CONSUMER PROTECTION PROGRAMME 2024–2029

Mid-term review and consultation

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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

The Utility Regulator's (UR) Consumer Protection Programme 2024–2029 (CPP24) sets out our programme of work to strengthen consumer protection across Northern Ireland's electricity, gas and water sectors. When CPP24 was published, we committed to undertaking a mid-term review during Year 3 to ensure that the programme remains relevant and responsive to consumer needs. This mid-term review assesses progress during the first three years of CPP24 and considers evidence gathered through the programme and wider developments affecting consumers. It sets out our proposed work programme for Years 4 and 5, with a focus on the outcomes we want our work to achieve for consumers. We are seeking views on the proposed projects, particularly which should be prioritised, to inform finalisation of the programme.

AUDIENCE

This document is likely to be of interest to a wide range of stakeholders, including domestic consumers, non-domestic consumers, consumer bodies, advice and protection agencies, business representative organisations, energy suppliers and the wider energy and water industry.

CONSUMER IMPACT

The proposed Years 4 and 5 work programme is intended to strengthen consumer protection for domestic and non-domestic electricity, gas and water consumers. Consultation responses, including which should be prioritised, will inform the finalisation of the programme. Individual projects will be scoped separately, including consideration of their specific consumer impacts where appropriate.

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1. Introduction

1.1 Electricity, gas and water are essential services for households and businesses across Northern Ireland. The Utility Regulator's (UR) consumer protection work aims to ensure that consumers are treated fairly and have the protections they need, particularly where they are at greater risk of harm. This includes understanding the different experiences and needs of consumers and using that evidence to help inform our regulatory work.

1.2 Our Consumer Protection Programme 2024–2029[1] (CPP24) is a key element of our Corporate Strategy[2] and sets out a programme of work to strengthen consumer protection across Northern Ireland's electricity, gas and water sectors. The programme includes projects covering domestic and non-domestic consumers, consumers in vulnerable circumstances and future consumers, reflecting the different needs and experiences of utility consumers. While CPP24 seeks to improve outcomes for all consumers, it places particular emphasis on consumers in vulnerable circumstances, recognising that they may need additional support to access essential services and receive the level of service and support they need.

1.3 It is important that consumer protection also keeps pace with change. Consumers continue to face affordability pressures, while the transition to net zero and changes in technology and service delivery will create both opportunities and new consumer protection challenges. Our role is therefore not only to respond to current issues consumers are experiencing, but also to understand emerging issues and ensure our approach to consumer protection remains appropriate as the sectors evolve.

1.4 CPP24 was therefore designed as a flexible five-year programme that could adapt to emerging consumer issues and changes across the energy and water sectors. Given that new priorities may emerge during the programme period, UR committed to undertaking a mid-term review during Year 3.

1.5 This mid-term review assesses progress during the first three years of CPP24 and sets out our proposed work programme for Years 4 and 5. Our approach is evidence-led, with regulatory intervention considered where there is evidence of consumer harm or a clear need for additional consumer protection. As part of the review, we have placed a stronger

[1] CPP24 Year 1: 1 April 2024 to 31 March 2025; Year 2: 1 April 2025 to 31 March 2026; Year 3: 1 April 2026 to 31 March 2027; Year 4: 1 April 2027 to 31 March 2028; and Year 5: 1 April 2028 to 31 March 2029.
[2] https://www.uregni.gov.uk/files/uregni/documents/2024-04/Corporate%20Strategy%20final%20published.pdf

focus on the outcomes we want our work to achieve for consumers. The proposed work programme sets out the projects that will continue into Years 4 and 5 and identifies potential new areas of work. We are seeking views on these projects and which should be prioritised before finalising the programme.

1.6 Evidence gathered through the programme to date has strengthened our understanding of consumers' experiences and needs in a number of areas and has identified issues that should inform the remainder of CPP24. This evidence and the issues identified are considered further in Section 2 and have helped inform the proposed work programme for Years 4 and 5 set out in Section 3.

1.7 Under CPP24, projects have been developed under three core themes:

1. **Research and Leadership** – Providing evidence-based thought leadership in delivering the consumer protection policy agenda.

2. **Enablement** – Creating the frameworks and environment for domestic and non-domestic consumers to engage in a meaningful way with electricity, gas and water services.

3. **Protection** – Providing appropriate protection for domestic and non-domestic consumers who may need additional support to ensure they avail of the best-in-class electricity, gas and water services in Northern Ireland, both now and in the future.

1.8 Table 1 below shows the 23 projects originally committed to under CPP24.

Table 1: CPP24 Years 1–3 Projects[3]

Ref	Project title
1	Domestic Insight Tracker
2	Non-domestic Insight Tracker
3	Energy Transition and Consumer Issues
4	Debt and Affordability (Outworkings of our lived experience energy debt research completed under the CPP 2021-2024)
5	Private Rented Sector (Research)
6	Energy Literacy (Qualitative Research)
7	Consumer Experience of Smart Meter Roll-out
8	Social Tariff (Evidence Base)
9	Supporting the Just Transition to Net Zero
10	Establish Non-domestic Energy Market Forum
11	Domestic Consumers Supplied by Non-domestic Contracts
12	Farming Sector (Engagement and Research)
13	Improving Energy Literacy
14	Plan for the Implementation of Smart Meters and Systems
15	Best Practice Framework (BPF) – Implementation of a new mandatory Code of Practice (CoP) for Consumers in Vulnerable Circumstances
16	Best Practice Framework – Implementation of a new Customer Care Register (CCR) structure
17	Implementation of Updated Electricity Guaranteed Standards of Service (GSS) and Overall Standards of Performance (OSP)
18	Consumer Energy Charters each Winter
19	Review of the Energy Supplier Codes of Practice
20	Company Vulnerability Strategies
21	Bereavement Support
22	Third Party Intermediaries (TPIs) in the Non-domestic Retail Market
23	Improving Non-domestic Consumer Experience

[3] As outlined in Section 2, an additional project (Project 24) was added during the first three years of CPP24.

1.9 The remainder of this document is structured as follows:

- **Section 2** reviews progress in delivering CPP24 during Years 1–3 and considers the evidence and wider developments that have emerged during this period;
- **Section 3** sets out our proposed work programme and intended consumer outcomes for Years 4 and 5;
- **Section 4** considers the equality implications of the proposed work programme; and
- **Section 5** explains how to respond to this consultation and sets out the next steps.

2. Review of CPP24

2.1 When initially developing CPP24, UR considered whether the objectives of the previous Consumer Protection Programme remained appropriate. Stakeholder feedback supported a programme covering domestic, non-domestic and future consumers and indicated that the existing objectives remained relevant. Stakeholders also highlighted a number of areas for consideration, including Just Transition and the need for the programme to remain sufficiently agile to respond to emerging challenges.

2.2 Taking account of stakeholder feedback and the wider operating environment, three core themes were established for CPP24. These incorporated the aims of the previous Consumer Protection Programme and provided the framework for the projects and workstreams to be delivered through CPP24.

2.3 The three core themes are:

(i) **Research and Leadership** – Providing evidence-based thought leadership in delivering the consumer protection policy agenda.

(ii) **Enablement** – Creating the frameworks and environment for domestic and non-domestic consumers to engage in a meaningful way with electricity, gas and water services.

