



Commissioner for **Older People**  
for Northern Ireland

Meadhbh Patterson  
The Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6ED

3 December 2018

Dear Meadhbh,

**RE: Consumer Protection Strategy and Proposed New Consumer Protection Programme**

I am writing to you on behalf of the Commissioner for Older People for Northern Ireland in relation to the proposals outlined in the Consumer Protection Strategy and the proposed New Consumer Protection Programme. The role of the Commissioner is to promote awareness of issues relating to older people and to be an authoritative champion for them. The Commissioner's office has reviewed the proposals outlined in the consultation document and welcomes the opportunity to respond to them.

The Commissioner responded to a previous consultation on the Utility Regulator's Consumer Protection Strategy and at the time agreed with the focus on affordability, equal access, empowerment and leadership.

The Commissioner was pleased to speak at the Utility Regulator's Consumer Summit in April 2018, which was held to inform the review of the Consumer Protection Strategy.

Although the Commissioner has reviewed the full consultation, this response is confined to those areas of most relevance to the work of the Commissioner.

The Commissioner welcomes the commitment of the Utility Regulator to build on and enhance levels of protection for domestic consumers. This is particularly important in relation to older people. Northern Ireland has an increasing older population, which in turn means more consumption of energy and gas within that population. As the consultation makes clear, the concept of who is a 'vulnerable' customer is fluid, but older customers can face particular challenges. These include increased risk of fuel poverty due to lower incomes, higher fuel prices and greater use of oil, electricity and solid fuel for heating.

Furthermore, as older people are proportionately less likely to have Internet access, price comparison can be more difficult. The Commissioner notes that helpline numbers are printed on bills, thanks to the Utility Regulators' Code of Practice on billing.

## Priority projects

The Commissioner notes that the review of energy supplier customer care registers is an outstanding project, but welcomes the fact that it will be taken forward in the new delivery plan. Greater promotion of critical and customer care registers would help to ensure that those older people who would benefit from inclusion are aware of it. It would also be useful for those older people placed on the critical care and customer care register to receive a visit from the utility supplier on a mandatory basis. This would ensure older people are fully aware of what being on the register means and how to contact the supplier in the case of a major incident or significant supply issue.

## Projects not currently prioritised

The Commissioner is concerned that *Review equality of access for consumers who have no access to a bank account and or no internet access* is listed as a CPP project not currently prioritised during Years 1-3. As older people are less likely to have access to the internet it is essential that they are provided with the same level of access to the energy market as others. As the consultation states: "This lack of access has the potential to act as a significant barrier to full engagement with the retail market for Northern Ireland". Therefore, the Commissioner would wish to see this project prioritised to ensure that older people are not in any way disadvantaged.

If you would like to discuss any of these points, please contact the Policy Team via:

Emer Boyle  
Head of Legal & Policy Advice  
COPNI  
Equality House  
Shaftesbury Square  
Belfast BT2 7DP

Or by email to [emer.boyle@copni.org](mailto:emer.boyle@copni.org).

Yours sincerely,



Emer Boyle  
Head of Legal and Policy Advice  
Commissioner for Older People for Northern Ireland

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