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Third Party Intermediaries In The Energy Market

**Click Energy Response to Consultation paper
on proposed measures**

06/11/2025

Introduction

The Utility Regulator has published a Consultation Paper ([Third Party Intermediaries In The Energy Market](#)) with the aim of developing an understanding of Third Party Intermediary (TPI) operation in Northern Ireland energy markets in order to ensure both non-domestic consumers and micro/small scale generators engaging with TPIs are adequately protected, and to consider if any regulatory intervention or protections may be required. As an interested stakeholder, Click Energy has compiled this response.

Strategic aim

Question 1: Do you agree with our proposed strategic aim, objectives and scope in relation to this TPI project? If no, please provide reasoning.

Response:

We broadly agree with the strategic aim and objectives in relation to this project, however we do not believe that Wholesale TPIs should be within scope. Due to the much higher prevalence of Retail TPIs, we believe that non-domestic consumers could benefit from being adequately informed about TPIs and that better awareness of the rationale for and against entering into any engagement with TPIs would be beneficial overall.

Measure 1: Information and Awareness

Question 2a: Do you think development, publication and promotion of relevant Retail TPI information on the UR's website would be beneficial to consumers? Please provide a clear rationale for your answer.

Response:

We agree with the rationale in Sections 3.6–3.9 that improved consumer understanding supports a more transparent and competitive market. Given the diversity of the non-domestic customer base in Northern Ireland - ranging from microbusinesses to large energy users - centralised, impartial information from the UR could help consumers make more informed decisions when engaging with TPIs.

Question 2b: Do you suggest any alternative/additional methods of sharing this TPI information with non-domestic consumers? If so, please describe.

Response:

No additional proposals beyond the collaborative approach described in Section 3.9, which appropriately recognises the role of suppliers, representative organisations and advice agencies in signposting UR information to customers.

Measure 2: Enhanced Monitoring and Reporting

Question 3a: Would you consider enhanced monitoring and reporting (to include i) regular supplier information submission and ii) a programme of engagement) to be beneficial in ensuring that consumers are adequately protected? Please provide clear rationale for your answer.

Response:

We would consider enhanced monitoring and reporting as potentially beneficial steps in increasing protection for consumers. Regular submissions from suppliers would allow UR to keep track of developments with regards to TPIs and how they operate, whilst providing UR with potentially crucial information to help address any concerns in the future. Similar information could also be obtained through an engagement programme, with open discussions encouraged among stakeholders. The required level of input needs to be proportionate and fair.

Question 3b: Should a regular supplier information submission be voluntary or implemented through a licence requirement?

Response:

If regular supplier information submissions on TPIs were made compulsory through a licence requirement, this would guarantee a larger pool of data as opposed to a voluntary scheme.

Question 3c: Can you suggest any alternative methods of monitoring and reporting TPI activity?

Response:

A possible suggestion would be to require Retail TPIs to register with UR and maintain a public profile on a central database, voluntary or otherwise. This would allow consumers to inform themselves on the records of TPIs before entering into any engagement with them, should they wish to do so.

Question 3d: Would it be beneficial for the TPI information gathered by UR to be anonymised and published (in addition to being used internally by UR for market monitoring)?

Response:

It may prove beneficial for a high-level public report to be produced on an ad hoc basis by UR which would promote transparency on TPIs while also deterring malpractice and promoting transparency.

Measure 3: Information on Third Party Costs

Question 4a: Are you of the view that TPI commissions being published would increase levels of transparency and benefit consumers? Please provide clear rationale for your answer.

Response:

In principle, we believe that greater transparency around TPI commissions would help consumers better understand how TPIs are paid and what value they provide. As noted in the

paper, improved clarity on fees could help promote trust and informed decision-making. However, any measure should remain proportionate, reflecting the scale of TPI activity in Northern Ireland and any potential cost implications.

Question 4b: Which publication format should be used for Third Party Costs: i) consumer bills and on request, ii) a customer's Principal Terms and upon request iii) both i and ii or iv) another publication? Please provide information to support your answer.

Response:

If such a move were mandated, we could adapt to either approach, however we already include Retail TPI commission levels in all of our proposals currently, thus this would be our preference of the two.

Question 4c: Which publication cost structure would be most beneficial to consumers: i) a lump sum for contract duration ii) a cost per unit iii) combined approach (both i & ii) iv) other? Please provide information to support your answer.

Response:

We have no firm preference on cost structure. Clarity and consistency should guide any approach taken. The key outcome should be ensuring that consumers can clearly identify and understand the cost implications of engaging with a TPI and make an informed decision.

Question 4d: What changes to billing systems - or wider systems and processes - would be required in order to enable the publication of TPI commissions on a customer's bill? Do respondents have any view of the difficulty and cost of these changes?

Response:

Introducing TPI commission information on customer bills would require changes to billing and data systems, depending on how third-party payments are structured. As recognised in Section 3.28, implementation feasibility and cost implications would vary between suppliers and would require detailed evaluation before any formal proposal is progressed.

Measure 6: General Authorisation Regime

Question 5a: Do you agree with the exclusion of the potential measures (4-6) for the reasons described above? If not, please provide reasoning.

Response:

We agree with UR's recommendations to exclude measures 4-6 for the reasons outlined.

Question 5b. Are there any alternative measures, not discussed that you think should be considered? If so, please provide a description.

Response:

Any measures we would be supportive of have been raised within this Consultation Paper.

Wholesale TPIs

Question 6: Are you aware of any issues/concerns impacting micro/small scale generators through their arrangements with TPIs? If yes, please specify.

Response:

We are not aware of any current issues impacting micro or small-scale generators through their arrangements with TPIs.

Question 7. Do micro/small scale generators require regulatory protection when engaging with TPIs in the energy market in Northern Ireland? Please provide any information to support your answer.

Response:

As per our response to Question 1, we do not feel that, at this stage, there is enough evidence to include Wholesale TPIs within the scope of this project, however if the UR deem this necessary, we will adapt accordingly.

Question 8: If you answered yes to Q7, what regulatory protections do you feel would benefit micro/small generators in Northern Ireland? Please provide examples to support your answer where necessary.

Response:

N/A

Question 9. Do you think that any of the potential measures outlined in Section 3 in relation to Retail TPIs could or should be considered for application to Wholesale TPI operations? Please provide any information to support your answer.

Response:

No, unless the UR has evidence to suggest otherwise. As always, Click Energy will take a pragmatic view and adapt as necessary.