(iii) **Protection** – Providing appropriate protection for domestic and non-domestic consumers who may need additional support to ensure they avail of the best-in-class electricity, gas and water services in Northern Ireland, both now and in the future.

2.4 There was agreement among stakeholders who responded to the CPP24 consultation that the three themes were appropriate. Following consideration of the consultation responses, UR decided that CPP24 would proceed with the core themes as identified.

2.5 As part of the mid-term review, we have considered whether the three core themes now remain appropriate for the remaining two years of CPP24. Our view is that all three themes remain fit for purpose. The themes continue to provide a broad framework within which we can respond to the range of issues affecting domestic and non-domestic consumers across the electricity, gas and water sectors. They allow for changes in the consumer landscape and emerging issues without limiting the types of consumer protection work that can be taken forward under CPP24.

2.6 Delivery during the first three years of CPP24 has also demonstrated the continued relevance of each theme. Under Research and Leadership,

work including our Consumer Insight Trackers and research around farming and other consumer groups has strengthened the evidence available to understand consumer experiences and identify emerging issues. Enablement has included work to improve energy literacy and support consumers to engage more effectively with utility services. Under Protection, we have strengthened regulatory protections through the new CoP for Consumers in Vulnerable Circumstances, measures to strengthen protections for non-domestic consumers and our work on TPIs.

2.7 The evidence and emerging issues considered later in this section also indicate that these three areas remain relevant for Years 4 and 5. Consumers will continue to benefit from a strong evidence base, support to engage effectively with changing utility markets and appropriate regulatory protections. We therefore propose to retain Research and Leadership, Enablement and Protection as the three core themes for the remainder of CPP24.

1. Do you agree that Research and Leadership, Enablement and Protection remain appropriate as the three core themes for the remainder of CPP24? Please provide any additional information to support your view.

2.8 Table 2 below provides an update on progress against each of the 23 projects originally included in CPP24, as well as the additional project introduced during the programme. This table summarises the key work undertaken during the first three years of CPP24.

Table 2: CPP24 Delivery – Years 1–3

Project Ref	Project Name	Status[4]	Progress to date	Impact
1	Domestic Insight Tracker	Achieved	Domestic Consumer Insight Tracker surveys have been completed annually during the first three years of CPP24. The survey enables us to measure domestic electricity and gas consumer experiences, attitudes and behaviours over time. The survey also enables us to compare experiences of different domestic consumer groups across a range of demographic characteristics.	The survey findings have been used to inform our consumer protection work during CPP24 by identifying areas where regulatory interventions may be needed, for example for consumers living in the private rented sector and the need to improve awareness of supports and protections for that group. Findings are also shared with our stakeholders as an evidence base to inform wider policy discussions.

[4] For the purposes of this table, 'ongoing' means that the project is still underway, including activity continuing from Year 3. 'Achieved' means that we have delivered what we set out to do under CPP24 to date. It does not mean that no further work is planned in Years 4 and 5 in that area.

Project Ref	Project Name	Status[4]	Progress to date	Impact
2	Non-domestic Insight Tracker	Achieved	Non-domestic Consumer Insight Tracker surveys have been completed annually during the first three years of CPP24 and have provided an evidence base on the experiences, attitudes and behaviours of non-domestic consumers. Moving from a biennial to an annual survey has enabled closer monitoring of market developments and consumer issues.	The findings of these surveys have informed a range of CPP24 projects for non-domestic consumers, ensuring that any regulatory interventions are evidence based and responsive to consumer needs.
3	Energy Transition and Consumer Issues	Project removed	Following discussions with the Consumer Council for Northern Ireland (the Consumer Council) on its plans for consumer research on the Energy Transition, we have not progressed this project to avoid duplication.	N/A
4	Debt and Affordability (Outworkings of our lived experience energy debt research completed under the CPP 2021-2024)	Achieved	We established a roundtable working group on debt and affordability with electricity and gas suppliers in June 2024. Workstreams progressed through this group have included: • Development of a framework for effective communications at the debt prevention stage. • A review of supplier debt processes.	The working group facilitates improvement in the suppliers' approach and response to dealing with customers in debt and experiencing affordability-related issues, through a focus on more effective communications and understanding of the customer journey.

Project Ref	Project Name	Status[4]	Progress to date	Impact
			• Development of tailored information for consumers to explain what happens when they get in touch with their supplier to discuss their payment difficulties.	
5	Private Rented Sector (Research)	Ongoing – On track (Year 3 Project)	Qualitative research is currently being completed with domestic electricity and gas consumers who live in the private rented sector (PRS) and with expert organisations who represent these groups.	The research will identify if additional or enhanced consumer protection is required for consumers living in the PRS, in particular for those in vulnerable circumstances.

Project Ref	Project Name	Status[4]	Progress to date	Impact
6	Energy Literacy (Qualitative Research)	Achieved	Energy literacy is the ability to engage confidently with energy companies and make informed decisions that lead to positive outcomes. We completed qualitative research with consumers to help develop our understanding of energy literacy issues. This research will be published in November 2026.	The research findings have been used to inform energy literacy projects to be taken forward in years 4 and 5 of CPP24. The projects are aimed at addressing barriers and points of frustration when consumers deal with their energy company, and improving the information and communications provided to consumers. The research learnings will also be used to inform other areas of work, such as our review of CoPs, our work on energy hardship and affordability and improving awareness of consumer protection measures.

Project Ref	Project Name	Status[4]	Progress to date	Impact
7	Consumer Experience of Smart Meter Roll-out	Achieved	Our research into the smart meter roll-outs in Great Britain (GB) and the Republic of Ireland and the impact of these roll-outs on consumer experience was published in October 2024.	The research findings have shaped the focus and structure of the emerging UR work on consumer protection programme for electricity smart metering. They will help ensure that protections are appropriate and targeted, while informing the functionality, communications and roll-out of electricity smart metering.
8	Social Tariff (Evidence Base)	Achieved	We have developed evidence on various aspects of domestic electricity targeted affordability measures and shared it with the Department for the Economy (DfE) and the Department for Communities (DfC).	This evidence base is available to DfE and DfC to inform their wider policy considerations on consumer support, including through the Energy Strategy and Warm Healthy Homes Strategy.

Project Ref	Project Name	Status[4]	Progress to date	Impact
9	Supporting the Just Transition to Net Zero	Ongoing – On track	Our deliberative research with consumers on the Just Transition was published in April 2026. This provided us with valuable insight into consumers' concerns and expectations around the energy transition to net zero. We also completed an internal benchmarking review of regulatory approaches to the Just Transition across different jurisdictions.	The findings of both our deliberative consumer research and our benchmarking exercise are informing the development of our regulatory work in supporting the just transition to net zero. An internal working group across UR has been established to guide our work to ensure that consumers are protected on the way to net zero and to provide regulatory support to wider government policies to deliver a Just Transition.
10	Establish Non-domestic Energy Market Forum	Achieved	The Non-domestic Energy Market Forum has been established and continues to meet quarterly. This brings together UR and organisations representing non-domestic consumers across Northern Ireland.	The forum has helped strengthen communication between UR and non-domestic stakeholders by providing a regular platform for representatives to raise consumer issues, share the experiences of their members and receive updates on relevant UR work. This engagement

