UTILITY REGULATOR COMPLIANCE AND ENFORCEMENT ANNUAL REPORT

Utility Regulator Decision Paper
November 2026

www.uregni.gov.uk

Utility Regulator

About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Millennium House in the centre of Belfast. The Chief Executive and two Executive Directors lead teams in each of the main functional areas in the organisation: CEO Office; Price Controls; Networks and Energy Futures; and Markets and Consumer Protection and Enforcement. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.



ABSTRACT

This decision paper sets out the Utility Regulator's decisions following consultation on certain aspects of our external Compliance and Enforcement Annual Report. This paper summarises the feedback received during the consultation process, explains how we have taken stakeholder views into account, and confirms our decisions on the content and publication approach for the Annual Report. This includes the presentation of routine compliance monitoring information, annual Statement of Licence Compliance information, reporting by licence type, anonymisation and pseudonymisation, and information on cases closed through alternative resolution.

AUDIENCE

This document is most likely to be of interest to regulated companies, consumer organisations and representatives, community and voluntary organisations, consumers, other regulatory bodies, government, and other statutory bodies.

CONSUMER IMPACT

The Compliance and Enforcement Annual Report forms part of our wider licence compliance monitoring and reporting framework and is intended to provide greater transparency in relation to our Compliance and Enforcement activity. It aims to support accountability across the markets we regulate, and provide consumers, licensees and wider stakeholders with accessible information on the work undertaken during the reporting year.

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Executive Summary

This decision paper outlines the Utility Regulator's (UR's) decisions relating to specific aspects as consulted on regarding the publication of its first Compliance and Enforcement (C&E) Annual Report. The Annual Report forms part of our wider licence compliance monitoring and reporting framework and is intended to improve transparency, support accountability and provide consumers, licensees and wider stakeholders with accessible information on our compliance and enforcement activity during the reporting year.

We consulted on specific aspects of our proposed Compliance and Enforcement Annual Report in July 2026. Eighteen responses were received from industry, consumer bodies and other stakeholders. Overall, respondents were widely supportive of the principle of publishing an Annual Report, recognising the value of greater transparency and accountability. Respondents emphasised the importance of ensuring that published information is clear, proportionate, appropriately contextualised and not misleading to ensure value to consumers and provide meaningful insight into licensees' performance.

Consultation questions and decisions

The consultation paper posed six questions relating to specific aspects of the proposed report. Having carefully considered all consultation responses, we have reached decisions in relation to questions posed which will form the basis of the final report. A summary of our decisions is provided below:

Decision: routine and annual compliance monitoring

We will proceed with publishing compliance data covering both routine compliance monitoring and the annual Statement of Licence Compliance (SoLC) process. This information will be presented with definitions and explanatory narrative (where appropriate), to distinguish between potential compliance issues reported during routine compliance monitoring, those reported as part of the SoLC process, cases which are subject to our enforcement process (open and closed cases), and other forms of regulatory and enforcement activity. The report will make clear that the inclusion of a matter does not, of itself, mean that a breach has been established or that enforcement action has been taken. Relevant contextual information will be provided to support stakeholders in assessing the proportionality and significance of the issues identified.

Decision: anonymised / pseudonymised published data

Routine compliance monitoring information and annual SoLC information will be reported on in an anonymised, pseudonymised or aggregated basis. Licensees will be grouped by agreed reporting categories where appropriate. We recognise

that, in a small number of cases, licensees may still be identifiable due to their monopoly position or the limited number of participants in a reporting category. Where this occurs, we will ensure that information is presented fairly, proportionately and with appropriate context.

Decision: publishing by licence type

The Annual Report will include relevant detail by licence type where this adds value and supports understanding of compliance activity across the sectors we regulate. Information may also be presented by licence condition, theme or a combination of these approaches, depending on the nature of the issue and the level of detail that is appropriate. We will avoid presenting numerical information in isolation where it may be misleading and will provide relevant context where needed to avoid misleading comparisons.

Decision: publishing information about cases closed at Initial Enquiry Stage

We will include information on cases closed via alternative resolution at the Initial Enquiry Stage, in accordance with the Enforcement Policy Approach and Procedure (EPAP). The report will make clear that alternative resolution does not represent a formal enforcement determination or a formal finding of breach. The report may also include information on ongoing investigations where the relevant publication threshold in the EPAP has been met and will clearly state where a matter remains ongoing and no formal finding has been made.

Decision: the proposed information in relation to consumer interest.

In response to wider comments on the consumer interest, the Annual Report will include information that supports transparency, accountability and consumer understanding. We will retain annexes where appropriate so that relevant supporting information is available in one centralised location. We do not intend to include trend data, examples of successful remediation, positive compliance indicators or best practice examples in the first Annual Report as suggested by some respondents. The inclusion of such material would require further development, additional data, or could risk disclosing commercially sensitive or confidential information provided through compliance monitoring processes. Introductory text will provide relevant contextual information in this regard.

Equality considerations

We have considered equality impacts and asked a specific consultation question (question 6) on the equality impacts of our proposals. No respondents identified any negative equality impacts, and we continue to consider that the Annual Report will help all consumers by improving access to information about compliance and enforcement activity. In preparing the report, we will use Plain

English, apply Plain Numbers principles where appropriate, and provide clear explanations to support accessibility and understanding.

Next steps

Following publication of this decision paper, we will finalise the structure and content of the first C&E Annual Report which we will publish in early December 2026. We will keep the format and level of detail under annual review as the reporting process develops, including the potential to introduce year-on-year trend information once sufficient historical data is available.

1. Introduction

Purpose of this document

1.1 On 28 July 2026 we published a consultation paper[1] on the proposed publication of our first C&E Annual Report. The consultation paper sets out the background to the proposed report, our rationale for publishing it, and sought stakeholder views on certain aspects of the proposed content and approach.

1.2 The proposed C&E Annual Report forms part of our wider licence compliance monitoring and reporting framework, which was published and launched on 10 September 2024. The report is intended to provide greater transparency in relation to our C&E activity, support accountability across the markets we regulate, and provide consumers, licensees and wider stakeholders with accessible information on the C&E work undertaken during the reporting year.

1.3 The purpose of this paper is to:

a. outline the responses received to the consultation paper on the proposed Annual Report and summarise the key issues raised by respondents;

b. set out our response to the comments received;

c. confirm our decisions on the content and publication approach for the Annual Report; and

d. explain the next steps for publication of the first report and future annual reporting.

Background

1.4 The UR has statutory responsibility for the regulation of gas, electricity, water and sewerage services in Northern Ireland. A fundamental aspect of this role is the ongoing monitoring of regulated companies' compliance with the licence obligations under which they operate. This activity applies across all licence types and licence holders and supports our statutory objective to protect the short- and long-term interests of consumers.

1.5 In our Forward Work Programme (FWP) 2024/25 we committed to developing and implementing a new and enhanced licence compliance

[1] https://www.uregni.gov.uk/consultations/consultation-publication-utility-regulator-compliance-and-enforcement-annual-report

monitoring and reporting framework for all licensees. This framework was introduced to support a more proportionate, consistent and effective approach to compliance monitoring across the sectors we regulate.

