**RE: Utility Regulator (UREG) Proposed approach to Best Practice framework programme**

**Response from the Commissioner for Older People for Northern Ireland**

**03.05.22**

Janet Diffin

The Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6ED

**03 May 2022**

**RE:** **Utility Regulator (UREG) Proposed approach to Best Practice framework programme**

Dear Janet

I am writing on behalf of the Commissioner for Older People for Northern Ireland (COPNI). The Commissioner for Older People is an independent voice and champion for older people whose legal powers and duties are defined by the Commissioner for Older People (Northern Ireland) Act 2011. This is a statutory role, at arms-length of government, which takes an active role in safeguarding and promoting the interests of older people in Northern Ireland.

COPNI welcomes the opportunity to engage with this consultation and UREG’s proposed approach to the new Best Practice Framework (BPF) programme.

**Proposed Principles**

COPNI is encouraged and welcomes the proposed principles of the improved BPF, including the new code of practice and the proposal to ensure that utility suppliers and Distribution Network Operators (DNOs) and suppliers promote and establish a corporate culture that focuses and fosters better efforts to identify and support consumers in vulnerable circumstances.

**Principle 1: Utility suppliers and Distribution Network Operators (DNOs) will proactively establish and promote a corporate culture that focuses and fosters their efforts to identify and support consumers in vulnerable circumstances.**

COPNI welcomes the new requirements for companies to actively increase uptake of care registers and the additional support and protections this will afford vulnerable older utility customers and the proposed new requirement on companies to seek, secure and maintain the current BSI 18477 accreditation or the upcoming ISO accreditation BS ISO 22458.

**Principle 2: Consumers in vulnerable circumstances will experience tailored support and positive outcomes when interacting with utility suppliers and Distribution Network Operators (DNO).**

COPNI fully supports these principles. The measure detailed under principle 2 to actively refer customers to relevant support organisations has to the potential to provide essential additional assistance to customers experiencing vulnerability.

**Principle 3: Consumers in vulnerable circumstances will feel able to disclose information in relation to their support needs and understand that this disclosure will enable them to have their needs addressed appropriately.**

COPNI fully supports Principle 3 and looks forward to the measures included in this principle those requiring companies to actively engage in campaigns to improve up-take of relevant care registers.

**Principle 4: Consumers in vulnerable circumstances will have their needs recorded in the most appropriate way, enabling access to the most relevant support.**

COPNI supports this principle and the listed measures. These are positive actions and we are encouraged by the attempt to reach out to vulnerable customers.

**Principle 5: Consumers in vulnerable circumstances will receive support in relation to security of their utility supply and personal safety requirements**

COPNI welcomes the reaffirmation of the existing moratorium on disconnection of vulnerable customers during winter months as contained in Principle 5. However, regarding the issue of disconnecting customers during winter months, COPNI is mindful that these protections do not extend to customers using prepayment meters. The new proposed requirement for energy companies to do more to identify prepayment customers experiencing vulnerability is welcome, however, COPNI would like to see more detail on what measures can be taken to identify and record the numbers of those customers self-disconnecting and what additional support is being taken to support customers in such circumstances to avoid the disconnection of service.

**Principle 6: Consumers in vulnerable circumstances will receive relevant, timely and accessible information on the support available**

COPNI also welcomes the stipulation in Principle 6 to provide information and advice to vulnerable customers but would like to see these go further to incorporate additional relevant advice and assistance. The Utility Regulator’s 2022 Consumer Insight Tracker (CIT) found that 52% of electricity consumers have never switched suppliers. The same report shows that potentially 51% of consumers over 65 who have switched are on the Standard Variable Tariff (SVT) which is in many cases the most expensive tariff1.

COPNI would ask the UREG to consider the inclusion of new measures that propose a requirement for energy companies to alert vulnerable customers to the availability of other cheaper payment methods and tariffs, the availability of a free meter move were required, and if prepayment is no longer practical for them or has the potential to not be, that they are able to move to another payment method particularly in the case of the gas prepayment method, which has no means to top- up through telephone or online services.

UREG has stated in the consultation document that it is pleased with the existing action taken by energy companies in response to customers self-isolating and needing to top-up. COPNI would like to see details of the options in place that provide assistance to vulnerable, older customers using prepayment meters, in circumstances where they are required to self-isolate or by virtue of illness or restricted mobility cannot leave their home and are having trouble topping up by visiting a pay-point facility and the manual insertion of their card into their meter.

**Principle 7: Consumers in vulnerable circumstances because of affordability difficulties will be provided with targeted support by their utility supplier.**

**Principle 8: Consumers in vulnerable circumstances will experience consistency and improved ease of access to the support provided by utility suppliers and Distribution Network Operators (DNOs) through the cross-industry sharing of relevant data.**

1.https://www.uregni.gov.uk/files/uregni/documents/2022-03/niaur-domestic-tracker-written-report-28feb22.pdf

**Principle 9 Utility suppliers and Distribution Network Operators (DNOs) will monitor and report on how they are meeting their obligations in relation to the protection of consumers in vulnerable circumstances.**

**Principle 10: Consumers will have easy access to relevant information on how well utility suppliers and Distribution Network Operators (DNOs) are supporting consumers in vulnerable circumstances**.

The greater transparency requirement on energy companies to report on their performance on supporting vulnerable consumers is a very welcome step for the Regulator, consumers and for organisation’s providing support to energy customers, and is a welcome measure within these principles. The additional measures regarding debt and disconnection, and allowing those experiencing debt greater flexibility in respect to payment plans to avoid disconnection are encouraging and we commend the Regulator for the inclusion of these measures and the potential benefits these will provide to those experience financial vulnerability.

COPNI looks forward to working with UREG on the BPF and related areas and thanks the UREG on the work undertaken thus far, and the potential benefits for vulnerable consumers that the new BPF will provide.

If you wish to discuss this response or the strategy further, I can be contacted on the details below.

Clare Mullen

Head of Policy

COPNI

Equality House

Shaftesbury Square

Belfast BT2 7DP

Or by email to [clare.mullen@copni.org](mailto:clare.mullen@copni.org)

Yours sincerely

**Clare Mullen**

**Head of Policy**

**Commissioner for Older People for Northern Ireland**