Project Ref	Project Name	Status[4]	Progress to date	Impact
				helps ensure that UR's work is informed by the views and experiences of non-domestic consumers.
11	Domestic Consumers Supplied by Non-domestic Contracts	Ongoing – On track (Year 3 Project)	Work on this Year 3 project has commenced with a Call for Evidence being developed to improve understanding of the experiences of domestic consumers supplied through non-domestic energy contracts. The evidence gathered will help establish the scale and nature of any consumer issues, identify where existing consumer protections may differ from those available under domestic contracts and help inform whether any future regulatory intervention is required.	This work will provide a stronger evidence base to ensure that any consumer protection issues affecting this group can be identified and addressed, including through improved awareness and regulatory changes where required.
12	Farming Sector (Engagement and Research)	Achieved	UR commissioned independent qualitative research to improve understanding of the relationship between the farming sector and utility services in Northern Ireland, including the challenges faced by farmers. Published in November 2026, the research provides valuable	The research has strengthened our understanding of the experiences and needs of farming consumers and provided an evidence base for further engagement with utility

Project Ref	Project Name	Status[4]	Progress to date	Impact
			insight into farmers' experiences, the critical role utilities play in supporting the farming sector and the challenges the sector faces.	companies and other stakeholders. The findings have also helped inform the proposed work programme for Years 4 and 5 of CPP24.
13	Improving Energy Literacy	Ongoing – On track	Energy literacy is the ability of consumers to confidently engage with the energy market to make informed decisions that deliver positive outcomes. To complement our energy literacy research (Project 6), we analysed energy complaint trends, carried out preliminary behavioural science reviews of selected consumer journeys, and engaged directly with the Consumer Protection Advisory Group (CPAG) members on energy issues. This work has strengthened our understanding of where consumers face challenges engaging confidently with the energy market.	We have a better understanding of the energy literacy issues consumers face. This understanding, and the issues it has identified, will be the focus of our energy literacy projects to be delivered in years 4 and 5 of CPP24.

Project Ref	Project Name	Status[4]	Progress to date	Impact
14	Plan for the Implementation of Smart Meters and Systems	Achieved	We have worked closely with our Smart Metering team and DfE to inform the design plan for electricity smart metering. DfE published its high-level design plan for the roll-out of smart electricity meters in April 2026.	One of the principles that will guide the smart meter programme is 'consumers will be at the heart of smart metering', as set out in DfE's Design Plan. UR will ensure this guides its consumer protection framework throughout every stage, including meter design and functionality, installation, communications and ongoing support. UR will review existing consumer protections and, where required, implement new consumer protections relating to smart metering.
15	Best Practice Framework (BPF) – Implementation of a new mandatory Code of Practice (CoP) for Consumers in Vulnerable Circumstances	Achieved	The CoP for Consumers in Vulnerable Circumstances was introduced into electricity, gas and water licences in November 2024, along with a new wider definition of vulnerability.	The implementation of the new Code and wider definition of vulnerability supports better identification, protection and support for consumers in vulnerable circumstances across electricity, gas and water.

Project Ref	Project Name	Status[4]	Progress to date	Impact
			An initial one-off confirmation of compliance with the new Code was completed via an information request. Going forward, monitoring and reporting will be completed through a combination of the annual Statement of Licence Compliance (SoLC) process and the Retail Energy Market Monitoring (REMM) Framework.	
16	Best Practice Framework - Implementation of a new Customer Care Register (CCR) structure	Ongoing	The overarching objective of the CCR project is to create a single utility CCR across electricity, gas and water. During Year 2 of CPP24 we published an information and decision paper on the CCR project. This paper set out the core project deliverables, the actions that are required by industry to facilitate delivery and the overarching design principles to be applied throughout the project. The first phase of this project will be the implementation of a single electricity and gas CCR alongside the water register. Phase 1 of the project commenced during Year 3. This included the establishment of Industry Working Groups who will develop, implement and maintain the new CCR structure.	The implementation of a shared CCR will simplify the process for consumers to register for additional support across electricity, gas and water, helping them access the support they need more easily.

Project Ref	Project Name	Status[4]	Progress to date	Impact
			This is a long-term project that will continue into Years 4 and 5 of CPP24.	
17	Implementation of Updated Electricity Guaranteed Standards of Service (GSS) and Overall Standards of Performance (OSP)	Ongoing	GSS and OSP set out the prescribed levels of service that domestic and non-domestic consumers can expect from the electricity distributor and their electricity supplier. In October 2025 we published a consultation on the review of electricity GSS and OSP. The review involved consumer research with domestic and non-domestic consumers, stakeholder engagement, benchmarking against Northern Ireland's gas GSS regulations and consideration of similar electricity GSS and OSP provisions in GB. This followed on from the consultation in 2023. The 2025 paper consulted on: • The suitability of providing a GSS that would apply during severe weather conditions; • Metering GSS and OSP; and • Inflationary uplifts to all GSS payment amounts.	Once implemented by DfE via the appropriate legislative mechanisms, the updated GSS and OSP regimes will enhance the levels of protection and standards of service offered to consumers in Northern Ireland.

Project Ref	Project Name	Status[4]	Progress to date	Impact
			Decisions on all non-metering GSS and OSP were published in July 2026. Decisions on all metering GSS and OSP are dependent on DfE's approach to amending the primary legislation on metering responsibilities.	
18	Consumer Energy Charters each Winter	Achieved	The Consumer Energy Charters provide enhanced protections for domestic and small business consumers during the winter period. Electricity and gas suppliers sign up to the charter commitments on a voluntary basis. These commitments are in place between 1 November and 31 March each year. The domestic charter has been implemented annually since 2022. In 2024 we also introduced a small business charter which we have continued to implement annually.	The Charters provide additional protections and support for domestic and small business consumers during the winter period, particularly those experiencing or at risk of energy debt or hardship.
19	Review of the Energy Supplier Codes of Practice	Ongoing – On track	Review or development of the following Codes has commenced and proposals for changes are in progress:	These proposals will help ensure that the standards in each Code remain up to date and continue to provide appropriate protection for consumers as the energy market and consumer needs evolve.

Project Ref	Project Name	Status[4]	Progress to date	Impact
			• Marketing CoP for Domestic Consumers and Marketing CoP for Non-Domestic Consumers - The purpose of the Marketing CoPs is to protect electricity and gas consumers from inappropriate and misleading marketing techniques, ensuring that they are able to make informed and reasoned decisions on switching energy supplier. • Payment of Bills CoPs – Domestic review and development of a new Non-domestic Code - The purpose of this CoP is to set out the actions suppliers should take to identify and support consumers experiencing payment difficulties and help them avoid or manage energy debt. • Services for Prepayment Meter Customers CoP - The purpose of this CoP is to ensure that consumers who pay by prepayment meters are adequately protected and not unduly disadvantaged compared to those who pay by standard credit or by direct debit.	