1.6 The framework is built around two core pillars: routine monitoring of licence compliance and an annual assurance process known as the SoLC. The annual assurance process requires licensees to provide confirmation each year of the status of their compliance with their licence obligations, supported by senior sign-off at Chief Executive Officer, Managing Director or equivalent level.

1.7 As part of our compliance monitoring and reporting framework, we signalled our intention to publish a C&E Annual Report. The report is intended to provide stakeholders with an overview of our compliance monitoring and enforcement activity during the previous calendar year, including routine compliance monitoring, annual compliance reporting, audit activity, and relevant investigation and enforcement activity that can be published in accordance with our EPAP.

1.8 In developing the proposed Annual Report, we undertook benchmarking across a range of regulatory bodies within the United Kingdom and Ireland. This exercise considered how other regulators report publicly on C&E activity and helped inform the proposed structure and content of our own report. Further information on our benchmarking exercise can be found in our consultation paper.

Consultation process

1.9 Our consultation paper sought views from a wide range of stakeholders including licensees, consumers, advice organisations representing consumer interests and other stakeholders from the wider energy industry.

1.10 The consultation asked stakeholders to provide views on six questions covering the proposed compliance data for inclusion in the report, the extent to which published information should be anonymised or pseudonymised, the inclusion of detail by licence type, publication of cases closed at the Initial Enquiry Stage through agreed alternative resolution, the consumer interest in publishing the proposed information, and equality considerations.

1.11 We received eighteen responses to the consultation, with representations from industry and consumer bodies. Responses were received from:

- An Independent Commercial Generator
- Budget Energy and Flogas

- Click Energy
- Consumer Council for Northern Ireland
- Electric Ireland
- Electricity Association of Ireland
- ESB GT
- Evolve
- firmus
- GMO NI
- GNI UK
- Kinecx
- National Energy Action NI
- Northern Ireland Electricity Networks
- Phoenix Energy NI
- Power NI
- SONI
- TTEP

1.12 All responses have been published[2] as annexes to this paper and can be found on our website – www.uregni.gov.uk.[3]

1.13 We have carefully considered all consultation responses received when reaching our final decisions. This paper summarises the feedback provided by respondents, sets out our response to the issues raised, and confirms our decisions on the approach to publishing the C&E Annual Report.

1.14 We have summarised the responses to the Consultation paper in Section 2 of this paper and have addressed those common themes that are most significant or opinions that have been shared by several respondents.

1.15 We thank stakeholders for their engagement in the consultation process. The responses received have informed our final decisions and have

[2] All responses (confidential or otherwise) to the consultation have been considered in arriving at the positions outlined in this Decision Paper.
[3] The personal information of the Independent Commercial Generator has been redacted.

assisted us in ensuring that the Annual Report is clear, proportionate and useful for consumers, licensees and wider stakeholders.

Structure of this paper

1.16 This paper follows the structure of the consultation paper and sets out the key aspects where stakeholder views were sought. It provides a summary of the responses received, our comments on those responses and our final decisions.

Section 1 (this section)	Introduces the purpose of this decision paper and provides relevant background and context;
Section 2	Provides a summary of the consultation responses and our decisions on the proposed content and publication approach for the C&E Annual Report;
Section 3	Details equality considerations; and
Section 4	Sets out implementation and next steps, including the publication of the first C&E Annual Report and future annual reporting.

2. Consultation questions and decisions

2.1 In our consultation paper, we set out a number of questions covering specific aspects of the proposed content and publication approach for the C&E Annual Report. This section sets out each of those questions, provides an overview of the feedback received, our response, and relevant final decisions.

Question 1

Do you agree with our proposed compliance data providing detail of both our routine and annual compliance monitoring?

Please provide clear reasoning and examples where possible evidencing the impact of your views.

Stakeholder feedback

2.2 The vast majority of responses broadly support the proposal to publish compliance data covering both routine compliance monitoring and the annual SoLC process. Respondents generally considered that reporting on both sources could provide a more complete picture of compliance activity, improve transparency, and help stakeholders understand how compliance issues are identified, monitored and resolved throughout the year. Both consumer representative bodies agreed that our compliance data should provide detail of both routine monitoring of licence compliance and annual SoLC findings. One also agreed with our position that clear reporting on compliance and enforcement builds consumer trust in the market and the other highlighted that reporting on both provides a more complete picture of licence performance and regulatory oversight throughout the year.

2.3 A recurring theme across the responses was the need for sufficient context and explanatory narrative to accompany any published data. Many respondents cautioned that numerical reporting alone, particularly the number of potential compliance issues, may not provide a meaningful or balanced indication of compliance performance. Several responses noted that potential compliance issues can vary significantly in factors such as seriousness, duration and consumer impact, meaning that raw figures alone could be misleading if presented without context. One of the consumer representative bodies stated that as well as considering the content of the report we needed to consider how this information reaches consumers, and the value of this report rests on the benefit to consumers through the information provided. They also said we should consider how

we communicate technical information to consumers in a clear and understandable way using the principles of Plain English and Plain Numbers to enable consumers to make informed decisions.

2.4 There was strong emphasis on the importance of clearly distinguishing between potential compliance issues and confirmed licence breaches or enforcement outcomes. Respondents were concerned that consumers, stakeholders or the media could incorrectly interpret a potential compliance issue as evidence that a breach had occurred. Some responses suggested that the report should include a clear disclaimer explaining that a potential compliance issue does not constitute a confirmed breach and that any breach can only be established through the relevant enforcement process.

2.5 Materiality and proportionality were also recurring points of feedback. A number of respondents suggested that minor or administrative issues with little or no consumer impact should either be excluded from individual reporting, aggregated at a high level, or clearly differentiated from more significant matters. Respondents highlighted that published information should explain the level of consumer detriment, whether the issue was isolated or systemic, whether it was resolved, and what remediation or preventative action was taken. Three respondents suggested that only reporting numbers of potential compliance issues would not inform the reader if the issue arose due to a licence drafting anomaly / licences requiring updates, or a misalignment between company processes and licence requirements, or if the issues had been referred to C&E for investigation. Another respondent outlined that reporting on licence compliance is best achieved when the licences are consistent and resources should be allocated to ensure that outstanding modifications are progressed in parallel with developing the reporting framework. It was highlighted that licences should be aligned with wider legal obligations, as outdated licence drafting may complicate the interpretation of compliance data and could distort perceptions of a licensee's actual legal compliance position.

2.6 Another common theme was the need to recognise positive compliance behaviours, including proactive self-reporting by licensees. Several responses noted that a higher number of reported issues may, in some circumstances, indicate a strong compliance culture and effective internal controls rather than poor compliance performance. Respondents therefore encouraged the UR to distinguish between issues identified through its own monitoring or audit activity and those voluntarily self-reported by licensees.

2.7 Some respondents did query whether there is sufficient value in publishing both routine monitoring data and annual SoLC findings where

there is overlap between the two processes. These responses suggested that the report should focus on information that provides meaningful transparency for consumers, such as confirmed compliance outcomes, investigations and enforcement activity, and clear market-wide themes, rather than matters that may ultimately not represent a compliance failing. One licensee also questioned whether there was merit in reporting on minor or inconsequential instances of potential compliance issues which have not been investigated and in respect of which no breach has been determined.

