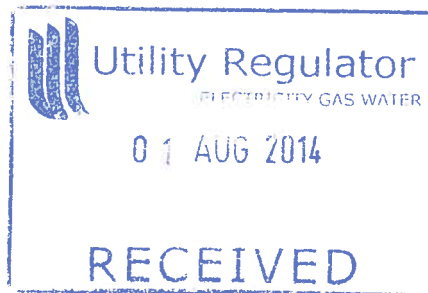


L75107114

25 July 2014

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



**Strabane**  
District Council  
Comhairle Ceantair  
an tSraitha Báin  
Strabane Destríck Council

Dear Ms Dynan

**RE: Consultation on the Implementation of an Energy Supplier Code of Practice**

Strabane District Council would like to take this opportunity to put forward the following points in relation to the Implementation of an Energy Supplier Code of Conduct:

The Code of Conduct put in place should be viewed as baseline guidance for energy providers; this would encourage providers to go above and beyond the minimum recommended standards. This would have the capacity to lead to better standards of provision and customer care for the general public.

The Code of Conduct should also ensure that vulnerable members of society e.g. customers who are sick/elderly are given appropriate customer care. Many members of this age group do not have internet access and too often are referred to online support mechanisms that are unsuitable for meeting their needs/requirements. This issue should also be taken into account when suppliers are communicating generally with their customers i.e. regarding price increases/changes. This type of information should be communicated to customers in the most appropriate fashion for their circumstances.

Strabane District Council would also support a Code of Practice that would actively encourage competitive market conditions. In our District there are several communities who host wind farm developments which contribute significantly to meeting the required European renewable energy targets. However, to date this had created no reduction in energy prices.

In relation to the definition of debt, Strabane District Council feels that the proposed definition is sufficiently clear. Council would however, advocate more emphasis being placed on communication with customers who choose to self-disconnect their supply.

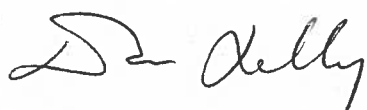
Particular attention should be paid to this in the winter months. In cases where back billing occurs, Council supports the view that if the debt has been incurred as a result of the energy supplier then they should take responsibility for the deficit.

Regarding the disconnection of customers of pensionable age, who have a disability or are seriously ill, Strabane District Council would encourage that the Code of Practice would advocate that there be no disconnection for vulnerable customers at all, where possible. Although this is currently the case in the winter months, given climate conditions in Northern Ireland, disconnection of supply could have extreme consequences for older or sick people throughout the year, not just from November-March.

Strabane District Council would also like to highlight the importance of the protection of the prepayment meter customer. Given that there is a high level of these customers in Northern Ireland and that this form of payment can be associated with previous difficulties with making payment for supply, this should be recognised in relation to the Code of Practice. Energy suppliers should also take into account if this form of provision is appropriate for the customers who avail of it e.g. if the property houses a sick or vulnerable person could there be a possibility of the meter not being 'topped up' when necessary.

Finally, Strabane District Council would like to thank the Utility Regulator for the opportunity to respond to this consultation in relation to the Energy Supplier Code of Practice.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'D. Delly', written in a cursive style.

Chairman of Strabane District Council