Project Ref	Project Name	Status[4]	Progress to date	Impact
20	Company Vulnerability Strategies	Planned – Commencing in Q4 of Year 3	We will set a requirement for electricity, gas and water companies to develop a vulnerability strategy for their organisation and to report on this strategy to UR. This project will commence in Q4 of Year 3 and will continue into Year 4.	Vulnerability strategies will ensure that consumer protection is given primary consideration at board level and within company decision-making. This will both embed consumer protection within the company culture and provide accountability for actions at a strategic level.
21	Bereavement Support	Ongoing – On track	During Year 3 we completed desktop research into provisions in other regulated sectors and jurisdictions and analysis of policy recommendations from expert bodies. We have also engaged with stakeholders including Marie Curie, Cruse, Advice NI, Compassionate Communities and the Department of Health. Proposals for improved protections based on this evidence will be finalised during Year 3 of CPP24.	This project will identify if there is a requirement for additional protections for consumers who have been recently bereaved and will consult upon any such protections where identified.
22	Third Party Intermediaries (TPIs) in the Non-domestic Retail Market	Achieved	Following consultation, UR published a position paper and proposed licence modifications in May 2026 setting out its decisions to improve transparency and consumer protection in the non-domestic TPI market.	The measures will improve the information available to consumers when engaging with TPIs and strengthen the regulatory framework governing TPI activity. For example, this

Project Ref	Project Name	Status[4]	Progress to date	Impact
				includes a requirement for suppliers to publish Third Party Costs on a customer's Principal Terms and on request in a standardised format. Licence modifications will take effect in January 2027.
23	Improving Non-domestic Consumer Experience	Achieved	Following consultation, UR published a position paper in July 2025 setting out a package of measures to improve the experience of non-domestic consumers in the energy retail market. The associated licence modifications took effect in February 2026, implementing these new consumer protections.	The measures strengthen transparency and support fairer outcomes for small business consumers. For example, suppliers are now required to publish prices for small business consumers on their websites, making it easier for consumers to access and compare tariff information.

Project Ref	Project Name	Status[4]	Progress to date	Impact
24	Small Business Consumer Experience of Debt – Qualitative Research	Achieved	This project was added during CPP24 to respond to evidence of energy affordability pressures facing small business consumers. UR commissioned qualitative research to better understand the lived experiences of small businesses experiencing energy stress or hardship.	Published in October 2026, the findings provide important insight into the challenges faced by these consumers and have strengthened the evidence base for future regulatory work in this area, including the development of a new non-domestic CoP on the Payment of Bills.

Broader Consumer Protection Work

2.9 CPP24 is a key element of UR's consumer protection work and sets out a programme of work to strengthen consumer protection across Northern Ireland's regulated utility sectors. However, CPP24 does not represent the entirety of UR's consumer protection activity. Alongside the programme, UR undertakes wider regulatory work to protect consumers across Northern Ireland's utility sectors. Some of the key areas are outlined below.

2.10 UR sets price controls to ensure regulated companies deliver value for money and reviews tariffs to ensure charges to consumers are necessary and justified. We monitor retail and wholesale markets to safeguard consumers. Compliance and enforcement remain central to our role, ensuring that companies meet their legislative obligations under licence conditions and codes of practice. Where necessary, we take action to address non-compliance and uphold consumer interests.

Consumer Measures and Performance

2.11 UR values the collaborative approach in network price controls that helps to develop the consumer measures and the associated targets. We chair two groups which bring together consumer representatives, government and the relevant utility company to help develop consumer priorities and measures and monitor company performance.

2.12 The Consumer Engagement and Advisory Panel (CEAP) is made up of representatives of the Consumer Council, DfE and NIE Networks. CEAP's role includes agreeing the strategic engagement approach for consumers and stakeholders to inform NIE Networks' work, developing consumer performance measures and targets for NIE Networks, and reviewing performance against these agreed service standards via the RP7 Price Control.

2.13 The Consumer Measures and Satisfaction Group (CM/SAT) is made up of representatives of the Consumer Council, the Department for Infrastructure and NI Water. The group provides a forum for the development of consumer priorities and consumer measures, the monitoring of performance and informing consumer commitments set through the price control.

2.14 We are taking a similar approach to developing appropriate consumer-focused performance measures for the gas distribution networks. During the GD23 price control period, we worked with the gas distribution network operators to explore potential consumer-focused metrics, Key Performance Indicators (KPIs) and targets. We propose to continue this

work through the GD29 price control process, including further engagement through working groups with the network operators and consumer representatives, with a view to implementing appropriate measures as set out in the GD29 price control final determination during the GD29 period.

Stakeholder Engagement

2.15 UR recognises the essential input of a wide range of stakeholders in our work. We engage with consumer representatives and industry through a number of established forums to understand emerging issues and inform our work.

2.16 The Consumer Protection Advisory Group (CPAG) provides advice, guidance and challenge to UR on the needs of domestic consumers, with a particular focus on the needs of consumers in vulnerable circumstances. The CPAG is chaired by the Consumer Council and membership consists of relevant consumer representative bodies and charities.

2.17 The Energy Hardship and Debt Engagement Group (EHDEG) facilitates cross-industry collaboration towards a shared goal of increased protection and support for consumers who are experiencing or at risk of experiencing energy debt or energy hardship. EHDEG members include all domestic electricity and gas suppliers, the Consumer Council and the Chair of CPAG.

2.18 The Non-domestic Energy Market Forum was established during the first three years of CPP24 to provide regular engagement between UR, non-domestic energy suppliers and other relevant stakeholders on issues affecting non-domestic consumers. The forum is now established as an ongoing part of UR's stakeholder engagement and will continue throughout the remainder of CPP24.

2.19 Our engagement also extends beyond Northern Ireland, allowing us to learn from and share approaches with other regulators and consumer protection organisations. We chair the UK Regulators Network (UKRN) Vulnerability Network and participate in the UKRN Cost of Living Working Group, Council of European Energy Regulators (CEER) and UKRN Young Professionals Network. We are also members of the Essential Services Access Network and the Collaboration Network.

Other Consumer Protection Activities

2.20 We review supplier Codes of Practice to ensure they meet the minimum standards we have set. This includes both reviewing Codes for new market entrants and reviewing changes to existing supplier Codes.

2.21 Improving the accessibility of our own communications is another area of focus. In 2025, UR became the first United Kingdom (UK) regulator to partner with Plain Numbers. Through the partnership, we are working to make our communications easier for consumers to understand, recognising that low numeracy can be a barrier for some consumers. We are also using the learning from the partnership to promote good practice across the companies we regulate.

2.22 Fuel Poverty is a key area of work for UR. DfC published the Warm Healthy Homes Strategy 2026-2036 in February 2026 which provides a long-term framework for addressing fuel poverty to ensure that everyone can live in a warm, healthy home. We sit on the Fuel Poverty and Just Transition Project Board (chaired by DfC) and we are a key delivery partner in the Strategy, in particular around the theme "Protect Consumers". This focuses on ensuring affordability, robust protections and quality standards for energy efficiency and heating measures.

Emerging Issues

2.23 CPP24 was designed as a flexible programme to recognise that consumer priorities and the wider environment could change over its five-year period. Since CPP24 was introduced, there have been developments in the energy market, wider economy and consumer landscape.

2.24 The proposed Years 4 and 5 work programme reflects both these wider developments and the continuation of existing CPP24 work, including the ongoing review of our regulatory frameworks and consumer protections.

Economic and affordability context

2.25 CPP24 was initially developed during a period of significant increases in energy prices and wider cost-of-living pressures. While energy prices have fallen from the peaks experienced during the energy crisis, they remain above historic levels and we know that both households and businesses are concerned about recent increases in energy prices and their impact on their budgets.