2.8 There was support for reporting common compliance themes and trends by licence type, particularly where this helps stakeholders understand areas of regulatory focus and enables licensees to review their own processes and strengthen controls. Some responses suggested that year-on-year trend data would become increasingly useful once sufficient historical information is available.

2.9 The importance of ensuring that the Annual Report remains aligned with the EPAP and wider regulatory framework was also included in respondents' feedback.

UR response

2.10 We welcome the broad support for including both routine compliance monitoring and annual SoLC information in the C&E Annual Report. We agree that, taken together, these sources provide a fuller overview of our compliance oversight activity and will help consumers, licensees and wider stakeholders understand the range and extent of compliance work undertaken during the reporting year.

2.11 We also recognise the concerns raised about the potential for published data to be misinterpreted if presented without sufficient context. The Annual Report will therefore include appropriate definitions and distinctions between potential compliance issues, confirmed breaches and enforcement outcomes and other forms of regulatory activity. The report will make clear that breaches are only confirmed through the relevant regulatory enforcement process and that the inclusion of a matter in the Annual Report does not, of itself, indicate that enforcement action has been taken or that a breach has been established.

2.12 In particular we will ensure appropriate context is provided where necessary to explain the relevant numerical data. Where we consider it relevant, we will explain the nature of issues reported, including whether an issue has been identified through routine compliance monitoring, through our audit activity or via our SoLC process. We agree with licensee feedback that consumers would benefit from information on the level of self-reporting across the market and how this would help recognise

positive compliance behaviours. However, we are cognisant that self-reporting is only one method of identifying and reporting on potential compliance issues. Subcategorising this further could inadvertently identify specific suppliers or individual complainants / whistleblowers. Therefore, at this time we have decided not to include a breakdown of issues by identification method beyond those identified through routine compliance monitoring and via the SoLC process. However, further narrative will be included in the Annual Report to highlight to readers that we recognise the importance of self-reporting and the often-positive behaviour of many licensees in this regard.

2.13 We agree that a potential compliance issue should not be treated as evidence of a confirmed breach and will ensure that this distinction is made within the report. We disagree with the licensee who questioned the merit of reporting on minor or inconsequential instances of potential compliance issues which have not been investigated and in respect of which no breach has been determined. Our reporting must be complete, transparent and fair across all licensees and licence types. By restricting the compliance data published we would not be providing the full spectrum of compliance activity. Selective reporting removes transparency and the reporting of all compliance issues demonstrates the consistent application of regulatory standards.

2.14 We also agree that proportionality is an important consideration in determining how compliance information is presented. The Annual Report should provide a balanced and transparent overview of our compliance and enforcement activity, without suggesting that all issues are of equal significance or requiring an unnecessarily detailed breakdown of every matter identified. Narrative will be included to provide relevant context to address this point.

2.15 In response to the highlighting of potential compliance issues as a result of a licence drafting anomaly / licences requiring updates or misalignment between company processes and licence requirements, we conclude this would not be possible to report on in a meaningful way as each licence type is distinctly different containing varying conditions. We hold licensees to account for meeting the requirements of their licence. It is the responsibility of the licensee to ensure their systems and processes align with these requirements. Should a licence require updating or not align to current market conditions, the licensee should engage with the relevant teams within the UR. This engagement does not supersede the licence requirements and any deviation from the licence conditions must be reported. However, where a modification to an individual licence condition is required, or engagement with the UR has taken place and an approach to demonstrating compliance has been agreed, that should be reflected in the compliance reporting by the licensee.

2.16 We will present information at a level that is contextualised, meaningful, proportionate and useful to consumers, licensees and wider stakeholders within the Annual Report. This may include highlighting key themes, areas of regulatory focus, and issues of particular significance, while avoiding excessive granularity where this would not add value. The provision of factual information alongside an appropriate level of context will assist the reader in discerning relevant information such as the potential level of consumer detriment. Information on key themes will help identify if issues are isolated or systemic. Due to the anonymisation of data and grouping of licence type (see the response to questions 2 and 3), information on the resolution of issues and what remediation or preventative action was taken will not be provided as this may require the identification of a specific licensee. We will however further consider the provision of pseudonymised information in future reports when year-on-year trend data or other further information is available.

2.17 We note the comments on the overlap between routine monitoring and the annual SoLC process. The two processes serve related but distinct purposes. Routine monitoring provides ongoing oversight of compliance matters during the year, while the SoLC process provides annual assurance from licensees in respect of their licence obligations. We feel that including both in the Annual Report will provide a more complete account of our compliance framework, while allowing us to identify wider themes and trends over time. We will keep the format and level of detail under review as the reporting process develops, including the potential to include year-on-year trend information once sufficient historical data is available. We recognise the value of year-on-year trend analysis and the insight it brings to consumer understanding of compliance performance and welcome stakeholder recognition of its benefit.

2.18 We agree with the consumer representative body who highlighted that we need to consider how this information reaches consumers and the benefit that this will bring. As such, we will consider how technical information is presented in the final C&E Annual Report to ensure that this is clear, understandable and meaningful. We will also use the Plain English and Plain Numbers principles throughout the drafting. In order to ensure the report is widely accessible to consumers, the report will be published on our website, pushed out on our social media platforms (to include the featuring of the summary infographic) and proactively shared with consumer representative bodies via our ongoing stakeholder engagement.

UR decision

2.19 We will proceed with the inclusion of compliance data covering both routine compliance monitoring and the annual SoLC process in the C&E

Annual Report. This information will be presented with appropriate context and explanation where needed to ensure that it is clear, proportionate and not misleading. We will use the Plain English and Plain Numbers principles to ensure that the report is accessible to all. The report will distinguish between potential compliance issues and those cases which have entered our enforcement process and where publication on our website has already taken place. We will include relevant narrative to contextualise the information presented and ensure that it is meaningful, proportionate and useful to consumers, licensees and wider stakeholders.

Question 2

To what extent would it be necessary or desirable to have the published data anonymised / pseudonymised?

Stakeholders should outline and explain (where applicable) their rationale for the views expressed and include examples where appropriate.

Stakeholder feedback

2.20 Overall, the responses indicated broad support for anonymisation or pseudonymisation where no formal enforcement determination has been made. The dominant theme was that publication of identifiable information before a breach has been established could create unfair or disproportionate reputational harm, risk misleading consumers and stakeholders, and undermine procedural fairness. One respondent stated that this could discourage proactive engagement with the UR and self-reporting by licensees. Several respondents remarked that anonymised or aggregated reporting would still deliver transparency by providing insight into sector-wide trends, emerging issues and areas of regulatory focus but a cautious approach to publication should be applied and the publication should not identify, directly or indirectly, individual suppliers.

2.21 A consumer representative body supported a proportionate and consumer-focused approach to anonymisation. They recognised that there may be circumstances where anonymisation is appropriate and would allow us to report on emerging themes and risks. They also felt that transparency provides an incentive both to achieve compliance and to improve performance across the sector.

