TRUSTED RESOURCES
Commercial energy management consultancy

Non-domestic Consumer Protection Team
Utility Regulator
1st Floor, Millenium House
Great Victoria Street
Belfast
BT2 7AQ

15th May, 2026

Dear Sir/Madam,

I am writing in response to the Utility Regulator's Position Paper on Third Party Intermediaries in the energy market, May 2026.

I fully support greater transparency for customers in the non-domestic sector; however, I have concerns that the proposal does not represent a complete picture on how pricing is arrived at for the customer.

Having previously worked as a Key Account Manager for a Northern Ireland energy supplier and managing a sizeable portion of their TPI/broker channel, I am in the somewhat unique position of having seen the significant benefits that brokers bring to Northern Ireland customers in a sector they know little about.

In a sizable proportion of cases, customers are on 'out of contract' rates and are of the mindset that there is little choice between suppliers. At a bare minimum, TPIs provide an overview of the market and products available from suppliers that customers are simply not aware of.

TPIs also provide 'all of market' pricing to allow the customer to make an informed decision. With moderate commission levels included, this is usually on a par with direct supplier pricing and in some cases, lower. Negotiated rates are also commonly lower than the initial rates received from suppliers.

Customer accounts are fully managed for the duration of the contract, providing bill reviews, bill validations, advice on energy efficiency, information on available grants and impartial guidance on regulations, amongst many other facets.

My concern is that by focusing solely on one shareholder, this may give a distorted view on how pricing is arrived at for the customer. Instead of providing full, balanced and consistent transparency on all margins, this seems to segregate TPIs as an outlier; the body who arguably provide the greatest clarity to the customer.

In my previous role, I witnessed that many TPIs already perform a level of self-regulation by providing commission levels on their respective letters of authority. This, in my view is an accurate reflection TPI's intentions and of their renumeration as the customer's future consumption cannot be accurately arrived at.

Many factors can alter this total, including changes to working hours and practice which has been seen since the lockdowns of 2020. Additionally, the installation of energy efficiency measures makes a significant difference to a customer's overall annual consumption, including the investment in LED and solar panels.

The proposed requirement for a total commission amount to be stated would be at best inaccurate and I feel would unfairly state a predetermined amount to the customer as fact, whilst ignoring all other margins within the supply chain.

Transparency for the customer is wholly welcomed; however, it surely must be consistent across the board.

Feel free to contact me, should you wish to discuss further.

Yours sincerely,

Jonathan Gregg

Director

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