2.26 Inflation and increases in the wider cost of living have continued to place pressure on household and business finances. At the same time, international energy markets remain exposed to geopolitical uncertainty and global events, which can contribute to volatility in wholesale energy prices.

2.27 Therefore, affordability remains an important issue for both domestic and non-domestic consumers and will continue to inform our consumer protection work during the remainder of CPP24.

Energy transition to net zero

2.28 The transition to net zero aims to ensure that our energy is secure, affordable and clean for us now and for future generations. The transition will require significant change throughout Northern Ireland's energy system, affecting how consumers use and pay for energy. As our energy system evolves, we will need to make decisions that protect and enable energy consumers and support wider government policies to deliver a Just Transition.

Artificial Intelligence

2.29 The use of Artificial Intelligence (AI) has grown significantly since CPP24 was developed and is increasingly being used by organisations to support the delivery of services and interactions with consumers.

2.30 For energy and water consumers, increased use of AI could change how they interact with companies and access information and support. It could provide more efficient and accessible customer service, but it may also create new consumer protection risks. These risks could be greater for consumers in vulnerable circumstances or those who have difficulty accessing or engaging with digital services.

2.31 Other regulators are also considering how existing regulatory frameworks apply to the use of AI. Ofgem has published good practice guidance[5] on the ethical use of AI in the energy sector, including governance, accountability and the assessment and mitigation of risks. The Financial Conduct Authority (FCA) has also set out its approach to AI[6], focused on supporting its safe and responsible use within the existing regulatory framework.

Wider regulatory and strategic developments

2.32 There have also been a number of wider regulatory and strategic developments since CPP24 was published which are relevant to our consumer protection work.

2.33 The European Union (EU) launched its Citizens Energy Package in March 2026. The Package is part of the EU's commitment to deliver affordable energy for all and empower citizens to actively participate in the clean energy transition. The package sets out recommendations aimed at protecting and supporting consumers as they engage in the clean energy transition. We will monitor the implementation of the Citizens Energy Package in the Republic of Ireland, given Northern Ireland's participation

[5] https://www.ofgem.gov.uk/sites/default/files/2026-05/ethical-ai-use-in-the-energy-sector.pdf
[6] https://www.fca.org.uk/firms/innovation/ai-approach

in the Single Electricity Market (SEM), and consider any implications for Northern Ireland consumers. We will further monitor any developments arising from the new Strategic Partnership between the UK and EU.

2.34 DfE's Energy Strategy includes an action to 'develop a Community Energy Policy Framework'. Community Energy is a term used to describe a range of local community owned or run renewable energy schemes and energy efficiency services. We will work with DfE as it develops the policy framework to understand the implications for how we regulate community energy schemes, our role to support and enable them and ensure that consumers participating in community energy schemes are appropriately protected.

Evidence gathered through CPP24

2.35 Research undertaken during the first three years of CPP24 has helped strengthen our understanding of consumers' experiences and identify areas for further consideration during Years 4 and 5. Some of the key findings are outlined below.

2.36 Domestic and Non-domestic Consumer Tracker Surveys - Our domestic and non-domestic Consumer Insight Trackers allow us to monitor consumers' experiences, attitudes and behaviours over time. Recent findings show improving satisfaction and trust in energy suppliers, with 87% of domestic electricity consumers and 86% of domestic gas consumers now reporting that they were satisfied or very satisfied with their supplier. Satisfaction was also high among non-domestic consumers, at 80% for electricity and 77% for gas. The findings also highlight areas where challenges remain, including payment difficulties and sign-ups to customer care registers among domestic consumers and knowledge and engagement with the energy market among non-domestic consumers.

2.37 Smart Metering Consumer Impact Research – In October 2024 we published our research into the impacts on consumers of smart meter roll-outs in GB and the Republic of Ireland. The research provided a number of recommendations to help consumers through the different stages of the smart metering process from pre-installation to ongoing benefits and support. We will use the findings of this research to inform our work developing a package of consumer protections to be delivered as an essential and central part of the smart meter roll-out.

2.38 Farming Research - Our research with farm businesses highlighted challenges with essential electricity and water services, including water reliability and pressure, electricity network capacity and billing. Farmers also reported concerns about response times and communication when

problems arose. The findings have helped identify areas where further engagement with utility companies and other stakeholders may improve the experience of farming consumers.

2.39 Small Business Energy Hardship Research - Our research found that rising energy and wider business costs are placing significant pressure on some small businesses. Businesses reported reducing opening hours and struggling to pay energy bills or accumulating debt. The research also highlighted impacts on business owners' wellbeing and low awareness of available advice and support.

2.40 Three Hands Energy Outside In project - In autumn 2025, UR participated in the Northern Ireland Energy Outside In project delivered by Three Hands. The project brought together representatives from UR, the Consumer Council and industry with people with lived experience of vulnerability and subject matter experts. Sessions explored identification and disclosure, communications and a fair transition. The insights gathered reinforced the importance of accessible communication, understanding the needs of consumers in vulnerable circumstances and continuing our work on energy literacy and the CCR.

2.41 Protecting consumers on the way to net zero: deliberative research on the Just Transition - Our deliberative consumer research on the Just Transition to net zero, published in April 2026, highlighted a number of concerns about what these changes could mean for consumers. Consumers raised concerns about cost, the practicalities of making changes and a lack of clear information about the options available to them. The research also identified concerns around trust and transparency, with some consumers feeling that the transition was being "done to" them and that its benefits were not always clear. Consumers also highlighted the importance of protecting those in vulnerable circumstances and providing independent and accessible information to support informed decisions.

3. Proposed Work Programme (Years 4-5)

3.1 In developing the proposed work programme for Years 4 and 5, we have considered evidence gathered from the first three years of CPP24, the progress we have already made on projects and the implications of the wider developments outlined in Section 2.

3.2 We have also reviewed consumer protection provisions in other regulated sectors and jurisdictions to identify best practice. This has included a review of approaches adopted by other regulators and organisations including Ofgem, Ofwat, the FCA, the Commission for Regulation of Utilities (CRU), Ofcom, Energy UK, the National Audit Office and the Australian Energy Regulator.

3.3 We value the input and opinions of our wide stakeholder base. We have continued to engage with stakeholders throughout CPP24, including consumer and business representative organisations, regulated companies, government departments and other key stakeholders. This has taken place through various forums (such as CPAG and the Non-domestic Energy Market Forum), individual CPP24 projects and wider engagement. The evidence and views gathered through this process have helped us identify ongoing and emerging consumer issues and inform the proposed work programme for Years 4 and 5.

Consumer outcomes

3.4 We have considered both the work we plan to undertake and what we want that work to achieve for consumers. Tables 3 and 4 therefore identify an intended consumer outcome for each project.

3.5 The consumer outcomes describe the intended benefit of the work for consumers, rather than the output of the project itself. For example, the purpose of a project may be to undertake research or review existing arrangements, while the consumer outcome may be consumers who are better informed or appropriately protected.

3.6 The intended outcomes do not predetermine the findings of individual projects or assume that regulatory intervention will always be required. They set out the consumer benefit that the proposed work is intended to support.

3.7 The work programme for Years 4 and 5 includes both continuing and proposed new CPP24 projects. Table 3 sets out the existing projects which we will continue into Years 4 and 5. Table 4 identifies a range of potential

projects for Years 4 and 5. We have highlighted several areas where further work could benefit a range of consumers. Given the projects and workstreams already underway, we would welcome feedback on which new areas should be prioritised.