2.22 Another consumer representative body stated their position on anonymisation was dependent upon the stage a case has reached, not on whether it is open or closed. They stated that early engagement that did

not lead to a formal case should remain anonymised and that this would provide consumers with maximum transparency while not causing undue harm to a company's reputation. They also agreed with our existing approach to ensure cases which have been resolved informally, found to be trivial or dismissed due to lack of evidence remain confidential. They were clear that when a case reaches formal status the licensee should be named. They stated that this should apply for both open and closed cases and only in a narrow set of circumstances should anonymisation be applied, for example if a case is opened and later dropped with no breach found.

2.23 They supported keeping the same narrow discretion that Ofgem and Ofwat have adopted rather than anonymising open cases as a rule.

2.24 A number of respondents accepted that where enforcement action has concluded, or where information has already been published under the UR's EPAP, it may be appropriate for the relevant licensee to be identified. However, the recurring view was that routine compliance monitoring information should remain anonymised or pseudonymised unless and until publication thresholds under the established enforcement process have been met, with one respondent highlighting that a useful principle could be "Anonymous until formal enforcement publication thresholds have been reached". They stated that this would protect due process while maintaining confidence in regulatory reporting.

2.25 Several respondents highlighted the particular characteristics of the Northern Ireland energy market, noting that the relatively small number of licence holders, and the existence of some unique licences, may mean that licensees could be identifiable even where names are removed. This was raised as a standalone point that requested further clarification of how categorising by licence type would work where only one licensee exists in a particular category.

2.26 Other points from respondents worth mentioning include requests for clearer criteria on when anonymisation or pseudonymisation will be used, the possible introduction of materiality or severity categories, and the need for a pre-publication verification process to allow licensees to check factual accuracy and identify commercially sensitive information if they are to be at risk of 'unintended identification.'

2.27 One respondent was not supportive of routine anonymisation or pseudonymisation of compliance outcomes where regulatory investigations identify non-compliance or licence breaches. This respondent highlighted that transparency is fundamental to maintaining confidence in the market. While they felt that anonymisation may be appropriate in limited circumstances such as involving personal data or

ongoing investigations, they said that completed compliance outcomes should identify the relevant licensee.

UR response

2.28 We recognise the concerns raised by respondents about the potential impact of publishing identifiable compliance information where no formal enforcement determination has been made. We agree that the Annual Report should not present routine compliance monitoring information in a way that could unfairly imply that a licence breach has occurred or otherwise create disproportionate reputational risk for the licensees. We also agree that the approach to publication must be consistent with our EPAP and with the principles of fairness, transparency and proportionality. Where a licensee is nevertheless identifiable because of the nature or structure of the market, publication at that level of detail will be considered in line with the applicable statutory powers, duties and restrictions. In these instances, publication ensures consumers have the requisite information to understand compliance activity within all market sectors. This ensures that information provision is expedient while not prejudicially affecting the interests of the licensee.

2.29 We consider that anonymised, pseudonymised or aggregated reporting will generally be appropriate for routine compliance monitoring information and annual SoLC information. This approach will allow the Annual Report to provide meaningful transparency on compliance themes and trends and will also encourage performance improvement across the sector, whilst avoiding the risk that potential compliance issues are interpreted as confirmed breaches. We have noted the comments on materiality or severity categories but consider this unnecessary. As noted in paragraph 2.16, relevant contextual information will allow the reader to draw relevant conclusions while preventing the unintended identification of a licensee.

2.30 We note the particular point raised about the size and structure of the Northern Ireland energy market and the risk that some licensees may be identifiable even where names are removed. To help manage this risk, we intend to group licensees by reporting categories for the purposes of the Annual Report. These reporting categories are expected to be: Demand Side Unit (DSU), Electricity Generation, Supply (including both gas and electricity), Transmission and Distribution, Water and Sewerage Services and Other (which includes Market Operator, Gas Storage and Interconnectors).

2.31 We have grouped licensees by licence type to ensure that our approach to publishing information on potential compliance issues remains within

the scope of the EPAP and relevant legislation. The categories reflect the natural distinctions between the principal licence types that we issue.

2.32 This approach is intended to reduce the risks of identifying individual licensees and, where practicable, we exclude information where publication could seriously or prejudicially affect a licensees interests, for example through reputational damage or a loss of market share. Where a licensee is nevertheless identifiable because of the nature or structure of the market, publication at that level of detail will be considered in line with the applicable statutory powers, duties and restrictions. A separate category is required for the Water and Sewerage Services Licence in order to reflect our duties under Article 259 of the Water and Sewerage Services (Northern Ireland) Order 2006. The licence holder is a government owned monopoly which does not operate in a competitive market and a separate category therefore provides for an appropriate level of transparency and accountability while ensuring that our statutory duties are met.

2.33 We have considered the points raised by respondents requesting a pre-publication verification process. The report reflects a regulatory assessment of compliance activity and therefore is not subject to continual consultation. We do not intend to publish commercially sensitive information and the information we hold will already be known to licensees through routine compliance monitoring and their SoLC submissions. Where a licensee is nevertheless identifiable because of the nature or structure of the market we will engage with those licensees prior to publication of the report.

2.34 We recognise that, for a small number of licensees, identification may be possible even where information is grouped or presented without directly naming the licensee. Where this occurs, we consider it appropriate where the information is needed to provide an accurate and transparent account of compliance activity in that part of the market, and where further aggregation would reduce the usefulness of the report or obscure matters of legitimate consumer and stakeholder interest. This may be the case where the licensee holds a monopoly within the market. In such a circumstance, identification may be unavoidable but ensures consumers have the requisite information to understand compliance activity within all market sectors. This ensures that information provision is expedient while not prejudicially affecting the interests of the licensee. Where the nature or structure of a market means that a regulated entity may still be identifiable, any decision to publish will be taken in accordance with the applicable statutory powers, duties and restrictions, including any restrictions on the disclosure of information.

2.35 We also agree that there should be appropriate safeguards around the accuracy and presentation of published information. The Annual Report will include clear definitions and explanatory narrative to distinguish between potential compliance issues and confirmed breaches. Where appropriate, we will also provide contextual narrative to explain the nature of the information presented, including whether the matter was identified through routine monitoring, audit activity or the annual SoLC process.

2.36 We agree with the consumer representative body that anonymisation should be dependent upon the stage the case/investigation has reached. Anonymity should remain in those instances where early engagement did not lead to a formal enforcement case and anonymity should remain for cases which have been resolved informally, found to be trivial or dismissed due to lack of evidence. This aligns with the procedures and publication requirements as included in our EPAP. Any publication outside that process will be considered separately under the applicable statutory powers, duties and restrictions.

2.37 We agree with the respondent who was not supportive of anonymisation or pseudonymisation where our investigations identify non-compliance or licence breaches. This is in line with what we currently publish in relation to investigations which have entered the relevant stages of our Enforcement Procedure. Cases at our Enforcement Procedure Stage 1 (and above) are published on our website. We also publish information in relation to the outcome of an investigation. We do not, however, publish any information on potential compliance issues on our website nor do we name the companies involved. Where a licensee is nevertheless identifiable because of the nature or structure of the market, publication at that level of detail will be considered in line with the applicable statutory powers, duties and restrictions. This ensures that information provision is expedient while not prejudicially affecting the interests of the licensee.

