision than those for the implementation and management stages. For the subsequent stages we expect a high level overview of key outputs should be developed, but the timelines and detail of these will be further established as the development stage progresses.
- 4.5 We have provided a high level overview of the main outputs and actions we expect will occur in the three stages for Phase 1, however, this is not an exhaustive list and is for guidance purposes only. We expect industry in assisting the PM in the development of the project plan for Phase 1 to consider the main actions and outputs that will be required in each stage and to add/amend to those we have provided in the overview below.

Figure 7: Phase 1 - Stages of delivery for the energy CCR and water CCR



Stage 1: Development

- 4.6 During the development stage the project plan will be created, roles and responsibilities will be decided, industry procedures will be agreed and licence modifications consulted on, the standardised needs-based categories and standardised sign-up form will be developed, a co-ordinated communications plan will be developed and the IT system requirements for the CCR will be scoped.

Stage 2: Implementation

- 4.7 The implementation stage is when the Phase 1 joint energy CCR (with two tiers) will be launched and become operational, alongside the water CCR. We foresee this will include the implementation of any IT system requirements, systems will be tested (including with end users) before launch and appropriate communications will be sent to consumers in advance of launching the new CCRs and sign-up forms (per the communications plan).

Stage 3: Management

- 4.8 The management stage will commence once the new CCRs are operational. This will include general maintenance such as updates and reviews and also a more formal review of the CCR structure operation, sign-up and needs-based categories after a set interval of operation (to be agreed within the IWG and UR). During this stage we expect the project plan for Phase 2 to be developed to map out in detail the actions and outputs required to achieve Phase 2 of the CCR project.

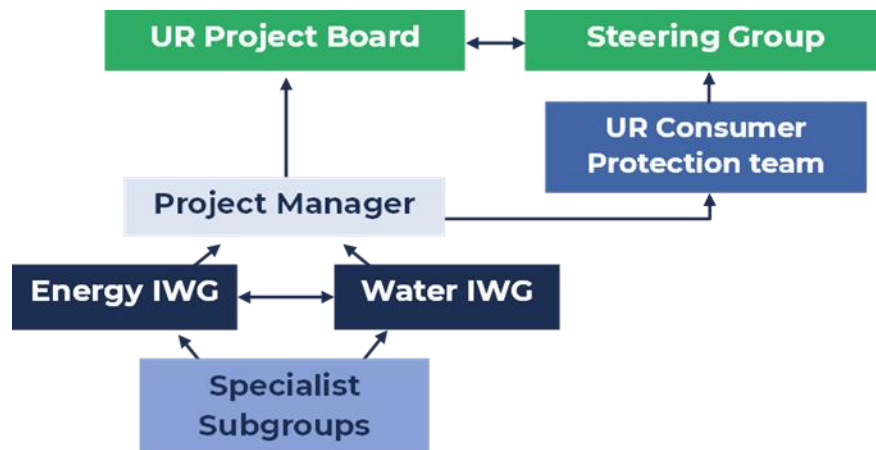
- 4.9 The overarching principles of inclusive design, secure by design and adaptability should be considered and applied at every stage of both phases. These principles are detailed in Chapter 6.
- 4.10 Further detail on the project plan is set out in Chapter 7.

5. Organisational structure of CCR project

Introduction

- 5.1 To deliver the CCR project a number of different groups will be established. Each will have specific roles and responsibilities in delivering the CCR project. This will be supported by a set organisational structure for the CCR project which sets out the governance structure and the reporting and managing arrangements for each group. This structure is outlined in the diagram below.

Figure 8: Organisational structure



Roles and responsibilities

UR Board

- 5.2 The UR Board will be responsible for any major strategic decisions in relation to the project. This will include decisions on mandating of requirements and approval of any necessary licence modifications. UR will report to Board on the status of the CCR project as part of ongoing updates to Board on the status of workstreams within the Consumer Protection Programme for 2024 to 2025 (CPP24).

UR Project Board

- 5.3 The role of the UR Project Board (URPB) is to provide oversight and to facilitate delivery of the CCR project. The URPB will also have decision making and approval responsibilities. If any major changes to the project or project plan are proposed at any stage, the PM will bring these to the UR Project Board for review and decision. The URPB will consist of UR

Senior Management and complies with the UR Project Management Framework (which aligns with the PRINCE2 (Projects IN Controlled Environments) methodology).

Steering Group

- 5.4 The role of the Steering Group is to provide oversight, strategic direction (to ensure the project aligns with the overarching objective) and guidance on specific workstreams and required actions. The Steering Group can make recommendations and guidance to the URPB. The Steering Group will meet quarterly and consist of a representative from each of the following organisations: UR (as Chair), the Consumer Council, the Energy IWG Chair, the Water IWG Chair and the Chair of the electricity Supplier Forum (and equivalent for gas suppliers). UR will establish the Steering Group following the establishment of the IWGs. A ToR will be developed for the Steering Group.