3.8 In considering the proposed new projects, we have identified a number of areas that we consider should be given particular priority. These are highlighted in **green** in Table 4. Our proposed prioritisation reflects the evidence gathered through CPP24, including the potential for consumer harm and the urgency of the issue. It also reflects where we consider our work has the most potential to make a positive impact and improve outcomes for consumers.

3.9 In determining the final programme for Years 4 and 5, we will also consider the staff and financial resources required to deliver the proposed projects. A significant proportion of our resources is already committed to the work set out in Table 3, as well as the wider consumer protection work and cross-organisational support set out in section 2. This will affect the number and timing of additional projects that can be taken forward.

3.10 The success of individual projects will be monitored by the team responsible for their delivery and communicated through our Forward Work Programme (FWP) reporting. This may include monitoring through the existing Retail Energy Market Monitoring (REMM) framework or, where necessary, developing new metrics to assess whether the project is delivering its intended consumer outcomes. Our annual Consumer Tracker surveys will also provide relevant measures to assess progress, and additional questions can be included where needed to determine the impact of particular projects. We will also use our ongoing engagement with consumer and stakeholder groups, including CPAG, the Non-domestic Energy Market Forum and EHDEG, in order to gather qualitative feedback and report on the progress of CPP24 projects.

3.11 We recognise the importance of keeping consumers and stakeholders informed about the delivery of CPP24 and the outcomes of our work. We will continue to use our existing engagement and reporting arrangements to provide updates and seek feedback as the programme progresses.

Table 3: Continuing Projects for CPP24 Years 4 and 5

Project Name	Theme	Work in Years 4 and 5	Consumer Outcome
Domestic Consumer Insight Tracker	Research and Leadership	The Domestic Consumer Insight Tracker forms part of our wider evidence base in UR alongside our REMM data, consumer metrics and other research projects. It provides us with key insights into the experiences of domestic consumers. This evidence base both informs our consumer protection work and provides an indicator of the impact of our work. We will continue the annual domestic survey in Years 4 and 5.	The needs and experiences of domestic consumers are better understood and reflected in our consumer protection work.
Non-domestic Consumer Insight Tracker	Research and Leadership	The Non-domestic Consumer Insight Tracker provides an important evidence base on the experiences, attitudes and behaviours of non-domestic consumers and allows us to monitor this over time. We will continue the annual survey in Years 4 and 5 to inform our consumer protection work and identify areas where further consideration may be required.	The needs and experiences of non-domestic consumers are better understood and reflected in our consumer protection work.

Project Name	Theme	Work in Years 4 and 5	Consumer Outcome
Supporting the Just Transition to Net Zero	Research and Leadership	The transition to net zero will require significant change throughout Northern Ireland's energy system, impacting all energy consumers, how they use energy and how much they are required to pay. CPP24 set out the need for UR to understand consumer expectations around the Just Transition, what role UR can play, and identify potential new vulnerabilities that might arise due to the energy transition. Within an energy sector that continues to evolve at pace, this project will guide our work to ensure that consumers are protected on the way to net zero and to provide regulatory support to wider government policies to deliver a Just Transition.	Consumers will benefit from consideration of their interests as we give regulatory advice and make decisions to protect consumers on the way to net zero and support wider government policies to deliver a Just Transition.
Improving Energy Literacy	Enablement	We will partner with energy sector organisations to deliver energy literacy projects to remove barriers and frustrations consumers face when engaging with their energy company. This will involve information gathering and working collaboratively on the development and implementation of solutions at various stages of the consumer journey, as follows:	Reducing and removing the barriers that prevent consumers from engaging confidently with the energy market will help them make informed decisions and achieve positive outcomes.

Project Name	Theme	Work in Years 4 and 5	Consumer Outcome
		1. **Bills and Statements** - Introduce clearer billing and annual statement standards (through the review of the CoP for Bills and Statements) with accompanying best practice guidance. 2. **Tariff information** – A review of how tariffs and energy deals are explained, with accompanying best practice guidance. 3. **Moving Home** - A review of consumer communications during the home move process. 4. **Switching supplier** - A review of consumer communications during the switching supplier process. 5. **Consumer protections** - To work in partnership with other energy sector partners to look at improving consumer awareness of consumer protection measures. We will also use our energy literacy learnings to inform the design and roll-out of the electricity smart metering programme and the Codes of Practice reviews to be carried out in CPP24.	

Project Name	Theme	Work in Years 4 and 5	Consumer Outcome
Debt and Affordability	Research and Leadership / Protection	The Energy Hardship and Debt Engagement Group will continue into Years 4 and 5 of CPP24. We propose a continued focus on how best to engage with, support and educate consumers who are experiencing energy hardship. Through this group, we propose to take forward the findings and recommendations of the energy literacy research that will impact on customer debt journeys during Years 4 and 5. We also propose to explore the potential for a standardised approach for suppliers on their assessment of customers' ability to pay.	Consumers experiencing energy hardship will be supported to engage effectively with their supplier and have a better experience when doing so.
Consumer Protections for Smart Metering	Protection / Enablement	We will develop a comprehensive package of consumer protections to be delivered as an essential and central part of the smart meter roll-out.	Consumers are appropriately protected and supported throughout the smart meter roll-out.

Project Name	Theme	Work in Years 4 and 5	Consumer Outcome
Best Practice Framework - Implementation of a new Customer Care Register (CCR) structure	Protection	During Years 4 and 5 we will progress Phase 1 of the CCR project which is to implement a single energy (electricity and gas) CCR alongside the water CCR. The energy CCR will be a two-tiered register with a medical tier (for those reliant on electricity for healthcare needs and those with a terminal illness) and a needs-based tier. Phase 1 will reduce the number of CCRs in Northern Ireland from nine to two.	The implementation of a shared energy CCR makes it easier for consumers in vulnerable circumstances to sign up to CCRs and access the supports they need. It will reduce the burden on consumers of signing up to multiple registers and having to disclose information about their vulnerability and/or repeat their support needs on multiple occasions.
Consumer Energy Charters each Winter	Protection	The Consumer Energy Charters provide additional protections and support for domestic and small business consumers during the winter period between 1 November and 31 March. We will continue working with electricity and gas suppliers to implement the Charters each winter, with a continued focus on enhancing protections for consumers who are in or at risk of energy debt or hardship.	Enhanced protections and support for domestic and small business consumers who are experiencing or at risk of energy debt or hardship during the winter period.

Project Name	Theme	Work in Years 4 and 5	Consumer Outcome
Review of Energy Supplier and Network Company Codes of Practice	Protection	During Years 4 and 5, we will review and develop a number of Energy Supplier and Network Company Codes of Practice to assess whether consumer protections remain appropriate and reflect current best practice. For energy suppliers, this will include: • Review of the CoP on Complaints Handling. • Review of the CoP on Energy Bills and Statements for Domestic Customers. • Review of the CoP on Energy Bills and Statements for Business Customers. • Introduction of a new CoP for the efficient use of electricity and gas. For gas and electricity network companies, this will include reviewing relevant CoPs covering complaints handling, customer service and consumer information. The reviews will assess whether the existing Codes remain fit for purpose and identify any improvements that may be required.	Domestic and non-domestic consumers benefit from access to appropriate protections and clear information when dealing with their energy supplier or network company.

