



**Response by Energia to Utility Regulator,  
Consultation**

***Implementation of a New Supplier Code of Practice on  
Energy Bills and Statements***

**28<sup>th</sup> April 2017**

## **1. Introduction**

Energia welcomes the opportunity to respond to the Utility Regulator's (UR) consultation on the Implementation of a New Supplier Code of Practice on Energy Bills and Statements. Energia invest a large amount of time and effort into ensuring that this aspect of our business delivers the best customer experience possible. Our bills have evolved over time based on customer, in house and consultant feedback to its present incarnation. Furthermore, Energia's experience would indicate that our customers are largely content with our approach to billing and ongoing interaction and review with customer focus groups can ensure we continue to satisfy customers' needs and preferences in respect of their bills. Energia acknowledges the level of engagement that the UR has undertaken during the consultation process and welcomes the changes made to the proposed Code of Practice based on stakeholder feedback.

Notwithstanding the above we have some clarifications and suggested rewordings based on the red-lined version of the Code of Practice which is outlined below.

## **2. Clarifications**

**1.3.1 When a customer receives a bill or statement it must be obvious to them if action is required, for example: if an outstanding amount is to be paid (detailing of how much to be paid, and the date of payment); if no action is required, a statement to this effect.**

**No action includes the following circumstances:**

- **the customer has a direct debit that covers the full amount of the bill for each billing period and no adjustment is required – in this case the bill or statement is for information only, giving the amount owed and the date on which it will be collected from the customer's account; or**
- **the communication is an annual statement for a prepayment customer.**

The introduction of text on a bill that states no action required, has the potential to cause confusion for customers and may be open to certain interpretations by the customer. While elements of the Direct Debit (DD) arrangement require little input from the customer they must maintain a sufficient balance in their account and ensure that the Direct Debit continues unhindered. The bill sent out is a request for payment that is fulfilled by an automated process. From the suppliers perspective there is an action required which is to pay the bill, this just happens to be largely automated. The customer has a responsibility to ensure that the DD continues to go through. If for a reason the customer's DD fails there will be an action for them to carry out.

In our extensive engagement with customers confusion over sending a bill to a DD customer is not something that has come to the fore. Conversely confusion arising from including a line on no action required on a bill may cause issues. Particularly,

since it is a departure from the current approach. Furthermore, the change will have to be accommodated on an already detailed bill and there will be a certain cost to implement the change.

**2.4.1 The supplier will use all reasonable endeavours to take an actual meter reading for each metered customer on at least an annual basis.**

The wording here implies that suppliers are involved in taking meter reads. Suggested change of text to:

| *'The supplier will use all reasonable endeavours to ~~obtain~~take an actual meter reading for each metered customer on at least an annual basis'*

**2.4.5 If the customer receives a bill or statement showing an estimated meter reading it may provide the supplier with a customer meter reading. The supplier must accept this customer meter reading and provide an updated bill or statement reflecting this reading (if requested).**

The wording of the above clause would seem to imply that a supplier must accept a meter read provided by the customer even if it is significantly out of sync with the customer's estimated annual consumption. This may be open to abuse from customers who obstruct access to a meter and wilfully submit false readings. We would suggest a removal or a rewording of this clause to ensure that suppliers are able to refute suspected false reads.