Project Manager

- 5.5 The role of the PM is to provide the day-to-day oversight and management of the CCR project in collaboration with the IWGs. The PM will be responsible for developing a comprehensive project plan for Phase 1 of the CCR project (which they will develop with the IWGs for approval by UR). They will also be responsible for planning, managing, monitoring and delivering the CCR project against the plan. Following agreement of the project plan, the PM will assign each stakeholder with their required actions and timelines to facilitate industry delivery of the CCR project. The PM will be responsible for providing progress reports and updates to the UR. The PM will also be responsible for appraising the costs and benefits of the CCR project, along with the IWGs.

IWGs

- 5.6 The IWGs will be responsible for the development, implementation and management of the CCR project delivery. They will help identify, establish and manage the subgroups that fall under the IWGs. IWGs will be responsible (both as a group, as part of subgroup workstreams and as individual stakeholders) to complete any actions assigned to them through the project plan and/or PM in the timeframe provided. NIE Networks will lead the energy IWG and NI Water will lead the water IWG. The IWGs will consist of one or two representatives from each company, a representative from the Consumer Council and a representative from UR (who will be a member in an observer capacity). The two IWGs will regularly communicate and work together on delivery of the CCR project. The PM will facilitate regular meetings with the IWGs in the development

and monitoring of the project plan. Further information on the IWGs is provided in Chapter 7.

Specialist Subgroups

The role of the specialist subgroups is to advise on and to support industry delivery of specific areas of the CCR project, such as communications, system design, industry engagement and data protection. The subgroups will fall under and be managed by the IWGs. They will be identified and developed as required by the IWGs, with support from the PM during the project plan design. Each subgroup will consist of specialists related to the function of the group. The specialists can be from across all companies, a number of companies or could be brought in externally either from another relevant organisation or procured by the companies. The IWGs (as managers of the subgroups) can decide this, alongside if members or representatives from subgroups will attend the IWG meetings.

UR Consumer Protection Team

- 5.7 The UR Consumer Protection (CP) team will provide oversight of the PM, attend the IWGs and report on project progress to the URPB and Steering Group. The PM can bring any issues or queries from the IWGs to the UR CP Team. The UR CP Team will support delivery of the CCR project by assisting in bringing in any relevant organisations or experts to the IWGs who could support or benefit the delivery of the CCR Project, for example this could include the ICO. The UR CP team will bring the PM progress reports to the URPB and provide updates on the CCR project to the UR Board as and when required.

Decision making responsibility

- 5.8 Any strategic or fundamental decisions should be brought by the PM and IWGs to the UR CP team. Depending on the nature of the issue raised, the CP team may then bring this to either the URPB or the UR Board for review and decision. In some cases, the CP team may be able to issue a decision. The UR CP team will report back to the PM and IWGs any decisions issued.
- 5.9 Smaller, operational decisions will be made at the IWGs. This is because industry are the experts in how their systems operate, so are best placed to make these decisions. We also have not explicitly stated the systems, processes etc. that should be used by industry to deliver the CCR Project. Rather, as long as they deliver the overarching objective and required actions of the CCR Project, the IWGs can determine the processes used to deliver this.

- 5.10 Any recommendations, guidance or queries from the Steering group will be brought to the UR by the chair of the Steering Group.
- 5.11 Progress of the CCR project by the IWGs against the project plan will be monitored by the Project Manager and ultimately the URPB. If the URPB have any concerns on this, for example, if risks are not being mitigated or adequate progress is not being made, then the URPB will review. The URPB may come back with options or a direction for the IWGs to address the concerns (which the UR CP team will pass on to the IWGs). If concerns remain then the URPB may escalate the issue(s) to the UR Board who may then mandate certain aspects of the CCR Project.

6. Overarching Design Principles

Introduction

- 6.1 In developing and implementing the CCR project, there are a number of overarching design principles that we require industry to consider and apply throughout the development, implementation and management stages of the project to ensure that the CCR meets the needs of users now and in the future.

Inclusive by design

- 6.2 Inclusive design involves designing out barriers that create exclusion, inequality and unfairness in markets. This approach should result in all consumers being able to access the services that they need when they require them. Inclusive design will ensure that the CCR is designed and implemented to meet the needs of the end users and will therefore provide the most benefit to consumers and to industry.
- 6.3 In the development, and subsequent stages of the CCR project, it is essential that inclusive design principles are applied throughout. The reasons for this and how we expect this to be achieved are set out below.
- 6.4 Whilst there will be a number of technical, operational and legal considerations and decisions to be worked through to develop and deliver the changes to the CCR project, it is important that it is not a solely technical project. Throughout the entire process, focus should be maintained on the human issues that the CCR project is trying to address and ensuring that at each stage the decisions and chosen outputs are suitable and will meet the needs of those who will be using the CCR.
- 6.5 Inclusive design must be embedded in the CCR project from the start of the design process and throughout all stages of development, implementation and operation to provide the best outcomes.
- 6.6 The perspectives of the CCR users should be included through consultation and research by involving both 'expert consultants' (those with expertise in the area) and 'experts by lived experience' (those who have firsthand experience). This is particularly important for developing the needs-based categories and the universal CCR sign-up form.
- 6.7 Working with experts with lived experience will enable input from consumers with a number of different challenges due to their specific vulnerability. This avoids industry having to assume the preference and needs of end users to help maximise the success of the CCR project. It also will reduce the risk of investing time and resources into creating a

CCR that does not meet the needs of the people it is designed for.