UR decision

2.38 Routine compliance monitoring information and annual SoLC information will generally be reported on an anonymised, pseudonymised or aggregated basis where applicable. We will group licensees using the following reporting categories: DSU, Electricity Generation, Supply (including both gas and electricity), Transmission and Distribution, Water and Sewerage Services and Other (which includes Market Operator, Gas Storage and Interconnectors).

2.39 This approach will support transparency while ensuring that the information published is fair, proportionate and not misleading. We

recognise that, in a small number of cases, licensees may still be identifiable due to the nature of the market, monopoly position or the limited number of participants in a reporting category. All information is presented fairly, proportionately and with appropriate context.

Question 3

To what extent do you agree with our proposal to include relevant detail by licence type to ensure the data remains of value to the reader.

Stakeholders should outline and explain (where applicable) their rationale for the views expressed and include examples where appropriate.

Stakeholder feedback

2.40 Overall, most respondents support the proposal to include relevant detail by licence type, on the basis that it would make the C&E Annual Report more useful, transparent and meaningful for readers. A recurring theme is that licence-type reporting would help stakeholders identify sector-specific trends, common compliance issues, emerging risks, areas for improvement and potential lessons learned. One respondent did not believe that the proposed report would provide value to the reader.

2.41 One consumer representative body was supportive of our proposal to break down information by licence type. They stated that aggregated figures alone would not let customers compare one company against another and presenting by licence type adds granularity, improves transparency and comparability, and supports benchmarking. They also said it aids the identification of systemic problems without consumers having to raise repeated complaints.

2.42 Several respondents also noted that different licence types may be subject to different obligations, meaning that wholly aggregated reporting may obscure important context or lead to less meaningful conclusions. A consumer body highlighted concerns that reporting solely by licence type will not always provide sufficient transparency and that this should not be a substitute for company-level accountability where publication is justified.

2.43 However, support is generally conditional on appropriate safeguards being applied. A recurring concern is the risk of direct or indirect identification of individual licensees, particularly in the relatively small Northern Ireland market or where a reporting category contains only one or a small number of participants. One respondent provided a suggestion

for the breakdown of the categories to include: electricity suppliers, gas suppliers, network operators, generators, water businesses and other licence categories. Many responses recommend that the UR retain flexibility to aggregate reporting categories further where necessary to avoid any identification risks.

2.44 Another common theme is that licence-type data should be accompanied by explanatory narrative and context. Respondents emphasise that the report should distinguish between issues of different impact and materiality. For example, administrative or procedural issues with limited customer impact should not be compared with matters involving consumer detriment, market impact or systemic failings, without any context. This was because simple counts or comparisons by licence type could be misleading or create inappropriate comparisons between different sectors.

2.45 Several respondents also suggest that reporting by category should not replace company-level accountability where publication is justified, particularly where formal enforcement outcomes have been determined, or regulatory action has been taken. In addition, one response suggests that there may be value in presenting data by condition type across all licence holders where licence conditions apply across multiple reporting categories. One respondent highlighted that this could improve regulatory learning and allow other licensees to review their own controls without identifying a specific licensee.

2.46 In summary, the prevailing view is supportive of reporting by licence type, provided it is proportionate, sufficiently protects anonymity, is supported by clear narrative explanation, and is presented in a way that avoids misleading comparisons while preserving transparency and stakeholder value.

UR response

2.47 We welcome the broad support for including relevant detail by licence type in the C&E Annual Report and the support of both consumer representative bodies. We agree that reporting at this level can make the report more meaningful for consumers, licensees and wider stakeholders by helping to identify sector-specific themes, trends and areas of regulatory focus. This level of reporting, as suggested, could help aid the identification of systemic problems without consumers having to raise repeated complaints.

2.48 We also recognise that different licence types may be subject to different obligations, market roles and regulatory risks, and that wholly aggregated reporting may not always provide sufficient context or value to the reader. While we understand the concern raised by one of the consumer

representative bodies that reporting solely by licence type may not always provide sufficient transparency. Our approach to publishing identifiable information about enforcement cases will follow the EPAP. Any publication outside that process will be considered separately under the applicable statutory powers, duties and restrictions. We consider that the further compliance information contained within the report will collectively provide a fuller picture on compliance behaviour and market outcomes. We do not agree with the respondent who stated that the report would provide no value to the reader. The publication of this report will give consumers, stakeholders and licensees an insight into compliance activity across the market for the first time and then on a recurring basis. It will allow interested stakeholders to see where common themes emerge across licence types and provide a further understanding of market behaviour and trends. It will also support wider performance improvements across the sector by promoting accountability and incentivising licensees to maintain and improve their compliance processes.

2.49 We acknowledge the concerns raised about the risk of direct or indirect identification, particularly where a particular reporting category contains only one licensee or a small number of licensees. As set out in our response to question 2, we intend to group licensees by reporting categories for the purposes of the Annual Report. In some cases, licensees may be identified, or be capable of being identified, because of the nature of the market, their monopoly position or the limited number of participants within a particular reporting category. As previously explained, Where a licensee is nevertheless identifiable because of the nature or structure of the market, publication at that level of detail will be considered in line with the applicable statutory powers, duties and restrictions to ensure that the publication remains relevant to understanding compliance activity in that part of the market.

2.50 We also note the comments that licence-type reporting should be supported by clear explanatory narrative and should not rely on numerical comparisons alone. Compliance issues can vary significantly in their nature, so the Annual Report will therefore present licence-type information in a way that is proportionate and where necessary contextualised to ensure the information is not distorting in any way.

2.51 We note the suggestion that, in some cases, information may be more meaningful if presented by licence condition or obligation type rather than by reporting category. We consider that both approaches may have value, but this depends on the nature of the issue being reported. We will therefore retain flexibility to present information by licence type, reporting category, licence condition, theme or a combination of these,

where this provides the clearest and most useful explanation for consumers and stakeholders.

UR decision

2.52 We will include relevant detail by licence type in the C&E Annual Report. This will add value and support understanding of compliance activity across the sectors we regulate. This information may be presented by licence type, reporting category, licence condition, theme or a combination of these approaches, depending on the nature of the information and the level of detail that is appropriate.

2.53 When doing so, we will ensure that the information is presented to avoid misleading comparisons between different licence types and ensure that the level of detail is proportionate to the nature and significance of the issues reported. As such our proposal is to group licensees using the following reporting categories: DSU, Electricity Generation, Supply (including both gas and electricity), Transmission and Distribution, Water and Sewerage Services and Other (which includes Market Operator, Gas Storage and Interconnectors). Where necessary, we may aggregate information further or provide additional explanatory narrative to ensure the report remains fair, transparent and useful.

Question 4

Should information about cases closed at the Initial Enquiry Stage through an alternative resolution also be published in our Compliance and Enforcement Annual Report?

Please provide the rationale for your position including how it represents the consumer interest.