Project Name	Theme	Work in Years 4 and 5	Consumer Outcome
Company Vulnerability Strategies	Protection	We will continue this project into Year 4 to set requirements for electricity, gas and water companies to develop a vulnerability strategy for their organisation and to report on this strategy to UR.	Vulnerability strategies should ensure that consumer protection is given primary consideration at Board level and within company decision-making. They will facilitate the embedding of consumer protection within the company culture and provide accountability for actions at a strategic level.
Bereavement Support	Protection	During Year 4 we will take forward any regulatory changes identified as necessary to strengthen protections for consumers who have been recently bereaved.	This project will ensure that consumers who are vulnerable following a bereavement are adequately supported and protected.

Table 4: Proposed New Projects for CPP24 Years 4 and 5

Project Name	Theme	Purpose	Consumer Outcome
Farming Sector: Research Follow-up	Research and Leadership	Research published during CPP24 has improved understanding of the relationship between the farming sector and utility services in Northern Ireland. This project would take forward the findings and recommendations from the research where relevant and within UR's remit, including through further engagement with utility companies and other stakeholders. We would also consider whether additional quantitative research would provide further insight into the issues identified and support future regulatory work.	Regulatory frameworks and stakeholder engagement better reflect the needs and experiences of Northern Ireland's farming sector, helping to improve consumer outcomes where appropriate.
Targeted Research into Priority Non-domestic Consumer Sectors	Research and Leadership	CPP24 has included research into a number of non-domestic consumer groups and sectors to improve understanding of their experiences and required support. Evidence from the annual Non-domestic Consumer Insight Tracker suggests that some sectors, including hospitality and the charity and voluntary sector, have faced particular challenges with energy costs in recent years. We may also consider improving our understanding of other sectors where energy is a significant operating cost, such as energy-intensive industries. This project would undertake further sector-specific research into priority non-domestic consumer sectors to strengthen the evidence base and inform future consumer protection work.	Consumer protection is informed by a stronger understanding of the needs and experiences of priority non-domestic consumer sectors, enabling targeted and evidence-based regulatory action where required.

Project Name	Theme	Purpose	Consumer Outcome
		Consultation responses will help identify the sector(s) to be prioritised during the remainder of CPP24. Following this consultation, we propose to select a priority sector, scope and commission targeted research and publish the findings during the remainder of CPP24.	
Consumer Archetypes	Research and Leadership	Northern Ireland's energy sector is changing. The rate of change will increase as we transition to net zero, roll out electricity smart meters, electrify our homes, and change how we pay for and use increasingly personalised energy services. A consumer archetype is a representation of a distinct consumer type or group. The development of household consumer archetypes will move away from using an 'average' consumer and provide better understanding of the impacts that changes in the energy system have on different types of consumers. The archetypes can also help explain to consumers how our decisions will impact them. We already use non-domestic archetypes in some areas of our work.	More tailored explanations will help consumers understand how changes to the energy system will impact them, and the archetypes will inform our ongoing consumer protection work.
Backbilling in the Non-domestic Water Market	Protection	A backbill occurs when it has been determined that a non-domestic consumer has not been correctly charged for the water that they have used, resulting in a supplementary or updated bill for the additional water.	Ensures that non-domestic water consumers are appropriately protected from the impacts of backbilling through a regulatory framework that supports fair and proportionate outcomes.

Project Name	Theme	Purpose	Consumer Outcome
		Unlike the energy market, where protections limit the period for which consumers can be backbilled when they are not at fault, no equivalent protections currently exist for non-domestic water consumers in Northern Ireland. This project would review the current arrangements for backbilling to assess whether the existing regulatory framework provides appropriate protection for consumers, including consideration of approaches adopted in other jurisdictions and whether any gaps in consumer protection exist. The review would also set out our findings and determine whether any changes to the regulatory framework should be considered.	
Monitoring the Third Party Intermediary (TPI) Market	Protection / Enablement	Following consultation on TPIs in the energy market, UR committed in its May 2026 position paper to undertake a further review of supplier information to monitor how the TPI market evolves over time. This project would deliver that commitment by gathering updated information from suppliers on TPI activity and business practices, helping to assess the impact of the regulatory changes introduced through CPP24 and identify whether any further intervention may be required.	Consumers can engage with the TPI market with greater confidence and benefit from improved transparency, with emerging consumer issues identified through ongoing monitoring.

Project Name	Theme	Purpose	Consumer Outcome
Review of Consumer Protections for Medium and Large Non-domestic Consumers	Protection / Enablement	Much of the non-domestic consumer protection work delivered during the first three years of CPP24 has focused on small business consumers, reflecting the evidence gathered through research, stakeholder engagement and various consultations. This project would consider whether medium and larger non-domestic consumers are adequately protected under the current regulatory framework and determine whether there is evidence to support extending any existing protections beyond small businesses. Initial work would focus on developing the evidence base before considering whether any further regulatory action is appropriate.	The needs and experiences of medium and large non-domestic consumers are better understood, with any gaps in consumer protection identified and addressed where appropriate.
Outworkings of the Private Rented Sector (PRS) research	Protection	Following on from completion of qualitative research with private renters in Year 3 of CPP24, in Year 4 we will assess the findings and take forward any recommendations for enhanced consumer protection that are supported by the evidence and within UR's remit.	Consumers living in the PRS are adequately protected. They will also be enabled where appropriate to engage more effectively with their energy contracts.
Artificial Intelligence	Protection / Enablement	The use of AI is becoming increasingly commonplace across all sectors and is rapidly evolving. While this presents many opportunities and potential benefits for industry and consumers, there is also potential for harm, in particular for consumers in vulnerable circumstances.	Consumers are appropriately protected where AI is used in customer interactions, particularly consumers in vulnerable circumstances.

Project Name	Theme	Purpose	Consumer Outcome
		The aim of this project is to develop our understanding of how AI is being used in consumer interactions across the energy and water sectors and identify potential consumer harms, particularly for consumers in vulnerable circumstances. This will include desktop research and consumer engagement and consideration of whether good practice guidance or other regulatory action is required.	
End-of-Life	Protection	In its report *Dying in Poverty 2025: The picture in Northern Ireland*, Marie Curie recommended that "The Utility Regulator in Northern Ireland should take account of the specific needs of people living with a terminal illness when setting standards and monitoring supplier practices." The Warm Healthy Homes Strategy also includes an action to 'Explore end-of-life energy needs and challenges and provide appropriate support.' Following on from the project to strengthen protections for consumers who have been recently bereaved in Year 3 of CPP24, we will explore the introduction of additional regulatory protections and supports for households with those at end-of-life. This will include: • Exploring issues experienced by energy consumers at end-of-life. • Identifying best practice.	Households where someone is approaching the end-of-life have access to appropriate protections and support.

Project Name	Theme	Purpose	Consumer Outcome
		• Developing recommendations for improved protections for Northern Ireland. • Introducing improved protections (if required and within UR's remit).	

