



ELECTRICITY
ASSOCIATION
OF IRELAND



ELECTRICITY
ASSOCIATION
OF IRELAND

Response to Utility Regulator Consultation

Third Party Intermediaries in the Energy Market

Electricity Association of Ireland

Status: Final

Date: 06/11/2025

A decarbonised future powered by electricity.

Electricity Association of Ireland

Registered Office: 6 Merrion Square North, Dublin 2, D02 FF95

Registered No.443598 VAT No. IE9682114C

T +353 1 524 1046 | E info@eaireland.com | [@electricityAI](https://www.eaireland.com)

www.eaireland.com

Directors: Kevin Hannafin, Bryan Hennessy, TJ Hunter, Brendan Kelly, Cólín O Górmáin, Peter O'Shea, Kieran Tubridy.



The Electricity Association of Ireland (EAI) is the representative body for the electricity industry and gas retail sector operating within the Single Electricity Market (SEM) on the island of Ireland.

Our membership comprises utilities that represent 90% of generation and retail business activities and 100% of distribution within the market. Our members range in size from single plant operators and independent suppliers to international power utilities. Our members have a significant presence in Ireland, Northern Ireland and Great Britain across the sector value chain. We represent the interests of the all-island market in all relevant jurisdictions, including the EU via our membership of the European electricity representative body Eurelectric.

We believe that electricity has a fundamental role in providing energy services in a decarbonised, sustainable future, in particular through the progressive electrification of transport and heating. We believe that this can be achieved, in the overall interest of society, through competitive markets that foster investment and innovation.

We promote this vision through constructive engagement with key policy, regulatory, technology and academic stakeholders both at domestic and EU levels.

Our ambition is to contribute to the realisation of a net-zero GHG emissions economy by 2050 or sooner, in order to limit the impact of rising temperatures. Electricity offers opportunities to decarbonise the Irish economy in a cost-effective manner.

Introduction

The Electricity Association of Ireland (EAI) welcomes the opportunity to respond to this consultation on Third Party Intermediaries in the Energy Market. EAI highlights that Third Party Intermediaries (TPIs) play a key role in supporting a healthy and competitive energy market by encouraging customer switching and seeking out competitive offers. TPIs act as intermediaries between energy suppliers and their customers, helping businesses and consumers navigate, compare, and negotiate energy contracts.

EAI welcomes the work undertaken by the Utility Regulator (UR) to date, which indicates that TPI activity in Northern Ireland has not yet reached a level warranting regulatory intervention. This positive outcome allows focus to remain on other priorities within the UR's work programme. Although this is not an immediate concern, EAI considers that the matter could be revisited in the future if circumstances change and acknowledges that the UR is effectively monitoring the market. EAI maintains that current TPI activity does not meet the threshold for intervention, and efforts should focus on monitoring the market and keeping the work programme on track.

Furthermore, EAI sets out its responses to the following consultation questions:

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

EAI reiterates that the current threshold for regulatory intervention has not been defined within the consultation paper, however based on the perceived threshold used in the 2018 review, the current evidence would indicate that it has not been met in Northern Ireland. Based on the information gathered to date, the scale and maturity of TPI activity in the Northern Ireland market remain limited and do not present evidence of systemic consumer harm or market distortion that would necessitate additional regulatory measures at this stage.

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.

EAI considers that the development, publication, and promotion of relevant Retail TPI information on the UR's website could be beneficial to consumers, provided that the information is clearly targeted to the appropriate customer type, as different consumers are likely to possess varying levels of knowledge and experience with TPIs and the broader energy market. It should be noted that the information may be difficult for UR to collate as TPIs offer a variety of contractual and commission structures to customers. The individual customer will need to be empowered to understand their individual contractual arrangement with the TPI.

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

EAI believes that promoting TPI information can be done by UR, given suppliers do not have a direct relationship with TPIs. Suppliers are not well-placed to influence TPI activity, but they may be able to publish universal information, created by UR on their own websites to support consumer awareness.

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.

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

EAI response to 3a and 3b:

EAI considers that enhanced monitoring and reporting, including regular supplier information submission and a programme of engagement with suppliers, is not currently necessary to ensure consumers are adequately protected. Suppliers have already provided substantial

information through an Information Request, which, together with existing UR data, offers sufficient quantitative data into TPI activity. This data is however the limit of the information that suppliers have access to and providing similar information provides limited insight for UR, making its recurring collection a disproportionate task.

Given the current rate of growth and scale of TPIs operating in Northern Ireland, one-off requests over a comparable period, similar to the 2018 versus 2025 assessments, remains adequate to monitor the market and assess scale of TPI activity. Additional, repeated reporting by suppliers would therefore not provide meaningful benefits at this stage.

If a regular supplier information submission were to be implemented, EAI believes it could be requested through the existing mechanisms for provision of information rather than mandated through a specific licence requirement. At present, an additional licence condition is not required.

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

The information available to suppliers and therefore provided as part of a Request for Information is limited to number of contracts where the TPI has been involved or similar quantitative data points.

Rather, given the contractual arrangement is between the customer and TPI, the better source for identifying consumer concerns is via the UR's engagement with customers who will provide insight that suppliers are not privy to.

Through monitoring of the TPI/customer relationship, trends can be monitored and at such a time that intervention is needed, the suppliers can be consulted.

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)?

EAI believes that any TPI information published by the UR should provide a clear benefit to consumers or stakeholders.

As noted above, EAI does not consider that the current level of TPI activity in Northern Ireland warrants regulatory intervention. If anonymised publication is being considered, it should only be undertaken if it offers meaningful insight or practical value to consumers or the market.

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.

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.

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.

Given the already complex nature of energy billing, any cost structure should be designed to avoid adding further complexity and remain clear and easily understandable for consumers. Itemising and highlighting one element of the customer's complex contract such as TPI commission could lead to more confusion for the customer.

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?

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

EAI agrees with the exclusion of the potential measures (4–6) for the reasons outlined in the consultation. This work was undertaken in 2018 and proved effective, so there is no need to revisit it at this time

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

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

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.

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.

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.

Conclusion

It is imperative that given the large body of work that industry need to deliver in line with the Energy Strategy and the UR's own workplan over the coming years that all workstreams must be justified and beneficial to consumers. We need to be pragmatic as an industry and prioritise the most impactful projects and where a materiality threshold for potential harm has not been met, then we can take comfort the regulatory intervention is not required at this time.

EAI notes that current TPI activity in Northern Ireland has not been proven to warrant regulatory intervention at this time. The Utility Regulator is effectively monitoring the market,

through the consumer forums and should any future trends emerge which need to be addresses, the and the matter could be reconsidered at a date in the future.

If you require any clarification or have questions, please do not hesitate to contact th is office.

Yours sincerely,

Emma O'Leary

Policy Analyst

Electricity Association of Ireland