Stakeholder feedback

2.54 Responses to this question were mixed, although many respondents did support the inclusion of information on cases closed at the Initial Enquiry Stage through alternative resolution in the C&E Annual Report. One consumer representative body highlighted that this is not a new form of publication and recognised that the EPAP already required these cases to be published and included naming the licensee. They highlighted that gathering this information into the Annual Report brings it together for consumers rather than leaving it 'scattered' across separate items. A second consumer representative body was also fully supportive of the inclusion of this information in the Annual Report. They felt that its exclusion would provide an incomplete picture of our compliance and

enforcement activity, and that it was important that the outcomes that have been secured for consumers are clearly explained.

2.55 Supportive responses generally considered that inclusion would improve transparency and demonstrate how matters can be resolved without formal enforcement action, helping consumers and stakeholders understand the range of regulatory tools that are available to address potential compliance issues and strengthen confidence in the regulatory framework. One respondent did suggest that we may want to consider publishing the number of cases closed following the initial enquiry stage, stating that this 'would seemingly align with the approach adopted for the reporting of SoLC findings'.

2.56 Several respondents emphasised that any publication must clearly distinguish alternative resolution from formal enforcement findings and noted that an agreed alternative resolution does not confirm that a licence breach has occurred. It was suggested that the report should be presented clearly to avoid any misunderstanding and ensure that matters resolved through alternative resolution are not interpreted as confirmed instances of non-compliance.

2.57 To reduce any risk of misunderstanding, some respondents then suggested that any publication of alternative resolution information should include appropriate safeguards. These included explaining why alternative resolution was considered appropriate, outlining any consumer benefit or remedial action secured, and clearly stating the status of the case.

2.58 Respondents who did not support inclusion raised concerns about proportionality, reputational impact on licensees and the risk of implying wrongdoing where no formal finding has been made. One of these respondents stated that the Annual Report should only contain information relating to instances where we have identified a breach of licence obligations. This same respondent stated that we should review and consider whether this information is published in other jurisdictions and that doing so would ensure that we are aligned with best regulatory practice. They were concerned that our resources would be spent developing reports that serve no purpose and offer limited benefit to stakeholders. Additionally, a number of respondents indicated that, if information on alternative resolutions is to be included in the Annual Report, it should be anonymised, aggregated, or limited to broad themes or lessons learned, to avoid reputational impact and misunderstanding.

2.59 In summary, there was broad recognition of the value of transparency, but also a clear expectation that any reporting of alternative resolution

cases should be proportionate, carefully contextualised and clearly separated from formal enforcement outcomes.

UR response

2.60 Publication of information on cases closed at the Initial Enquiry Stage ensures that consumers, licensees and stakeholders alike can see the outcome of enforcement activity at this stage. Including this information would provide insight into the application of our enforcement powers and provide a deterrent effect for the relevant market sector. This approach is consistent with our EPAP and with the reporting of similar information in our Annual Report and Accounts.

2.61 We note that some supportive responses went on to suggest the type of information that should be included in the C&E Annual Report; however, some of these suggestions go beyond the information currently provided for under our EPAP which the UR is required to follow. This includes the suggestion of 'appropriate safeguards' (such as the consumer benefit or the remedial action) relating to the publication of alternative resolution information. Publication of this information expands beyond the current EPAP publication requirements and therefore cannot be taken forward at this time.

2.62 Some of the objections to publication appeared to be based on concerns that the proposal would introduce new disclosure requirements, identify licensees, or publish information from the Initial Enquiry Stage where no breach had been established. As per the requirements of our EPAP, where cases are closed following the Initial Enquiry Stage either because there was no case to answer or the breach identified was minor and had been resolved, we do not publish details about the case. However, where the case is closed following the Initial Enquiry Stage because alternative resolution has been agreed, we do not publish information about the case on our website as a news item but include information on this in the UR Annual Report and Accounts. Any such reporting makes clear that alternative resolution at this stage does not represent a formal finding of breach or a formal enforcement determination. This is a proportionate and balanced approach to reporting, cognisant of resource implications and overarching aims of transparency and accountability, whilst complying with the current requirements of the EPAP.

2.63 As per the EPAP, the information to be published will illustrate why alternative resolution was appropriate at the Initial Enquiry Stage and will include the name of the licensee, the potential contravention involved and the alternative resolution agreed, including the amount of any charitable donation, if any, and who it was paid to. The publication of licensee names in these circumstances is therefore not a new proposal for

the C&E Annual Report, as these publication requirements have already been consulted on and agreed through the EPAP. The inclusion of this information in the Annual Report requires safeguards to be in place to ensure that what we publish does not go beyond what our EPAP allows. We will also include information on ongoing investigations where the relevant publication threshold has been met under the EPAP. In those circumstances, the report will make clear that the matter remains ongoing and that no formal finding has been made unless and until the relevant statutory or enforcement process has concluded.

UR decision

2.64 We have decided to include information on cases closed via alternative resolution at the Initial Enquiry Stage in the C&E Annual Report. This will support completeness, as the report is intended to provide an overview of relevant C&E activity during the reporting year. The information included will not go beyond what has already been agreed and consulted on through our EPAP and will align with what has been published previously in the UR Annual Report and Accounts. The inclusion of this information will ensure that we provide a full picture of our compliance and enforcement activity and will show clearly those outcomes that were secured for consumers. This report will serve as a valuable source of information for consumers, licensees and wider stakeholder groups on our compliance and enforcement activity. This helps support market confidence and regulatory oversight, demonstrating the fulfilment of our statutory duties.

2.65 Where alternative resolution information is included, the report will make clear that the case has been resolved without a formal enforcement determination and that no formal finding of breach has been made. The report will also include information on ongoing investigations where the publication threshold set out in the EPAP has been met. Where such information is included, we will make clear that the investigation remains ongoing and that no formal finding has been made unless and until the relevant process has concluded. This approach supports transparency, helps explain the range of regulatory tools available to address potential compliance issues, and provides an important deterrent across the sectors we regulate.

Question 5

Do you have any additional comments on the proposed Annual Report in relation to how the publication of the proposed information is in the interests of consumers?

If you have any additional comments, please provide clear rationale.

Stakeholder feedback

2.66 Overall, respondents were broadly supportive of the proposed annual C&E report and recognised its potential to improve transparency, accountability, and consumer confidence. However, this support was generally qualified by the need for the report to be clear, proportionate and focused on information that is genuinely useful to consumers. One respondent supported our commitment to the continued review and refinement of the reporting framework as experience is gained from future reporting cycles. This will allow the report to remain relevant, proportionate and focused on the information most valuable to consumers and stakeholders.

2.67 Both consumer representative bodies were supportive of the report with one strongly agreeing that our proposed Annual Report is in the consumers' interests. They welcomed our proposal to bring compliance and enforcement information together into a single Annual Report. They stated that the proposed report has the potential to improve public understanding of our C&E activities and provide greater visibility of how companies are monitored and held accountable. The other consumer representative body stated that the report will provide consumers with clearer visibility into how utilities deliver consumer protection. But this came with a caveat that publishing the data is not enough on its own. They highlighted that Northern Ireland ranks as the second-worst-performing UK nation for numeracy skills, and this, combined with affordability pressures that many households face, makes plain language central to the report's success. They highlighted that we should extend the Plain Numbers principles to the whole report, not only the graphics.

