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Market Change Request 5005

Click Energy Response to Consultation paper on Proposed Measures

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Introduction

The Utility Regulator has published a Consultation Paper (Market Change Request 5005) for feedback on a new retail market procedure that would allow an electricity supplier to voluntarily exit certain market sectors (i.e. domestic or non-domestic sectors) rather than exiting the entire market.

Additionally, MCR 5005 proposes the creation of a new market procedure (MP NI 40) that would facilitate the transfer of customers from the 'Exiting Supplier' to a 'New Supplier' via a 'Customer Bulk Transfer'.

Click Energy has compiled the following response.

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

Yes, Click Energy is in favour of the proposal outlined in MCR 5005 and supports the creation of the new market procedure, i.e. MP NI 40.

The proposed MP NI 40 represents a practical solution to a gap that exists within the current market framework, whereby a supplier may wish to exit the market in a certain sector without having to utilise a full exit via the "Supplier of Last Resort" process.

MP NI 40 provides a mechanism for managing such transitions through a "Customer Bulk Transfer" process, ensuring continuity of service / supply and minimising disruption for consumers.

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

At this time, we do not believe that any steps laid out within MP NI 40 require further amendment or clarification. The three stage approach provides transparency for all parties involved, and we believe it is fit for purpose without requiring further amendments at this stage.

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

We believe that the consumer protection provisions outlined within MP NI 40 are appropriate and adequate. There are several safeguards in place such as UR oversight with the authority to

suspend or stop the process if necessary, the option for customers to opt out of the bulk transfer, and assurance activities via MEPCT to ensure readiness.

Are there any other factors in relation to this proposal that you think should be considered? Please provide rationale.

Click Energy believes the proposal is comprehensive, however would like to mention a few additional factors that may be worthy of consideration.

- Post implementation review: -it may be beneficial to include a formal review following the first use of MP_NI_40. This would allow stakeholders to assess the procedure in practice and identify any unforeseen challenges and provide additional learning for any future uses of the process.
- Data Quality: _given the reliance on accurate customer data for a smooth transfer, complete a series of data checks between the exiting supplier and NIE Networks prior to the bulk transfer date.

Do you have any other comments in relation to the proposal?

As communicated within our impact assessment, Click Energy proposed an alternative approach that involved splitting the customer database between credit and prepayment customers.

By utilising the current “Change of Supplier” (CoS) process, we believe this would reduce the implementation effort, as suppliers already have the necessary systems and procedures in place for customer acquisition. Therefore, no new market procedure would be required for credit customers.

However, a new process would still be necessary for prepayment customers. This would need to mirror the existing “Supplier of Last Resort” (SoLR) framework and involve coordination between the decertifying supplier, the new supplier, NIE Networks, and Secure Meters.

One final point, we believe implementing such a change within the market would have considerable costs to electricity suppliers, NIE Networks and Secure Meters, which could potentially (or ultimately) have to be recouped through higher unit rates meaning increased costs for all consumers.