

Lauren Skillen-Baine
Non-Domestic Consumer Protection Team
Utility Regulator
1st Floor Millenium House
Great Victoria Street
Belfast
BT2 7AQ

9 June 2026

Dear Lauren,

Re: Proposed Supply Licence Modifications outlined in the 'Third Party Intermediaries in the Energy Market' Position Paper

Power NI welcomes the opportunity to respond to the proposed modifications to its supply licence, specifically the introduction of a requirement for electricity suppliers to publish Third Party Costs on a customer's Principal Terms and upon request. Power NI recognises that the Utility Regulator (UR) has a statutory duty to protect consumers, including non-domestic consumers, and is supportive of measures that enhance transparency and fairness within the market.

Power NI has extensive experience working with over 30 Third Party Intermediaries (TPIs), ranging from large organisations to small, local businesses. While TPIs play an important role in driving competition and influencing market activity, it is essential that appropriate protections are in place to ensure they operate in a fair and transparent manner.

As such, Power NI acknowledges the UR's responsibility to safeguard consumers while maintaining market integrity. Ensuring that customers receive a fair and transparent energy deal should remain a central priority. Given the complexity of the commercial energy market, Power NI is broadly supportive of the work currently being undertaken by the UR in relation to the TPI sector.

- Condition 1: Interpretation and Construction of the Licence

No specific comments on proposed amendments.

- Condition 27: Terms and Conditions of Electricity Supply Contracts

No specific comments on proposed amendments.

- **Condition 38C: Non-Domestic Customers - Information on Third Party Intermediary Costs**

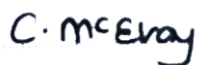
Power NI considers it important to highlight that a consumer's engagement with Third Party Intermediaries (TPIs) occurs independently of the supplier. Suppliers are not involved in the discussions or negotiations between a customer and a TPI. In this context, Power NI welcomes the UR's decision not to require Third Party Cost information to be published on customer bills, recognising the practical challenges associated with doing so. These include the variation in commission structures, differing commercial arrangements, and the retrospective nature of such costs, all of which would make accurate and consistent billing challenging.

Power NI has already routine measures in place to enhance transparency in this area. Commission structures and levels are clearly set out within the Letter of Authority, which is signed by the customer in advance. This approach ensures that consumers are provided with clear and transparent information prior to entering into any commercial agreement. Based on Power NI's experience, this represents best practice, particularly given that some consumers may incur significant costs through TPI arrangements.

Power NI also welcomes the UR's clarification regarding the requirement for a consistent level of information to be published across all suppliers. This approach supports a level playing field and avoids creating inconsistencies that could otherwise allow TPIs to favour suppliers with lower transparency standards. Power NI supports the position that such information should not be included on bills, statements, or routine communications, but instead be provided upon request by a non-domestic customer.

Power NI remains committed to positively engaging with the UR on this work.

Yours sincerely

A handwritten signature in blue ink that reads "C. McElroy". The signature is written in a cursive, slightly stylized font.

Claire McElroy
Power NI