2.68 This sentiment was repeated across respondents indicating a preference for an outcomes-focused and accessible report along with the need for Plain English explanations, concise summaries, key consumer-focused themes, trend data, examples of successful remediation, positive compliance indicators and good practice. This would help ensure that the report is not only informative for industry stakeholders, but also meaningful for consumers and representative organisations.

2.69 Most respondents emphasised that the report should not simply catalogue regulatory activity, but should explain the significance of the issues identified, the action taken by the UR and the outcomes achieved for consumers. One respondent did, however, consider if the information published in the Annual Report would offer any tangible benefit to consumers, highlighting that it is not clear who the intended reader of

the report will be and that details on the SoLC are unlikely to be of practical use or interest to stakeholders or consumers and publication, in relation to potential compliance issues, could undermine transparency by providing information on trivial or non-material issues.

2.70 A common theme across the responses was the importance of context. Respondents considered that the report should clearly distinguish between potential compliance issues, audit observations, ongoing investigations, and confirmed licence breaches. Without this distinction, there is a risk that consumers could misinterpret the information presented or assume that all issues are of equal seriousness. Several respondents also highlighted the need to explain whether consumers were affected, the extent of any harm or market impact, whether the matter remains ongoing or has been resolved, and what steps have been taken to prevent recurrence.

2.71 Issues of fairness and proportionality were also frequently raised. Respondents cautioned against publishing information that could imply wrongdoing before a matter has been formally determined, particularly in relation to open investigations or minor issues with no material consumer impact. Several respondents suggested that licensees should have an opportunity to fact-check relevant entries before publication, particularly where they are named or may be identifiable. The risk of indirect identification was noted as particularly relevant in the Northern Ireland market, given the relatively small number of market participants in some licence categories.

2.72 Other points worth noting include the level of concern about the term “potential compliance issues”, the need to avoid giving undue prominence to historic or already resolved matters, and the questions raised about the value of reproducing information in Annexes 1 and 2 where that information is already publicly available elsewhere. Several respondents also suggested that the effectiveness of the reporting framework should be reviewed after the first reporting cycle, with success measured by whether the report improves consumer understanding, strengthens accountability and supports better compliance outcomes.

2.73 One respondent also suggested that the Annual Report should include greater transparency on the UR’s enforcement prioritisation principles. They suggested that a brief explanation would help readers understand that not all potential compliance issues warrant enforcement action, and that factors such as proportionality, consumer benefit and the availability of alternative remedies are considered before enforcement action is pursued.

2.74 Two respondents encouraged the UR to consider allowing licensees to check the factual accuracy of relevant entries and provide brief contextual comments before publication of the final C&E Annual Report. One of these respondents also highlighted that they would welcome the opportunity to review a worked example or draft template of the proposed report before the format is finalised. They stated that this would 'help stakeholders understand the practical implications of the proposed approach, including any potential re-identification risks arising from anonymised information'.

2.75 Two respondents stated that they would 'welcome the opportunity to discuss their consultation response with the UR' and 'would expect the UR to maintain active engagement with licence holders throughout the process'. Another respondent questioned the decision to publish the decision paper and the first Annual Report together stating that 'this does not allow sufficient time for consultation respondents to be fully analysed and assessed' going further to state that it suggests that we have already decided on the detailed content.

UR response

2.76 We welcome the broad recognition that the C&E Annual Report can support the consumer interest by improving transparency, accountability and understanding of our compliance and enforcement activity to protect consumers. We agree that the report should be clear, proportionate and focused on information that helps consumers and stakeholders understand the significance of the issues identified, the action taken by the UR and, where relevant, the outcomes achieved. We also support the view of one respondent that a continuous review / refinement of the reporting framework is necessary to ensure that the report remains relevant, proportionate and focused on the information most valuable to consumers and stakeholders. We agree with the consumer representative body who highlighted that the report will provide clearer visibility into how utilities deliver consumer protection. We are committed to the use of plain language principles to ensure that the information is meaningful for consumers and will inform and empower consumers.

2.77 We disagree with the respondent who does not consider that the information we are proposing to include will provide any tangible benefit to consumers. Publication of this report will provide consumers, stakeholders and licensees with an insight into compliance activity across the market. It will allow licensees the opportunity to see how many potential compliance issues were recorded in their licence type, therefore, affording additional insight into where they perform in relation to their licence type grouping. This will further encourage licensees to improve

their compliance and overall performance, leading to better outcomes for consumers across the sector. We further disagree with this same respondent's comments in relation to the publication of potential compliance issues undermining transparency when publication will have the opposite effect. It will provide greater transparency about C&E activity in the NI market, will be consistent with the publication of information in other jurisdictions and will allow stakeholders and consumers greater insight into the Northern Ireland market.

2.78 As set out in our responses to questions 1 to 4, we will ensure that the Annual Report includes appropriate explanation and context, where necessary. This will include distinguishing between potential compliance issues, audit observations, ongoing investigations, and confirmed breaches. The report will also make clear where matters are ongoing, where no formal finding has been made, and where information is included because the relevant publication threshold under the EPAP has been met.

2.79 We also note the suggestions of including trend data, examples of successful remediation, lessons learned and areas of best practice. While we understand the rationale for these suggestions, we do not intend to take these specific points forward at this time. The first Annual Report will focus on implementing the reporting approach consulted on and agreed through this decision paper. Some of the suggestions would require further development, additional data, or a more established reporting baseline before they could be included in a meaningful and proportionate way. We will however retain these suggestions as we continue to evolve the report through future reporting years. We recognise the need for continual evaluation of the usefulness of the report and its ongoing improvement. We will keep the report content under annual review as part of a continuous review cycle to ensure it continues to meet the overarching aims and needs of consumers prior to publication.

2.80 We recognise that the compliance activity of licensees can be both positive and negative and that best-practice or positive behaviours should be recognised. However, examples of good or best practice may be based on information provided by licensees through compliance pro formas or other compliance monitoring processes. This information may be commercially sensitive, provided in confidence, or may identify the specific licensee. It would not be appropriate to publish the information in a way that could disclose a licensee's internal processes, systems or commercial approach. We will however recognise through relevant narrative within the report the importance and indeed presence of positive compliance activity amongst licensees. We want and expect the licensees we regulate to be innovative, successful, responsive to market changes and, at the same time, to deliver the essential energy and water

services needed by all consumers across Northern Ireland. By adhering to the requirements of their licence, licensees are supported in achieving this aim and are able to deliver effective outcomes for consumers. We take a collaborative approach in our engagement with all our regulated companies and stakeholders, and this approach extends to our compliance monitoring and reporting activities. We believe that working together and ensuring open dialogue on licence and market issues helps ensure the best outcomes for consumers. Compliance with licence requirements is central to that engagement and is a core pillar of consumer protection and market performance and success.

2.81 We note the suggestion of including information on the prioritisation principles but note that it is not appropriate to include such narrative in the first Annual Report. The Annual Report is intended to provide an overview of C&E activity during the reporting year, while the EPAP remains the appropriate document for explaining our enforcement approach and prioritisation principles. As per our EPAP our prioritisation principles are not exhaustive, and other factors can be taken into consideration depending upon the specifics of each individual case.

