

## Marie Curie Comments on the Utility Regulator Forward Work Plan (FWP)

05.02.2026

### Whether we have prioritised the right projects

1. It is vital that support for consumers in mitigating affordability concerns remains a critical priority for the utility regulator and we are pleased to see this outlined in the FWP, including the focus on protecting vulnerable customers.
2. Key deliverables set out for year 3 of the Consumer Protection Programme 2024-29 are all welcome. The ongoing commitment to carrying out the consumer insights tracker is important, which offers a regular update on consumer behaviour and attitudes. It is important that the information in it informs UR work and that it is also shared and used to inform industry and Government actions- this includes informing and potentially helping to monitor the impact of actions set out in the new fuel poverty strategy- Warm Healthy Homes. Qualitative work that helps to more fully understand behaviours / vulnerabilities is also very important. Whilst these trackers are helpful they do not always make people at end of life visible and Marie Curie has been pleased to be able to provide specific data on prevalence and risk of fuel poverty for those in the last year of life. We also welcome the UR staff engagement on the data and how it can inform UR work. (source [link](#))
3. We are very pleased that the needs of people with a terminal illness are being specifically referenced in the guidance and framework published by the Utility Regulator under its customer protection programme. This includes automatically placing terminally ill people in the highest risk category of the new customer care register system.
4. Marie Curie fully supports the use of UR powers to require all energy companies to adhere to minimum practices that are fair, reasonable, easy to understand and accessible is very important. Guidance and support such as the Consumer Energy Charters and best practice frameworks are also very welcome. Industry adherence to these measures are of benefit to all energy consumers across NI, but are most significant for those at heightened risk of fuel poverty and energy use rationing, or doing without in other ways such as food so they can pay energy costs.
5. We welcome the focus in the FWP on the specific issues faced by consumers living in Private Rented Sector (PRS). We know from our own [research](#) on poverty in the last year of life that people living in PRS or social housing are at a higher risk of poverty compared to those that own their own homes.
6. We also know that the period following a bereavement can be very difficult for loved ones, particularly those who had caring roles for the person who has died. We are pleased to see a focus on bereavement support in this consumer protection programme. Marie Curie has conducted [research](#) in this area which shows that too often bereaved people find it difficult to close service accounts and are distressed by receiving unnecessary bills and correspondence after reporting the death to a company. Marie Curie is calling for

Government departments and regulators to work with relevant industry groups to develop minimum standards for death administration processes- this includes investment in specifically trained staff, have an agreed standard process that is easy to find, understand and follow, and ensure no correspondence is sent to the person that has died.

7. It is vital that UR has effective mechanisms in place to monitor industry compliance with the standards set. It is also important that these monitoring reports are publicly available and transparent- even if in summary form, without identifying individual companies or suppliers. This type of information would be of interest to many- including consumers and charities that advocate for vulnerable groups. Progress in delivery against standards may also improve public trust in utility companies as well as raising awareness of the role of UR and the obligations placed on industry around customer care / standards. A Mid-term Review of the Consumer Protection Programme would be very important.
8. Marie Curie has highlighted a number of issues in previous consultations and we have listed these again below for your convenience. We are also very pleased that the new fuel poverty strategy addresses a number of these. These include:
  - Work to create a single Utility Customer Care Register is very important- we strongly support it being a priority for the regulator. It is an important way for energy companies to identify vulnerable customers.
  - A requirement for companies to alert vulnerable customers to the availability of other cheaper payment methods and tariffs.
  - We strongly support any plans to conduct work on how suppliers can monitor the number of PPM customers that could be self-disconnecting and what additional support can be provided.
  - It is vital that industry invest sufficient resource to implement practices that meet good practice guidance.
  - Work with industry to introduce a reduced rate scheme or voucher scheme for vulnerable customers, particularly those at end of life where other measures such as billing schedules are inappropriate.
9. The new fuel poverty strategy has been published today, and it is vital that the UR activities are fully aligned with relevant commitments set out in it. We also look forward to engaging with the UR on areas of shared interest stemming from it. As you will be aware, Marie Curie has a particular interest in those strategy commitments that relate to vulnerability and end of life specifically. We are very pleased that there are specific actions within the Warm Healthy Homes Strategy that are of direct relevance to people with terminal illness and at end of life. Just a few of the most significant ones are included below:

Action 32: Explore end-of-life energy needs and challenges and provide appropriate support.

Action 18: Work to ensure that all customers on the Medical Care Register are on the most beneficial tariff from their supplier.

Action 33: Identify and act on improvements to data-sharing that could help target assistance at those most in need, including in an energy price crisis.

Action 25: Significantly increase the availability and accessibility of good energy information and advice for low-income, vulnerable households.

10. Marie Curie is very pleased to see an action to ensure everyone on the medical care register is on the lowest tariff. There is also a need to ensure that everyone that should be on the register is on it. We would also argue that by addressing info sharing challenges (action 33), the group of people that suppliers could be asked to ensure are on the cheapest tariff is extended to those receiving social security benefits through the special rules for terminal illness- this is a group of people that are clinically confirmed as being reasonably expected to die within 12 months. We would also like to ensure that as part of this system people are reminded about the rebate scheme for prescribed medical devices- oxygen concentrators and dialysis machines.
11. We also strongly support a one stop shop and access to up to date easily accessible energy info and advice. This should be targeted at low income households but would also be useful to practitioners who have a role in supporting and signposting vulnerable households i.e. councils, VCS groups like Marie Curie, and utility customer care teams.

#### **Any objections to our proposed projects**

12. No.

#### **Any other comments**

13. We understand your work contributes to the NI Assembly Programme for Government- the current PfG refers specifically to finding solutions that support people affected by death, dying and bereavement. Anything you can do to support Government in this commitment is welcome.
14. Very pleased to represent terminally ill people on the UR Consumer Protection Advisory Group. We have also welcomed the opportunity to respond to previous consultations and workshops such as those on supplier customer service levels, code of practice for customers in vulnerable circumstances and energy literacy.
15. Thank you for the opportunity to feed into this consultation response and don't hesitate to get in touch if you would like to discuss any part of the consultation response in more detail.