



Jewel Joshy  
Utility Regulator  
Millennium House  
16-22 Great Victoria Street  
Belfast  
BT2 7BN

21 July 2025

Dear Jewel,

**Re: Consultation On Market Change Request 5005.**

I am writing regarding the Utility Regulator (UR) consultation on Market Change Request 5005 (MCR 5005) that proposes the creation of a new market procedure (MP NI 40).

**The Consumer Council**

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

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

**The impact of Change Request on Northern Ireland consumers**

MCR 5005 proposes the creation of a new market procedure (MP NI 40) that would facilitate the transfer of customers from their 'Exiting Supplier' to a 'New Supplier' via a 'Customer Bulk Transfer'. The proposed market change could potentially impact a variety of stakeholders such as electricity suppliers, NIE Networks and particularly electricity consumers who are being transferred over to a New Supplier from an Exiting Supplier as part of the market exit process.

**Consumer views on the following UR consultation questions**

We have provided our feedback to the questions below, which we hope is useful:

- **Do you agree with the proposal outlined in MCR 5005 and the proposed creation of a new market procedure (MP NI 40)? Please provide rationale.**

The Consumer Council agrees with the proposal outlined in MCR 5005 and the proposed creation of a new market procedure (MP NI 40) as it is imperative that there is a long-term, practical market procedure mechanism that details the step-by-step process required to

complete the Bulk Transfer of Customers from the Exiting Supplier to a New Supplier.

This will provide reassurance and confidence to our electricity suppliers, NIE Networks and consumers that a tried and tested process is in place. It will also help safeguard against any disruption to customer electricity services in the event that a Supplier chooses to exit a specific market sector(s).

- **Are there any steps within MP NI 40 that require amendment or clarification? Please provide rationale for any changes.**

The Consumer Council does not believe that any steps within MP NI 40 require any further amendment or clarification (at this stage) as it seems transparent and fit for purpose for all parties concerned. However, an analysis of how the MP NI 40 process performed after the first run will provide the necessary information if there are any gaps, missing steps or further clarification required within the process.

- **Are there any additional consumer protection provisions that should be added to MP NI 40, or considered alongside the procedure, to prevent consumer detriment and/or harm element in the event this procedure is implemented? Please provide rationale.**

The Consumer Council is content that there are adequate consumer protections within MP NI 40. However, we have a few suggestions that should be considered alongside the procedure to help prevent customer detriment and/or harm:

- A set time limit from when a supplier announces they are exiting the market until the Bulk Transfer process begins i.e. 12 months.
  - Offer customers an opt in / opt out option for the bulk transfer.
  - The Exiting Supplier must ensure ongoing compliance with existing licence conditions and/or Codes of Practice to ensure that consumers are adequately protected during the bulk transfer process.
  - UR governance over the process with autonomy to stop or suspend the process at any time but providing transparency for reasons for doing so.
  - The UR must have total access and oversight on Exiting and New Supplier customer communications, terms and conditions.
- **Are there any other factors in relation to this proposal that you think should be considered? Please provide rationale.**

The Consumer Council believes there are a few other factors that should be considered:

- System change and testing may be required on NIE Networks system to facilitate the new process, so, a series of data checks between the exiting supplier and NIE Networks prior to the bulk transfer date should be completed to ensure a smoother transfer of data.
  - Suppliers may need to consider implementing appropriate systems and processes to act as Exiting Supplier or as New Supplier in accordance with the requirements of MP NI 40. This is very likely to result in considerable costs to electricity suppliers, NIE Networks and Secure Meters.
- **Do you have any other comments in relation to the proposal?**

The Consumer Council has a few comments in relation to the proposal:

- Once the Exiting Supplier has exited the market sector, they should not be allowed to re-enter the market at any stage in the future.
- It must be clearly communicated that both credit and prepayment consumers involved in the bulk transfer process have an adequate cooling-off period (14 days) should they wish to move away from the New Supplier.
- Adequate checks and balances need to be put in place to ensure that all customers have transferred successfully and that no customers have been left with the Exiting Supplier.
- Retained credit and debt arrangements should form part of the commercial agreement between the Exiting and New Supplier.
- Associated costs implementing systems and processes including pre-payment keypad card costs (including courier costs) must be absorbed by either / both the Exiting or the New Supplier. These costs should not be passed onto the customer through higher tariffs or increased standing charges.
- Any commercial agreement must not infringe upon the electricity supply licence conditions.

The Consumer Council looks forward to working closely with the Utility Regulator, NIE Networks and electricity suppliers to ensure that the new market procedure for the bulk transfer of customers works in the best interest of Northern Ireland consumers.

We look forward to continued collaboration with you and your colleagues.

Yours sincerely,



**Raymond Gormley**  
**Head of Energy**