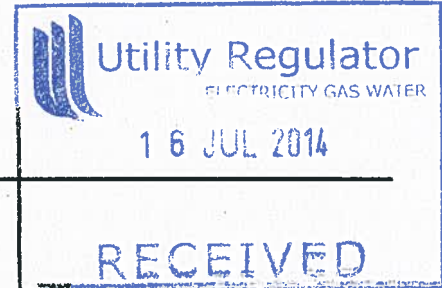


L3st 07/14

HousingExecutive
HOME ENERGY CONSERVATION AUTHORITY

Energy Conservation Unit
Northern Ireland Housing Executive
Housing Centre
2 Adelaide Street
Belfast
BT2 8PB
Phone 02890 318525

Sinead Dynan
The Utility Regulator
Queen's House
14 Queen Street
Belfast
BT1 6ED



10 July 2014

Dear Sinead,

Utility Regulator - Implementation of Energy Supplier Codes of Practice Consultation

Please find enclosed the Housing Executives response to the above consultation.

Yours sincerely

Esther Christie

Esther Christie
Ass. Director Strategic Planning & Research

Enc

NIHE's Response to NIAUR's Pre-consultation on the implementation of Energy Supplier Codes of Practice.

- Q1.** Do respondents agree that customers and suppliers will benefit from a consistent approach to interpretation of the licence conditions? *Yes.*
- Q2.** Do respondents believe that the minimum standards guidance for Codes of Practice is the right approach? *Yes. Please provide supporting information and evidence for your response. The minimum standards guidance for CoP will allow suppliers to focus on providing the best possible service to customers. It helps address poor service and raise the quality of service provided.*
- Q3.** Do respondents agree that where this consultation has an impact on the groups listed, those impacts are likely to be positive in relation to equality of opportunity for energy consumers? *Yes*
- Q4.** Do respondents consider that the proposals need to be refined in any way to meet the equality provisions? *No.* If so, why and how? Please provide supporting information and evidence.
- Q5.** Do respondents agree that the effective monitoring of Codes of Practice is essential? *Yes it generates a more real and accountable commitment on energy suppliers to raise standards of practice and provide benefits to consumers.* Are there any additional areas that should be covered in relation to monitoring, reporting and compliance? *No.*
- Q6** Respondents are asked their opinion on the proposed banding for Indicators 11 and 12, Customer Debt. Some price controlled suppliers already collect and submit information at this level of detail. Respondents are asked if it is appropriate for non-price controlled suppliers to also provide information at this level of detail. We would ask respondents to provide supporting information and alternative suggestions. *Without this there is little incentive for action to be taken by non-price controlled suppliers.*
- Q7.** Respondents are asked their opinion on what monitoring information should be published. We would ask respondents to provide supporting information on their proposal and be mindful of customer transparency as part of their response. *We agree that all statistical data highlighted in the consultation will show if suppliers are complying with the codes and if progress or lack of it is being made.*
- Q8.** Respondents are asked to provide information in relation to changes in practice which may be required. In particular we will take into consideration appropriate evidence in relation to costs and benefits. It will be most beneficial if responses regarding changes in practices and associated costs and benefits first state the individual Code and particular requirement in question, secondly set out why the change in practice is required, and thirdly set out any evidence regarding costs and benefits linked to the change in practice. *No changes in practice identified.*
- Q9.** Do respondents think that the publishing requirements outlined cover all relevant areas? *Yes.* Are there any further comments that respondents have with relation to publishing Codes of Practice? *No.*
- Q10.** Do respondents think that the section of the Code in Annex 1 relating to identifying customers in difficulty covers all relevant areas? *Yes.* Are there any further comments that respondents have with relation to identifying customers in difficulty? *Advice on energy efficiency, benefit entitlement checks, prepayment meters and signposting to local advice agencies such as Bryson Energy and Advice NI should be included.*