- 6.8 By following the inclusive design principle the CCR design should work for everybody, recognising the diversity of customer experiences and circumstances.
- 6.9 We encourage IWGs to refer to guidance published by the Money Advice Trust and Fair By Design on how to embed inclusive design to improve outcomes for consumers¹⁵.

Secure by design

- 6.10 Secure by design means that the principles of data protection are considered and integrated into all data processing activities from the design stage and throughout the whole project, an approach that should be adopted for the CCR project. Any potential issues should be identified and appropriate safeguards put in place to eliminate or reduce the risks to acceptable levels.
- 6.11 The CCRs will hold a large amount of personal and special category data. This data will also be transferred to and from the CCR holder and relevant licensees. It is therefore critically important that the CCR is designed and implemented to incorporate effective security practices in data recording, sharing and storage processes.
- 6.12 'Data protection by design and default' is a requirement of UK GDPR¹⁶. UK GDPR requires organisations to put in place appropriate technical and organisational measures to implement the data protection principles effectively and safeguard individual rights. This means integrating or 'baking in' data protection into processing activities from the design stage right through the lifecycle. The 'secure by design' principle aligns with this requirement.
- 6.13 Companies will be responsible for complying with relevant data protection legislation, including the Data Protection Act 2018 and UK GDPR¹⁷. The Information Commissioner's Office (ICO) is responsible for the enforcement of data protection laws and regulations.
- 6.14 The following paragraph provides some examples of data protection measures that we consider to be relevant to this project to minimise risks.

¹⁵ [A once in 25 years opportunity: ten principles for designing vulnerable consumer data-sharing programmes - Money Advice Trust](#)
[What support can firms give disabled consumers and people in vulnerable situations guide - Money Advice Trust](#)
[Inclusive Design - Fair By Design](#)

¹⁶ [Data protection by design and default | ICO](#)

¹⁷ [Data protection: The UK's data protection legislation - GOV.UK](#)

This is not a full list of all data protection minimisation measures, but rather is intended to serve as a high level guide for companies on some of the issues that they will need to consider.

- 6.15 Companies will be responsible for ensuring their own compliance with all relevant data protection legislation and regulations and will have measures in place to ensure compliance. Some examples of measures that should be considered to minimise data protection risks include:
- a) The CCR data system should hold the minimum amount of data required to provide for the customer's specific needs.
 - b) Access controls to the data systems should be in place. Appropriate safeguards should be established to prevent unauthorised access to the CCR data. Access to the CCR data should be restricted to only those who require it within a company to use it for its intended purpose. This should be specific teams who have appropriate data protection training, vetting and safeguards in place.
 - c) Companies should ensure that processes are in place to ensure the accuracy of data records. Measure 4.3 of the new CoP requires that CCR holders should contact all registered CCR consumers (or a nominated representative) at least every two years to ensure they are receiving the necessary support. We encourage licensees to develop a review methodology that enables flagging of customers who may require more frequent reviews, for example those with a transient vulnerability.
 - d) Companies should have appropriate organisational and technical measures in place to protect against security risks such as data loss, data breach and cyber-attacks.
 - e) Transfer systems should have appropriate checks in place to ensure data is accurately transferred. This should include appropriate back-ups to safeguard consumer information.
 - f) Any staff members that collect or have access to customers personal data should have appropriate data protection training, which would include what to do if they suspect there has been a data breach.
 - g) It should be clear for customers who they should contact if their circumstances change and they want to update their details on the CCR, or they want to see what data is held on them on the CCR.
- 6.16 Thorough testing should be carried out before the CCR is implemented to ensure data sharing is secure and that there are no potential technical

issues which could result in data loss or breach.

- 6.17 We strongly encourage the IWGs to engage with the ICO throughout this process and to consult ICO guidance. Licensees should complete their own Data Protection Impact Assessments (DPIAs) to identify and assess the risks in the CCR project and to identify measures that can be implemented to minimise these risks. Specific guidance on completing a DPIA can be accessed through the following link [Data protection impact assessments | ICO](#).
- 6.18 In our engagement with the ICO, we have invited them to attend the IWGs to advise on data protection issues. We can also take any relevant questions raised at the IWGs to the ICO for consideration.