2.82 In our consultation paper we indicated that this decision paper would be published alongside our first C&E Annual Report. Having considered the relevant feedback to this proposal and in recognition of the time required to compile the report to take account of the final decisions reached, we will publish the first C&E Annual Report after this decision paper (we aim to publish in early December 2026).[4] This will allow respondents sufficient time to consider and understand the decisions as outlined in this paper prior to publication of the first C&E Annual Report. Respondents have suggested that a draft or template of the report format would be welcomed to aid stakeholders' understanding of the practical implications of the proposed approach. We do not consider this necessary for all licensees noting that there is now a period of time between the publication of this decision paper and the publication of the Annual Report, and that our final decisions have been clearly outlined across this decision paper to enable licensees to understand the contents of the report. As noted in paragraph 2.31, a pre-publication verification process is not necessary for all licensees. We do not intend to publish commercially sensitive information. Licensees will already be aware of the information we hold as a result of our routine compliance monitoring and the information provided through their SoLC submissions. Such a process would place an unnecessary administrative burden on both UR and licensees and could cause an undue delay to the publication of the report. Where a licensee is nevertheless identifiable because of the nature or

[4] Subsequent Annual C&E reports will be published in Q3 each year.

structure of the market we will engage with those licensees prior to publication of the report.

2.83 The report will reflect information gathered and held by the UR as part of our compliance monitoring and enforcement processes. In order to ensure consumer, stakeholder and market confidence, it is important that the report is independent of licensees and is not subject to undue influence. It is a regulatory assessment of activity and is not subject to continual consultation. Views from stakeholders have been sought, considered in detail and our resultant decisions have been laid out in this decision paper.

2.84 We agree with the respondent who welcomed us keeping the reporting framework under review. In our role as regulator, we strive for ever better in our processes and publications and continuous review is a key part of that cycle of improvement. We continually review our processes to learn from best practice across the regulated sectors and from across the market. We will review the effectiveness of the reporting framework annually, considering whether it improves consumer understanding, strengthens accountability and supports better compliance outcomes. We will make changes where necessary to ensure the framework remains clear, proportionate and effective. We will consider, for example, feedback received from consumer representative bodies, stakeholder / industry groups, or seek specific feedback through our Consumer Protection trackers.

UR decision

2.85 The C&E Annual Report will be prepared and published in a way that supports the consumer interest by improving transparency, accountability and understanding of our C&E activity.

2.86 We will retain the proposed annexes within the C&E Annual Report, where appropriate, as this will ensure that relevant supporting information is available in one centralised location for consumers, licensees and wider stakeholders. While some of this information may be available elsewhere, including it in the report will improve accessibility and help readers understand the report without having to cross-refer to multiple documents or sources.

2.87 We will consider the scope for developing future reports once the first reporting cycle has been completed and we have sufficient information to assess whether additional content would be useful, proportionate and capable of being presented in a fair and meaningful way. We will continue to review our reporting framework annually to ensure that we are learning from best practice across the regulated sectors and from market developments.

2.88 We will not publish our first C&E Annual Report alongside this decision paper. We have given a period of four weeks to allow consultees to digest the contents of this decision paper prior to publication of the C&E Annual Report.

3. Equality Considerations

3.1 Section 75 of the Northern Ireland Act 1998 places a number of obligations on public authorities concerning the promotion of equality of opportunity and regard to the desirability of promoting good relations between different categories. We aim to promote equality of opportunity between:

a. persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;

b. men and women generally;

c. persons with a disability and persons without; and

d. persons with dependants and persons without.

3.2 The UR must also have regard to the promotion of good relations between persons of different religious belief, political opinion or racial groups. In the development of its policies, the UR also has a statutory duty to have due regard to the needs of vulnerable consumers which may include individuals who are disabled or chronically sick, individuals of pensionable age, individuals with low incomes and individuals residing in rural areas. Some of the above equality categories will therefore overlap with these vulnerable groupings.

3.3 We considered that the proposals set out in our consultation paper would help all consumers and we did not anticipate any negative impacts on any particular consumer group, with regard to the publication of our Annual Report. However, we welcomed any evidence from consultees in relation to the equality impacts of the proposals. The feedback received is summarised below alongside our response.

Question 6

Do you agree that where this document has an impact on the groups listed, those impacts are likely to be positive in relation to equality of opportunity for consumers?

If you do not agree, please provide your rationale and examples where possible.

Stakeholder feedback

3.4 While not all respondents answered this question directly, the majority of those who did, agree that the report is likely to have a positive or neutral

impact on consumers in relation to equality of opportunity. No respondents identified any negative impacts, but several respondents did emphasise the importance of ensuring that the report is accessible and easy to understand. In particular, respondents highlighted the need for the use of Plain English, Plain Numbers and clear presentation, supported by balanced and proportionate information and appropriate contextual explanation.

3.5 Respondents also noted that consumers in vulnerable circumstances may benefit indirectly where increased regulatory scrutiny supports improvements in customer service, complaint handling, accessibility arrangements, and compliance with consumer protection obligations.

3.6 Overall, respondents considered that the extent to which the report promotes equality of opportunity will depend on the clarity of the information presented and the extent to which consumers are able to understand its relevance and significance.

UR response

3.7 We note that no respondents identified any negative equality impacts, and we recognise the feedback that the positive impact of the C&E Annual Report will depend on information being presented clearly, accessibly and with appropriate context.

3.8 In preparing the Annual Report, we will apply Plain Numbers principles and use Plain English wherever possible. We will also provide clear definitions of key terms and appropriate explanatory context to support understanding and ensure the report is accessible to all consumers, including those in vulnerable circumstances.

UR decision

3.9 We have undertaken a Section 75 screening of the original proposals as set out in the consultation paper and reviewed all responses as part of the development of this decision paper. We consider that our C&E Annual Report will help all consumers, and we do not anticipate any negative impact on any groups.

4. Next steps

4.1 Following publication of this decision paper, we will proceed with the implementation of the decisions set out in Sections 2 and 3 of this report. This will include finalising the structure and content of the first C&E Annual Report, before publishing in early December 2026.

4.2 The report will provide an overview of our C&E activity during the 2025 reporting year. In preparing the report, we will ensure that published information is presented clearly, proportionately and with sufficient context to avoid misunderstanding, including where matters are ongoing or where no formal finding has been made.

4.3 We will keep the format and level of detail of the C&E Annual Report under review as the reporting process develops. This review will take place annually as part of a continuous review cycle in advance of publication. We will consider feedback on the first C&E Annual Report, assess whether the format, content and level of detail remain appropriate, and identify any information that could improve consumer / stakeholder understanding of C&E activity. We will consider, for example, feedback received from consumer representative bodies, stakeholder / industry groups, or seek feedback through our Consumer Protection trackers. We will also consider the availability and reliability of data needed to support meaningful year-on-year comparisons. We expect future reports to build on the first publication and to continue supporting transparency, accountability and improved compliance outcomes across the sectors we regulate.

5. Glossary of terms

C&E	Compliance & Enforcement
DSU	Demand Side Unit
EPAP	Enforcement Policy Approach and Procedure
FWP	Forward Work Programme
SoLC	Statement of Licence Compliance
UR	Utility Regulator