

Meadhbh Patterson
Utility Regulator
Queen's House
14 Queen Street
Belfast
BT1 6ED

firmus energy
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22 September 2017

Dear Meadhbh,

Re: Care Register Review: Special Provisions for Vulnerable Customers

Firmus energy welcomes the progress made to date on the Utility Regulator's Consumer Protection Strategy project.

Firmus energy notes that this review publication relates to water and electricity networks, but that learnings will be used to inform a future review of the gas network companies and supply companies' care registers. A phased approach is welcome, given the substantial differences the electricity and water networks have with gas networks and supply companies.

Firmus energy has an excellent customer service record across its bundled distribution and supply business. As an organisation firmus energy is particularly committed to ensuring that the most vulnerable customers have access to all available firmus energy assistance services.

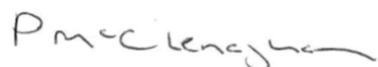
The two stage approach proposed in this consultation provides the opportunity for natural gas companies to take lessons from the good practice examples highlighted as the electricity and water networks progress this project stage. However, the gas distribution and supply companies must be provided equal scope to develop methods which best suit their customers.

For example, the consultation proposes that the gas and electricity network companies deliver a joint programme of promotion for their registers. As the geography of the gas network areas differs from that of electricity and water it is likely that gas networks will require their own bespoke scheme. This would reduce the risk of creating confusion for consumers living in areas not currently served by natural gas distribution companies.

In addition, in order to best serve the needs of customers, gas distribution and supply companies must be provided the scope to fully consider data protection and data sharing issues, in consultation with the Information Commissioner's Office, irrespective of decisions taken by electricity and water companies.

Firmus energy will continue to work to support the long term objectives set out in the Consumer Protection Strategy and look forward to continued engagement with the Utility Regulator to progress this important project.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "Peter McClenaghan".

Peter McClenaghan
Regulatory Affairs Manager