Adaptable by design

- 6.19 The adaptable by design principle means meeting the current needs of vulnerable consumers whilst also considering and safeguarding against potential future harms by ensuring the CCR can be adapted to accommodate either industry changes or any identified improvements.
- 6.20 It is important that the CCR is designed and implemented to be adaptable to changes or developments in industry, for example the roll out of smart meters in Northern Ireland or any new protections or services that those on the CCR may be eligible to receive based on their needs.
- 6.21 The systems and processes to deliver the CCR must be compatible for all industry to use and facilitate any new entrants joining the system (this may entail developing market processes). It is important that the CCRs that are designed in Phase 1 are compatible to facilitate moving into Phase 2.
- 6.22 It is also important that the CCR that is designed and implemented accounts for any customer changing supplier or a company leaving the market, so that a customer's new supplier is flagged that they are on the CCR to provide the additional services that the customer may require.
- 6.23 Following the adaptable principle, during the development stage of Phase 2 we expect industry to review the energy CCR and also to review the utility CCR during the management stage. Engagement with those on the CCR and consumer groups should be included as part of this review to check that the CCR is fit for purpose and working for the end users it was designed for. The industry review should also determine if updates are required to the CCR to facilitate any new protections or services (that have come in since the CCR was implemented), that consumers on the CCR may be eligible to receive.

7. Required actions to facilitate delivery of the CCR project

Introduction

7.1 We have identified a number of required actions that will facilitate the development, delivery and management of the CCR project. These actions will be completed or facilitated by IWGs. The required actions are:

- Formation of Industry Working Groups
- Development of a project plan
- Development of industry procedures
- Standardisation of needs-based categories
- Standardisation of the CCR sign-up form
- Development of a communications plan

7.2 We will provide more detail on each action in this chapter.

Industry Working Groups

7.3 The development, implementation and management of the CCR project will be delivered by industry through IWGs.

7.4 We recognise that developing and delivering the CCR project will require a number of decisions and associated discussions. We consider industry is best placed to lead these discussions and decisions as industry are the experts in how their systems operate (to include their own CCR (if applicable)).

7.5 We expect that a joint electricity and gas (energy) IWG is formed alongside a separate IWG for NI Water. The two IWGs will be required to work collaboratively to deliver the CCR project.

Formation of the industry working groups

7.6 Following publication of this paper, industry is to establish the energy and water IWGs.

7.7 To ensure industry representation, we expect each company (NIE Networks, Gas DNOs, electricity and gas suppliers and NI Water) to have at least one representative at each IWG meeting.

- 7.8 Following discussions with NIE Networks on the CCR Project, NIE Networks have been supportive of the project and have agreed to hold the CCR register (this will initially be the energy CCR in Phase 1 and then the single utility CCR in Phase 2). As the energy CCR holder, NIE Networks will also lead the energy IWG in Phase 1. NI Water as the water CCR holder will lead the water IWG in Phase 1.
- 7.9 To facilitate the amalgamation of the water CCR into the energy CCR in Phase 2 it is crucial that the two IWGs collaborate regularly to share updates on their progress and in making decisions on the key actions required for project delivery (such as on the needs-based categories). We recommend that the two IWGs meet at least once a quarter but frequency may increase as the project progresses. This will be incorporated into the project plan.
- 7.10 In forming the IWGs, industry may want to develop a ToR (if they consider it would be of benefit). This is optional for the IWGs and would be the responsibility of each IWG to agree and coordinate.

UR's Role

- 7.11 The CCR project is of utmost importance to UR and we will support and enable industry to deliver this project. It will bring together and support all the positive work and changes that have been implemented through the BPF programme to deliver more benefits to NI consumers.
- 7.12 We have set out our overarching objective for the CCR project alongside the core deliverables and actions that we consider are required to achieve this vision, as well as the principles to be followed to support the delivery of the CCR project.
- 7.13 We will provide oversight to the CCR Project through the URPB and UR Board. We will review progress on the CCR project to determine if any aspects of the project require mandating (as set out in Chapter 5). At an operational level the UR CP team will attend the IWGs as an observer and can offer guidance and bring issues to UR for consideration and decision. We expect industry (as the experts in their processes and systems for CCRs) to drive and lead the IWGs.
- 7.14 We will procure and manage a PM for the CCR project. The role of the PM will be to develop and agree a project plan (with assistance from the IWGs), manage delivery of the plan, monitor progress against the plan, attend and arrange IWG meetings (once they are in place), bring any issues or updates back to UR from the IWGs and to work with industry to appraise the costs and benefits of the CCR project.