2. In relation to the proposed new projects for CPP24 Years 4 and 5 set out in Table 4:

    a. Do you agree with the proposed new projects? Please provide reasons for your answer.

    b. Are there any other projects you consider should be included? Please provide reasons for your answer.

    c. Which of the proposed new projects should be prioritised? Please provide reasons for your answer.

    d. In relation to the proposed "Targeted Research into Priority Non-domestic Consumer Sectors" project, which sector or sectors do you consider should be prioritised, and why?

4. Equality considerations

4.1 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 persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without.

4.2 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 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.

4.3 We completed a Section 75 screening prior to consulting on CPP24 in December 2023. We considered that CPP24 would have positive impacts for all consumers and did not anticipate any negative impacts on any groups.

4.4 We have also considered the potential equality impacts of the proposals set out in this mid-term review. The proposed work programme is intended to strengthen consumer protection across a broad range of domestic and non-domestic consumers, including consumers in vulnerable circumstances. We do not currently anticipate that the proposals will have an adverse impact on any of the Section 75 groups.

4.5 We welcome stakeholder views and evidence on any potential equality impacts that we should consider before finalising the programme.

3. Do you consider that the proposals are likely to have a positive impact on equality of opportunity for utility consumers within the Section 75 groups listed above?

4. Do you consider that the proposals need to be refined in any way to meet the equality provisions? If so, why and how? Please provide supporting information and evidence.

5. Responding to this consultation

5.1 In this section we provide information on how to respond to the consultation as well as next steps.

How to Respond

5.2 We welcome stakeholder views on the questions set out in this paper. We also welcome any other comments or evidence that you consider relevant to the mid-term review or the proposed work programme for Years 4 and 5.

5.3 Please provide a response to these proposals by **5pm on 12 January 2027**. Responses to this consultation should be forwarded to:

Colin Magee
Utility Regulator
First Floor, Millennium House
Great Victoria Street
Belfast
BT2 7AQ
Email: colin.magee@uregni.gov.uk

5.4 Alternatively, responses can be submitted via Citizen Space and can be accessed via www.consultations.nidirect.gov.uk.

5.5 Please be aware that your response to this consultation may be made public by the Utility Regulator.

5.6 Where consultation responses are published, the Utility Regulator will take appropriate steps to remove personal data that is not necessary for publication. Personal data will be handled in accordance with applicable data protection legislation, the Utility Regulator's privacy notice and its retention and disposal arrangements.

5.7 You may ask us to keep all or part of your response confidential. Please state this clearly in your response and explain why. If you wish the Utility Regulator to keep only part of your response confidential, please mark the parts that you would like to be kept confidential and again, explain why. Please note that we may contact you to discuss your wishes.

5.8 The Utility Regulator will take your position regarding the confidentiality of your response, either in whole or in part, into consideration, but cannot guarantee that information identified as confidential will not be published or disclosed. We will consider any confidentiality request on its merits and in accordance with our legal obligations including those arising under the Freedom of Information Act 2000, the Environmental Information

Regulations 2004, the Data Protection Act 2018, or where otherwise required by law.

5.9 Copies of all documents can be made available in large print, Braille, audio cassette and a variety of relevant minority languages if required.

Next Steps

5.10 Following the close of the consultation, we will consider all responses received and use this feedback, alongside UR's wider priorities and available resources, to finalise the work programme for Years 4 and 5. We plan to publish our decisions and final work programme in early-2027.

Annex 1

Overall list of consultation questions

1. Do you agree that Research and Leadership, Enablement and Protection remain appropriate as the three core themes for the remainder of CPP24? Please provide any additional information to support your view.
2. In relation to the proposed new projects for CPP24 Years 4 and 5 set out in Table 4:
    a. Do you agree with the proposed new projects? Please provide reasons for your answer.
    b. Are there any other projects you consider should be included? Please provide reasons for your answer.
    c. Which of the proposed new projects should be prioritised? Please provide reasons for your answer.
    d. In relation to the proposed "Targeted Research into Priority Non-domestic Consumer Sectors" project, which sector or sectors do you consider should be prioritised, and why?
3. Do you consider that the proposals are likely to have a positive impact on equality of opportunity for utility consumers within the Section 75 groups listed above?
4. Do you consider that the proposals need to be refined in any way to meet the equality provisions? If so, why and how? Please provide supporting information and evidence.

Annex 2

Combined list of proposed projects for CPP24 Years 4-5

Project Name	Theme(s)	Type
Domestic Consumer Insight Tracker	Research and Leadership	Years 1–3 commitment complete – continue in Years 4 & 5
Non-domestic Consumer Insight Tracker	Research and Leadership	Years 1–3 commitment complete – continue in Years 4 & 5
Debt and Affordability	Research and Leadership / Protection	Years 1–3 commitment complete – continue in Years 4 & 5
Supporting the Just Transition to Net Zero	Research and Leadership	Ongoing (Continue in Years 4 & 5)
Improving Energy Literacy	Enablement	Ongoing (Continue in Years 4 & 5)
Consumer Protections for Smart Metering	Protection / Enablement	Ongoing (Continue in Years 4 & 5)
Best Practice Framework - Implementation of a new Customer Care Register (CCR) structure	Protection	Ongoing (Continue in Years 4 & 5)
Consumer Energy Charters each Winter	Protection	Years 1–3 commitment complete – continue in Years 4 & 5
Review of Energy Supplier and Network Company Codes of Practice	Protection	Ongoing (Continue in Years 4 & 5)

Project Name	Theme(s)	Type
Company Vulnerability Strategies	Protection	Planned – Commencing in Q4 (Continue in Years 4 & 5)
Bereavement Support	Protection	Ongoing (Continue in Years 4 & 5)
Farming Sector: Research Follow-up	Research and Leadership	Proposed Years 4–5 project
Targeted Research into Priority Non-domestic Consumer Sectors	Research and Leadership	Proposed Years 4–5 project
Consumer Archetypes	Research and Leadership	Proposed Years 4–5 project
Backbilling in the Non-domestic Water Market	Protection	Proposed Years 4–5 project
Monitoring the Third Party Intermediary (TPI) Market	Protection / Enablement	Proposed Years 4–5 project
Review of Consumer Protections for Medium and Large Non-domestic Consumers	Protection / Enablement	Proposed Years 4–5 project
Outworkings of the Private Rented Sector (PRS) research	Protection	Proposed Years 4–5 project
Artificial Intelligence	Protection / Enablement	Proposed Years 4–5 project
End-of-Life	Protection	Proposed Years 4–5 project

Annex 3

Abbreviations

Abbreviation	Full term
AI	Artificial Intelligence
BPF	Best Practice Framework
CCR	Customer Care Register
CEAP	Consumer Engagement and Advisory Panel
CM/SAT	Consumer Measures and Satisfaction Group
CoP	Code of Practice
CPAG	Consumer Protection Advisory Group
CPP24	Consumer Protection Programme 2024–2029
CRU	Commission for Regulation of Utilities
DfC	Department for Communities
DfE	Department for the Economy
EHDEG	Energy Hardship and Debt Engagement Group
EU	European Union
FCA	Financial Conduct Authority
GSS	Guaranteed Standards of Service
KPI	Key Performance Indicator
OSP	Overall Standards of Performance
PRS	Private Rented Sector
REMM	Retail Energy Market Monitoring
SEM	Single Electricity Market
SoLC	Statement of Licence Compliance
TPI	Third Party Intermediary
UK	United Kingdom
UKRN	UK Regulators Network
UR	Utility Regulator