

**12<sup>th</sup> June 2015**

Sinead Dynan  
Gas Branch  
The Utility Regulator  
14 Queens Street  
Belfast  
BT1 6ER

Dear Sinead,

Thank you for the opportunity to respond to the Consultation on the Utility Regulator Consumer Protection Strategy 2015/16 – 2019/20.

Firmus energy supports the implementation of the Consumer Protection Strategy (CPS) that the Utility Regulator (UR) has proposed as a method of protecting the long term interests of businesses and domestic consumers.

#### **OBJECTIVE 1 FOCUS ON AFFORDABILITY**

##### **Development of a Billing Code of Practice, improving communications and helping consumers in crisis**

Firmus energy has an approved interim Code of Practice on Payment of Bills in place. This outlines the arrangements to assist consumers in financial difficulty repay existing debts, whilst ensuring their gas supply remains connected. Firmus energy is committed to helping customers in crisis and intends to finalise this Code of Practice upon completion of the UR's April 2014 Consultation on Minimum Guidelines for Energy Supplier Codes of Practice.

As part of the CPS, the UR has stated its intention to ensure that billing and statements are transparent and easy to understand. FE supports this objective and will work with the UR to ensure that all billing information included within a statement or bill has tangible value to customers.

##### **Implementing a Code of Practice on Energy Theft**

Firmus energy is resolutely determined to mitigate circumstances of energy theft in Northern Ireland. Gas theft, and meter tampering in particular, presents a severe health and safety risk, not only to those who participate in this activity, but also residents living in the surrounding area.

Firmus energy fully supports the implementation of a cross-utility Energy Theft Code of Practice to ensure that the health and safety risks to consumers in Northern Ireland are minimised.

Full stakeholder engagement at industry level, including at the Gas Market Opening Group and The Gas Supplier Forum would ensure universal support for the implementation of a robust Energy Theft Code of Practice.

## **OBJECTIVE 2 EQUAL ACCESS TO UTILITY SERVICES**

### **Ensuring Customer Care Registers are up-to-date and fit for purpose and have equal access for all customers for all services**

Firmus energy is proud of its customer service record and it is particularly committed to ensuring that the most vulnerable customers have access to all available firmus energy assistance services and will work with the UR to further improve customer care registers for vulnerable customers in Northern Ireland.

At present firmus energy has approximately 2,000 vulnerable customers on its firmuscare register. With 42% of households in Northern Ireland currently experiencing fuel poverty, it is important that the UR, Department of Energy Trade and Investment (DETI), Department for Social Development (DSD), The Consumer Council Northern Ireland (CCNI) and all energy suppliers work collectively to address the issue.

The continuation of Government grants for vulnerable customers remains a priority issue. The Northern Ireland Sustainable Energy Programme (NISEP) and the Boiler Replacement Scheme are fundamental programmes that assist those in most need and the continuation of these grant schemes would help the UR fulfil its Equal Access to Utility Services Objective.

## **OBJECTIVE 3 EMPOWERMENT THROUGH EDUCATION, TRANSPARENCY & RESPONSIBILITY**

### **Work with utilities in the development of Guaranteed Standards of Service (GSS) and update/review existing policies**

Firmus energy routinely engages with the UR regarding GSS, and submitted its results for 2014 in March 2015. Firmus energy endeavours to provide an unsurpassed level of service to its customers and therefore supports any improvements that can be made in terms of service standards.

Firmus energy will work with the UR to ensure that any GSS changes provide tangible benefits for customers.

## **OBJECTIVE 4 PROVIDING LEADERSHIP THROUGH BEST PRACTICE REGULATION**

### **Working with partner organisations to research areas which will ensure policy making is evidenced based**


Firmus energy will continue to support evidence based policy making in order to best serve customers. UR research that evidences the specific challenges for Northern Ireland consumers and challenges for the Northern Ireland utilities markets is of particular importance given the significant differences that exist between the energy sectors of Northern Ireland and Great Britain. This is evident, for example, in terms of geographical make-up, gas network maturity, socio-economic conditions, demographics and the prevalence of fuel poverty.

## **CONCLUSION**

Firmus energy will work to support the long term objectives set out in the Consumer Protection Strategy. The protection of vulnerable customers should remain the highest priority and this can be achieved by the UR lobbying for the extension of current grant schemes available to tackle fuel poverty and develop the gas network. Firmus energy also highlights the implementation of a Code of Practice on Cross-Utility Energy Theft, as a critical area that should be addressed as soon as possible.

Firmus energy will continue to engage with the Utility Regulator on all the issues raised as part of this consultation.

Yours sincerely,



Peter McClenaghan  
**Regulatory Affairs Manager**