- 7.15 The PM (once procured) will be provided with the appropriate contact for each company to facilitate their work on the CCR project. This should include contacts for those who will represent each company at the IWGs. We will update industry when we have procured the PM.
- 7.16 We will facilitate engagement between the IWGs and relevant experts and stakeholders, for example the ICO and organisations involved in data recording and sharing projects in GB.
- 7.17 If there is a difference of opinion or specific issues arise in the IWGs, we require the industry participants to work together to come to a solution and resolve these within the group. However, if situations arise where the industry participants cannot reach agreement on certain issues, then the IWGs can bring issues to UR for consideration (following the process set out in Chapter 5). It is important to note that UR will only consider issues that have been brought collectively as a group, rather than by distribution or supply companies on an individual basis¹⁸. To expedite delivery of the CCR project, we consider that where an issue is referred to UR, the URPB, UR Board or UR CP Team will make a decision which will be final and the industry must abide by that decision.

External input

- 7.18 The IWGS will include representation from across industry including the Consumer Council. In addition we also encourage the IWGs to seek independent views from relevant bodies that will help in the development of the CCR project. We strongly encourage the IWGs to engage with the ICO to ensure they are compliant with UK GDPR. In our engagement with the ICO, we have invited the ICO to attend the IWGs to advise on data protection issues. We can also take any relevant questions raised at the IWGs to the ICO for consideration.
- 7.19 We will bring CCR project updates to the Consumer Protection Advisory Group (CPAG)¹⁹ to keep consumer bodies informed on the progress of the CCR. We can also bring any aspects the IWGs may want raised with the consumer bodies to the CPAG.
- 7.20 As set out in Chapter 6, we require IWGs to adopt inclusive design principles at all stages of the project. Therefore, end users must be involved from the very outset.

¹⁸ This does not apply to NI Water. As NI Water is the only water company and they are effectively operating their own water IWG, there should be no cause for disagreement within their IWG. However, if there is disagreement on cross industry issues (or between the two IWGs), then NI Water can bring the issue(s) to UR for consideration.

¹⁹ This is a group of consumer and interest bodies who liaise regularly and work constructively with UR and industry to provide advice and guidance on consumer needs, challenge, share information and experience and make recommendation to UR and industry.

- 7.21 If the IWGs require any retail market design changes to deliver the CCR project, they will have to be progressed through the relevant industry forums to follow the usual processes for changes.

Project Plan

- 7.22 A detailed project plan will be required outlining the key stages of the development, implementation and management of the CCR project for Phase 1. The project plan will set out the key deliverables and milestones for the project, the separate workstreams (such as, but not limited to, system design, industry engagement, data protection/legal compliance and communications), map out required actions and tasks and specify agreed roles and responsibilities for tasks and actions across stakeholders.
- 7.23 A Project Manager (PM) will be procured by UR to develop the project plan, monitor progress against this plan and provide updates to UR. The PM will also be responsible for maintaining project logs and registers including for example risk, issues, change, communications and decision logs.
- 7.24 We require industry to assist the PM in developing the project plan for Phase 1 and when the PM is in place, they will begin engagement with industry to develop the project plan through the relevant IWGs. The project plan for Phase 1 will cover the required actions and outputs for both the energy IWG and the water IWG. UR will review the plan before it is finalised with the IWGs. Once the project plan is in place, the PM will manage delivery of this plan.
- 7.25 We acknowledge that developing and implementing changes for the CCR project will be complex. We also acknowledge that some of the decisions around the CCR project cannot be finalised immediately and will require to be developed through discussions at the IWGs. Therefore, the project plan will be a live document, to allow updating following certain decisions. UR will receive a copy of the project plan following each update, with the update clearly highlighted for review.
- 7.26 The CCR must be developed and implemented in a robust and a customer centric way following inclusive design principles. The project plan should balance providing adequate time for thorough development and testing whilst ensuring that the benefits of the CCR can be realised as soon as is practical.
- 7.27 Following agreement of the project plan, the PM will provide UR with a progress report against the project plan each month (in line with URs project management framework). The progress report will be high level to include any key decisions or actions, any risks identified, issues that have

arisen and progress against the timeline. Industry may be asked by the PM to feed into this progress report. The progress report will be shared with the URPB and updates will also be provided to the UR Board.

- 7.28 If we consider the IWGs are not making appropriate progress against their project plan, we may issue guidance, a direction or mandate certain aspects (as set out in Chapter 5).

Industry Procedures

- 7.29 To support the implementation and management of the CCRs we expect industry to develop industry procedures for the CCR project.
- 7.30 The industry procedures will set out the roles and responsibilities of each company. They will ensure all companies follow the correct procedures and practices to ensure the smooth operation of the CCRs facilitated by all of industry.
- 7.31 These should be developed and finalised during the development stage so that they are in place by implementation.
- 7.32 The industry procedures must be shared with the URPB and UR Board for review before they are finalised. Approval of the procedures will be through the UR Board.
- 7.33 Once the industry procedures are developed and finalised, compliance with the industry procedures will be added to the relevant licences following the applicable licence modification notice and decision processes. This will ensure all industry participants, and any new entrants will be mandated to follow and meet the required industry procedures for the CCR project.

