From: Emma Miller

Sent: 04 March 2016 14:46 **To:** Cantley, Barbara

Cc: Eleanor McEvoy; Anne McEvoy

Subject: Reponse to consultation on Proposed Modifications to Gas and Electricity Licences 5

January 2016

Dear Barbara,

Budget Energy welcomes the opportunity to provide responses to the amendments proposed in the "Consultation on Proposed Modifications to Gas and Electricity Licences 5 January 2016" and responds as follows:

Amendment: Condition 34 (5): The Licensee shall not prevent the customer from purchasing their electricity in advance through a prepayment meter.

Comment for Consultation:

BE understands the importance of customers being able to purchase electricity in advance and does not disable meters. As far as we are aware BE is the only supplier that currently does not prevent the customer from vending, we are in support of the amendment.

Amendment: Condition 34 (3)(g) ensure that any calibration of the prepayment meter to recover outstanding charges due from any Customer does not operate so as to recover more than 40% (except where the Customer has in writing requested for a higher percentage to apply) from each amount that is purchased by the Customer in any single transaction (and thereby transferred to the token, key or card by which the prepayment meter is operated), as payment of or towards the outstanding charges.

Comments for consultation

Budget Energy is very supportive of the changes proposed, however it would be our preference to be able to offer the indebted prepayment meter customer a choice of paying the full debt through "normal debt recovery" or recovery through the prepayment meter, (we note your comments at 3.2.5 of the consultation in relation to administration costs). Budget Energy believes this option could prove more manageable and could be beneficial to both customer and supplier with the possible avoidance of further debt recovery costs. We would be grateful for your thoughts?

Amendment: Condition 38 (13): Where a domestic consumer terminates the Contract in accordance with its provisions, the Licensee shall:

- (a) send a final bill to the domestic consumer within six weeks of the Licensee ceasing to provide a supply of electricity to the domestic consumer.; and
- (b) use best endeavours to refund any outstanding credit to the domestic consumer within six weeks of the Licensee ceasing to provide a supply of electricity to the domestic consumer via an appropriate mechanism.

Comments for Consultation:

BE agrees with the proposal of refunding any outstanding credit to closing accounts and dormant accounts. Budget Energy however would like to raise concerns regarding the proposed six week time limit in relation to using best endeavours to refund.

Amendment: Modification to Condition 27: "...at least 28 but no more than 42 days..."

Comments for Consultation:

Budget Energy supports the objective of making the energy market easy for customers and therefore supports the UR proposals.

Amendment: Condition 35: Preparation, Revision Of and Compliance with Codes of Practice (extract) The Licensee shall comply with the Code of Practice minimum standards on Payment of Bills, Code of Practice minimum standards on Provision of Services for persons who are of Pensionable Age or Disabled or Chronically Sick, Code of Practice minimum standards on Complaints Handling Procedure, Code of Practice minimum standards on Services for Prepayment Customers and Code of Practice minimum standards on the efficient use of electricity, as amended or replaced from time to time.

Comments for Consultation:

Budget Energy is committed to open communication, transparency and best practice. We do not have any comments to add with regards to the modification proposal.

Removal of irrelevancies in Condition 40, amended to:

This Condition shall apply, from the date of the direction, where the Authority has directed that it shall apply to the Licensee. This Condition applies to the selling methods and marketing activities of the Licensee in respect of the supply or proposed supply of electricity.

The Licensee shall (and shall procure that its agents or sub-contractors shall) comply with the Marketing Code of Practice for Domestic Customers and/or the Marketing Code of Practice for Business Customers.

Comments for Consultation:

Budget Energy support the proposals in the consultation as in our view they will improve customers' perception of the industry and trust in suppliers and their agents.

Kind Regards
Emma Miller
Head of Legal & Compliance

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