TPI TRADE ASSOCIATION
NORTHERN IRELAND
Energy Brokers & Consultants

15th June 2026

Dear Sirs,

We write on behalf of members of the TPI Trade Association of NI, in response to the notice dated 14th May 2026 and issued pursuant to Article 14(2) of the Electricity (Northern Ireland) Order 1992 (as amended) regarding the proposed changes to the disclosure of uplift and total commission amounts made by the Northern Ireland Authority for Utility Regulation ("the Authority").

At the outset, we are supportive of the overall aim of improving transparency for customers and recognise the importance of customers having clear and meaningful information about the costs associated with their energy arrangements.

However, we do have some concerns as to how the proposals would operate in practice. In particular, we think there is a real risk that the current proposal could give an incomplete – and potentially misleading – picture of how pricing works across the supply chain.

As currently framed, the proposals focus on the commission payable to the directly engaged third party intermediary ("TPI"). While that will provide some additional visibility, it does not fully reflect the commercial reality. In most cases, margin is generated at a number of points within the supply chain, not just at the level of the customer-facing intermediary.

The difficulty with focusing on a single element is that customers may reasonably assume that the disclosed TPI commission represents the total third-party cost or margin within the transaction. In practice, that will not usually be the case. ***There is therefore a risk that the disclosure could distort, rather than improve, customer understanding.***

Against that background, we think there is scope to refine the proposals so that they better achieve the Authority's stated objective. In particular, it would be helpful if the definition of "Third Party Costs" was revisited to ensure that it reflects, or at least acknowledges, the broader range of intermediaries and arrangements through which margin can arise. Alternatively, it would assist if the disclosure requirement expressly allowed for clear explanatory wording to confirm that the figure disclosed relates only to the directly engaged intermediary and does not represent the full extent of margin within the supply chain.

More generally, we think it is important that any disclosure regime provides a fair and balanced view of costs, rather than isolating a single component in a way that could therefore be open to misinterpretation.

We would also encourage the Authority to consider proportionality and consistency across the market, so that similar activities are treated in a similar way and the burden of disclosure does not fall disproportionately on one category of intermediary or stakeholder.

By way of context, our members already disclose uplift to clients at an early stage of engagement. Our comments above are therefore not intended as resistance to transparency, but rather as an attempt to ensure that the final framework reflects how the market operates in practice and provides genuinely helpful information to customers.

It is our firm belief that our members drive competition in the marketplace. Our current listed members below have provided information of "switches" between suppliers in the period July 2024 to December 2025 to match the disclosure of information on the most recent UREGNI Quarterly Retail Market Monitoring Report released 12th March 2026. This revealed that of the total switches of 9487 sites made up of electricity and natural gas 2116 sites (22%) were facilitated through member of the TPI Trade Association of NI. To consider there are further TPI's in the market which are not yet affiliated to the TPI Trade Association of NI given its infancy along with GB based TPI's whom look after multinationals it could be very possible that 40-50% of all switching activity are derived from TPI's.

We hope these comments are of assistance and would be happy to engage further as the proposals develop.

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On behalf of TPI Trade association of NI members

The P2B Group
MCG Energy
Renewable Partnerships
Business Wise NI
Power Booker
Trusted Resources
MJ Utilities
CWE Energy Services
BJG Consulting
John Quinn

Gareth Strain