Standardised needs-based categories

- 7.34 IWGs must develop a standardised set of categories for the needs-based tier with flags to identify which sector these categories apply to.
- 7.35 The primary focus of the needs-based tier is recording the customer's individual support needs or specific requirements, rather than a specific vulnerability, disability or illness.
- 7.36 The focus of this register will be 'what is the consumer vulnerable to' and 'what is the support that they require.' Whilst recording the specific vulnerability, disability or illness might let the company know that the consumer is vulnerable, this information does not necessarily make the company aware of what the actual support(s), protection(s) or reasonable adjustment(s) to service, that the consumer needs. If the register does not

record the specific form of support a consumer requires (or only provides high level indications that a support need exists), then each company will potentially have to contact that consumer to understand what support they actually need. This would not be neither the best experience for the consumer, or the most efficient process for industry.

- 7.37 This does not mean that a specific vulnerability or category of vulnerability should not be recorded, but the overall focus should be matching the individual's additional requirements against actionable supports that are provided. This could be for example, through recording the additional services an individual needs or recording the specific challenges of an individual for example 'I do not like speaking on the phone', 'I need more time to respond or complete tasks', 'speak slowly and clearly when interacting with me', 'I take a long time to answer the door', 'I cannot read', 'I need large print' etc.
- 7.38 We expect many of the needs-based categories and associated services offered will be low cost or no cost, with the majority of companies likely to already be providing these services for their customers. The needs-based tier will then provide a centralised note of the additional needs of the customer.
- 7.39 In developing the needs-based categories, it should be clear for each category what a consumer could expect to receive from stating such needs (for example if someone has no sense of smell this could be relevant to gas companies, but not water or electricity). Industry may also want to clarify which needs codes will result in a service that will be provided in all of the customers dealings with a company (for example communication needs) and those that will only become applicable in emergencies (e.g. what a customer could expect if there was an outage).
- 7.40 In the spirit of requiring the IWGs to adopt inclusive design principles in developing the CCR, we will not be prescriptive on the categories to be used for the needs-based tier but reiterate that these will need to be consistent across utilities. Under the inclusive design principle, the needs-based tier that is developed should adopt a customer centric design and engage with users to determine which form of needs-based registration (to include needs-based categories) is best for them and most accessible to meet their needs. To ensure the needs-based recording is linked to the individual it is applicable to, and maintains their record even when they move dwelling, the identifier for the needs-based CCR should be linked to the individual rather than to the household.

- 7.41 We require the IWGs to provide a template to the UR and consumer groups²⁰ on their chosen needs-based categories for comment before they are finalised.
- 7.42 Whilst water will not be implementing a needs-based tier in Phase 1, we still require NI Water to be involved in the development of the needs-based codes for the Phase 1 energy needs-based tier. The energy and water IWGs should work together in creating the needs-based categories.
- 7.43 We encourage industry to explore examples of needs-based categories that have been used in other data sharing projects²¹. UR can reach out to individuals or groups who have been involved in similar projects, to invite these groups to share their learnings with the IWGs.

Standardised CCR sign-up form used by all licensees

- 7.44 To support sign-up to the CCR, IWGs must develop a single standardised CCR sign-up form. This form will be used for registration to the energy CCR in Phase 1 and then for registration to the utility CCR in Phase 2.
- 7.45 Whilst the standardised sign-up form will not be applicable to NI Water's CCR in Phase 1, we expect NI Water to feed into the development of the form, as they will be using the form when the single utility CCR is implemented. The form should be user-friendly and designed to encourage and support consumers who are eligible to be on the CCR to sign-up.
- 7.46 The requirement of developing and implementing a standardised CCR sign-up form will make the sign-up process for consumers more accessible and simpler. It follows the 'tell us once' concept of a consumer only having to disclose their additional needs once (through this sign-up form), for all of their utility companies to be aware of the additional needs. Vulnerable consumers may not have the time, energy or level of trust to repeatedly disclose their support needs across all their utilities. This approach will remove the burden of multiple disclosures for the consumer and mitigate barriers to sign up.
- 7.47 To support the recording of individual support needs, the IWGs should ensure the sign-up form is clear on what support can be provided (and

²⁰ This can be through the CPAG (Consumer Protection Advisory Group), which we can help facilitate if the IWG request.

²¹ Money Advice Trust and What We Need (2025) [What support can firms give disabled consumers and people in vulnerable situations guide](#)
 What We Need [Support Needs Lists – What We Need](#)
 Experian Support Hub [Support Hub - All Support Need](#)
 Wessex Water [Wessex-Water-response-to-Priority-services-registers-a-consultation-on-standards-for-water-companies-in-England-and-Wales.pdf](#)
[Vulnerability Registration Service](#)

include from which industry or all), how this support would work in practice, what difference the support could make and when the consumer would receive this support (for example on all communications, or when a company representative calls to the house, or if there is interruption to supply etc.). This will help set expectations for consumers on what they will receive from signing up to the CCR and can assist the consumer in disclosing their specific needs. Whilst consumers who have an illness, vulnerability or disability are often best placed to know what support they need (either in an emergency or for everyday), it is not the same as an individual knowing what support a specific organisation could provide to them or understanding the benefits or difference that such support could make to their lives.