- Q11.** Do respondents think that the section of the Code Annex 1 relating to payment arrangements and monitoring covers all relevant areas? *Yes.* Are there any further comments that respondents have with relation to payment arrangement and monitoring? *No.*
- Q12.** Is there any further information you wish to provide in respect of Fuel Direct or Third Party Deductions? *No.*
- Q13.** Respondents are asked for their opinion on the proposals for disconnection and reconnection fees. We would ask for supporting information on any comments made. *We agree that all reasonable steps to avoid disconnection for reasons of debt should be a licence condition for suppliers.*
- Q14.** Do respondents think that the section of the Code in Annex 1 relating to methods and procedures to avoid disconnection covers all relevant areas? *Yes.* Are there any further comments that respondents have with relation to identifying customers in difficulty? *Prepayment meters may not be the best method for all customers, ie it might not be that easy for customers living in rural areas to top-up.*
- Q15.** Do respondents think that the section of the Code in Annex 1 relating to providing accurate and timely bills covers all relevant areas? *Yes* Are there any further comments that respondents have with relation to providing accurate and timely bills? *No.*
- Q16.** Are there any other areas which the Code on Payment of Bills should cover? *No.*
- Q17.** Do respondents agree that a consistent definition of debt across suppliers, for the purpose of the Code of Practice on the Payment of Bills, should be established? *Yes*
- Q18.** Respondents are asked their opinion on the proposed definition of debt with regards to the Code of Practice on Payment of Bills or suggest an alternative definition which may be used across all suppliers. We would ask respondents to provide supporting information as to why a specific definition would be appropriate and be mindful of monitoring procedures as part of their response. *We agree with the proposed definition.*
- Q19.** Respondents are asked to provide any additional comments on the attached draft Code minimum content, which they feel will help to improve the Code. *No comment.*
- Q20.** How could suppliers monitor self-disconnection and self-rationing in prepayment customers? *Monitor the frequency of top-ups/payments for energy.*
- Q21.** Do respondents think that the section of the Code in Annex 2 relating to the services provided covers all relevant areas? *Yes.*
- Q22.** Do respondents think that the section of the Code in Annex 2 relating to disconnection of customers who are of pensionable age, disabled or chronically sick covers all relevant areas? Are there any further comments that respondents have with relation to disconnection? *Alternatives to disconnection for gas customers of pensionable age, disabled or chronically sick during March – October should be considered to ensure these customers aren't disconnected during this time if the weather is well below average for the time of year or depending on what part of Northern Ireland they live in. Actively targeting these and low-income customers with energy efficiency and poor money management advice is key.*
- Q23.** Do respondents think that the section of the Code in Annex 2 relating to raising awareness of service provision covers all relevant areas? *Yes* Are there any further comments that respondents have with relation to awareness raising? *No.*

- Q.24** Are there any other areas which the Code of Practice on provision of services for persons who are of pensionable age or disabled or chronically sick should cover? *No.*
- Q.25** Do respondents agree that a consistent definition of a complaint for all suppliers, for the purpose of the Code of Practice on Complaints Handling Procedure, should be established? *Yes.*
- Q.26** Respondents are asked their opinion on the proposed definition of a complaint with regards to the Code of Practice on the Complaints Handling Procedure or suggest an alternative definition which may be used across all suppliers. We would ask respondents to provide supporting information as to why a specific definition would be the most appropriate and be mindful of monitoring procedures as part of their response. *For monitoring purposes it may be easier to split the complaints in to categories ie cause of complaint.*
- Q.27** Do respondents think that the section of the Code in Annex 3 relating to the accessibility of complaints handling procedures covers all relevant areas? *Yes* Are there any further comments that respondents have with relation to accessibility? *No.*
- Q.28** Do respondents think that the section of the Code in Annex 3 relating to the transparency of complaints handling procedures covers all relevant areas? *Yes* Are there any further comments that respondents have with relation to transparency? *No.*
- Q.29** Do respondents think that the section of the Code in Annex 3 relating to the promptness of complaints handling procedures covers all relevant areas? *Yes* Are there any further comments that respondents have with relation to effectiveness? *No.*
- Q.30** Do respondents think that the section of the Code Annex 3 relating to alternative dispute resolution covers all relevant areas? *Yes* Are there any further comments that respondents have with relation to alternative dispute resolution? *No.*
- Q.31** Are there any other areas which the Code of Practice on Complaints Handling Procedure should cover? *No.*
- Q.32** Do respondents have any comments to make on the proposed industry standard to update prepayment meters for a change in tariff? *No* Do respondents have any comments to make on how customers can be informed to ensure they understand this process? *No.*
- Q.33** Do respondents think that the section of the Code in Annex 4 relating to the information provision covers all relevant areas? *Yes* Are there any further comments that respondents have with relation to information provision? *No.*
- Q.34** Do respondents think that the section of the Code in Annex 4 relating to the suitability of a prepayment meter covers all relevant areas? *Yes.*
- Q.35** Do respondents think that the section of the Code in Annex 4 relating to payments for prepayment customers covers all relevant areas? *Yes* Are there any further comments that respondents have with relation to payments? *No.*
- Q.36** Are there any other areas which the Code of Practice on Services for Prepayment Meter Customers should cover? *For purposes of consistency all suppliers should desist from accruing standing charges on vacant dwellings as these charges will only eat into top-ups made by the new occupants.*

