

*Our ref: SE/ds160109*

16<sup>th</sup> June 2009

Eimear Smyth  
Gas Supply and Distribution Division  
The Utility Regulator  
Queen's House  
10-14 Queen's Street  
Belfast  
BT1 6ER

### **Consultation on Prepayment Gas Meters in Northern Ireland**

Dear Eimear

Thank you for the opportunity to provide comment in respect of the Consultation on Prepayment Gas Meters in Northern Ireland. This response is provided on behalf of Phoenix Supply Ltd.

Phoenix Supply agrees that the current cap on the percentage of PAYG meters within the Phoenix Natural Gas Ltd and Firmus Energy conveyance licences should be removed. We believe that, fundamentally, consumers should be able to choose the Pay-As-You-Go payment method if they so wish and the current cap potentially restricts the ability of customers to choose this payment method.

Phoenix Supply currently charge customers who are repaying debt via a Quantum meter the same tariff as PAYG customers who are not repaying debt, although we do note that the consultation paper highlights that Firmus Energy charge PAYG customers who are repaying debt an inflated tariff (some 25%) in order to recover the outstanding debt. Phoenix Supply does not envisage circumstances where it would be necessary or desirable to charge customers repaying debt a differential tariff from other PAYG customers.

Should you wish to discuss any aspect of our response in further detail please do not hesitate to contact me.

Yours sincerely



Stephen English  
Gas Trading Manager