- 7.48 We will not be prescriptive on the format that the CCR sign-up form takes. Under the inclusive design principles (Chapter 6), the CCR sign-up form that is developed should be customer centric and must be accessible. The IWGs should engage with users at the start and throughout the development of the CCR sign-up form to ensure that it meets user needs. To support this the IWGs should share the CCR sign-up form with consumer groups²² for comment before finalisation. The IWGs should also consider applying 'Plain English' or 'Plain Numbers'²³ approaches to the development of the CCR sign-up form.
- 7.49 Following the secure by design principle (Chapter 6), which aligns with the UK GDPR data minimisation principle, we expect that the minimal data necessary for processing purposes is gathered at the sign up stage. For the needs-based tier, the nature of the consumers vulnerability may not need to be stored in all cases.
- 7.50 We require the IWGs to share the CCR sign-up form with the UR for review and approval before it is finalised.

Communications Plan

- 7.51 A co-ordinated communications plan will be essential to support the delivery of the new CCR and realise the full benefits to consumers and industry. If consumers do not know about the CCRs, what the CCR can (and cannot) offer them and /or how to sign up to the CCR, then those customers with additional needs will not be able to benefit from the development and implementation of the new CCR.

²² This can be through the CPAG (Consumer Protection Advisory Group), which we can help facilitate if the IWG request.

²³ This could be through direct working with [Plain Numbers](#) or another body who provides a similar service, or by considering and applying the principles through internal resources.

- 7.52 A central communications workstream and plan will facilitate all key stakeholders to work together to deliver consistent communications and sharing of resources to deliver the best outcomes for consumers and industry.
- 7.53 A specialist subgroup will be established for the communications workstream as part of the CCR project. This will be factored into the project plan to include when the subgroup will be established and high level activities/outputs for the communications plan (the project plan can be updated with more detail on this at a later stage once the communications workstream subgroup is established).
- 7.54 The communications workstream subgroup will fall under, and report to, the IWGs. IWGs will decide who will lead the communications subgroup. The leader of the subgroup will be responsible for overseeing the development of the communications plan and agreeing the key outputs (for incorporation into the project plan). IWGs will decide on the structure of the communications subgroup and membership.
- 7.55 The detail of the communications to be delivered as part of the CCR project, will be developed by the leader of the communication workstream subgroup for approval by the IWGs.

Resourcing for price regulated companies

- 7.56 Some price regulated companies stated that establishing the IWGs to deliver the CCR project will require additional resources. They noted that to deliver the new requirements they will therefore require additional allowance.
- 7.57 We recognise that developing and implementing the CCR project may result in the requirement of additional resources. The DNOs across water, electricity and gas (namely Northern Ireland Water, NIE Networks, Phoenix, Evolve and Kinecx Energy) are subject to price controls which we set. Development and delivery of the CCR project was not finalised during the time of the price control decisions, so may not have been accounted for through appropriate funding allocation to enable delivery. We have set out assurances for each DNO below on how they can deliver CCR project set out in this paper under each of their associated price controls.

Gas DNOs

- 7.58 The GD23²⁴ Gas Distribution price control (for the period 2023-2028) includes provision for the Best Practice Framework. GD23 states that UR will continue our work and positive engagement with the GDNs on the

²⁴ [Gas Distribution Price Control \(GD23\) Final Determination | Utility Regulator \(ureg.gov.uk\)](https://www.ureg.gov.uk/gd23)

development and implementation of the BPF and the delivery of other future consumer engagement and protection projects. GD23 provides provision of cost recovery for work undertaken by GDNs to deliver future consumer protection measures, which could result in changes to processes and systems and therefore generate a cost. The recovery of costs as a result of such work and projects, includes, but is not limited to the BPF. If the costs accepted in advance as appropriate by UR are in line with the delivery of future consumer protection development, then they will be permitted, subject to normal regulatory scrutiny and approval. The mechanism for this recovery is through the ‘uncertainty mechanism’ for which there will be no de-minimis level (as is currently the case for this mechanism).

Northern Ireland Water

- 7.59 Northern Ireland Water’s current price control PC21²⁵ (for the period April 2021- March 2027) includes for delivery of the company’s obligations under the CPP Best Practice Framework. This is one of the key development outputs that has to be delivered by Northern Ireland Water during the price control period. Improvement in vulnerable consumer identification, assistance, staff training, CCR delivery (including volume, reach, awareness and promotion), and monitoring and reporting were set out as a specific customer service deliverables for Northern Ireland Water during PC21. As a consequence of this, and the fact that similar obligations on data sharing are discharged by the comparator companies used to benchmark Northern Ireland Water’s Opex allowance, we therefore consider that the PC21 final determination made adequate provision for the delivery of the BPF decisions set out in this paper.

Electricity DNO (NIE Networks)

- 7.60 The final determination for RP7 regulatory price control was published on 30 October 2024²⁶. It set out our final funding decisions on a range of areas. This includes how much the company can charge consumers to run its’ business, how the company is going to operate, maintain and invest in its’ assets, and the level of return on capital invested. We will continue to engage with NIE Networks to discuss the implementation of the CCR project.

Price regulated electricity and gas suppliers

- 7.61 The implementation of a new CCR structure, is a dedicated project within UR’s Consumer Protection Programme for 2024 to 2029²⁷. The price

²⁵ [PC21 Final Determination | Utility Regulator \(uregni.gov.uk\)](https://www.uregni.gov.uk/PC21-Final-Determination)

²⁶ [RP7 Final Determination | Utility regulator \(uregni.gov.uk\)](https://www.uregni.gov.uk/RP7-Final-Determination)

²⁷ [CPP 2024-2029 Decision Paper.pdf](#)

regulated electricity and gas suppliers²⁸ are permitted to recover any reasonable costs incurred (or to be incurred) by the Licensee to comply with any new or modified Conditions of the licence which are made in consequence of the UR's Consumer Protection Programme.

Summary of requirements from industry for the CCR Project

- 7.62 Table 2 reiterates all the specific CCR project requirements for industry that have been set out in this paper.

²⁸ Power NI, Firmus Energy (Supply) and SSE Airtricity Gas Supply (NI).

Table 2: Summary of industry requirements for the CCR project

Required industry actions
Organisational
Establish Industry Working Groups - an energy (electricity and gas) IWG and a water IWG.
Core actions
Assist the Project Manager in developing the project plan for Phase 1.
Develop industry procedures. These should set out the roles and responsibilities of each company and the processes and procedures each company will have to sign up to. The industry procedures will be introduced into licences by UR following the applicable licence modification processes.
Develop a standardised set of needs-based categories (across electricity, gas and water). Provide a template to the UR CP Team and consumer groups ²⁹ on the chosen needs-based categories for comment.
Develop a standardised CCR sign-up form (to be used for registration to the energy CCR in Phase 1 and then for registration to the utility CCR in Phase 2). Provide a template of the sign-up form to the UR CP Team and consumer groups for comment.
Develop a communications plan (through the establishment of a communications specialist subgroup workstream who will develop and implement the plan).
Supporting actions
Apply the overarching principles of inclusive by design, secure by design and adaptable by design at all stages of the CCR project.
Explore what the medical tier could offer to those reliant on either gas or water for their health needs and to determine if it would be of value to expand the medical care tier (to gas and or water). IWGs are required to bring their recommendations and reasons on this to UR for decision.
Testing before implementation of the energy CCR (IT, GDPR and consumer testing).
Complete any actions assigned through the project plan and/or PM in the timeframe provided.

Note 1: The project plan, industry procedures, standardised needs-based categories and standardised sign-up form must be shared with the UR for review and approval before they are finalised.

²⁹ This can be through the CPAG (Consumer Protection Advisory Group), which we can help facilitate if the IWGs request.

8. Next Steps

- 8.1 We recognise that this is a complex and long-term project. We expect industry to form the IWGs following publication of this paper and to invite UR and CCNI to attend these groups.
- 8.2 Industry should provide UR with a list of IWG members by the end of December 2025. The first IWG meetings should occur no later than the end of February 2026. Their first action will be to engage with the PM to help develop the project plan.
- 8.3 We are in the process of procuring a PM for the CCR project. We will let industry know once the PM is in place and when they will engage with the IWGs.
- 8.4 Following publication of this paper UR will begin work on establishing the URPB and Steering Group which we expect will be in place during Q4 of 2025/26. We will inform industry of the formation and detail of the URPB and Steering Group through the IWGs.

Glossary

BPF	Best Practice Framework
CCNI	Consumer Council for Northern Ireland
CCR	Customer Care Register
CoP	Code of Practice
CP	Consumer Protection
CPAG	Consumer Protection Advisory Group
CPP	Consumer Protection Programme
DNO	Distribution Network Operator ³⁰
DPIA	Data Protection Impact Assessment
ICO	Information Commissioner's Office
IWG	Industry Working Group
MCR	NIE Network's Medical Care Register
NIW	Northern Ireland Water
NIE Networks	Northern Ireland Electricity Networks
PM	Project Manager
ToR	Terms of Reference
UK GDPR	UK General Data Protection Regulation
UR	Utility Regulator
URPB	UR Project Board

³⁰ Where reference is made to DNOs within this paper, this may refer to one or more of the following – NIE Networks (the electricity DNO), Phoenix Energy, Kinecx Energy and Evolve (the gas distribution networks) and Northern Ireland Water (dual role of network and supply).