

13 September 2023

Rachel Strong
The Utility Regulator
14 Queens Street
Belfast
BT1 6ED

Dear Rachel,

Response to Best Practice Framework Proposals: Code of Practice for Consumers in Vulnerable Circumstances Consultation

Introduction

firmus energy currently operates as a bundled Distribution (feDL) and Supply business (feSL). We welcome the opportunity to respond to the Utility Regulator's Best Practice Framework proposals on the Code of Practice for Consumers in Vulnerable circumstances. firmus energy has engaged extensively with the Utility Regulator in relation to the Consumer Protection Programme and are pleased to have the opportunity to provide further insight and evidence regarding the proposed new principles and measures.

The remainder of this letter provides a joint response on behalf of firmus energy Distribution (feDL) and firmus energy Supply (feSL) to the questions outlined in the consultation published on 22nd June 2023. Specific comments relating to feDL or feSL will be noted as such.

Q1. Do you agree that where this document has an impact on the groups listed, those impacts are likely to be positive in relation to equality of opportunity for utility consumers?

firmus energy believes any impact is likely to be positive. However, we would note that implementing the measures detailed in the Code of Practice (CoP) for Consumers in Vulnerable circumstances could result in additional costs for Network Operators and Suppliers. These additional costs will ultimately be passed on to the consumer, therefore it may be that these measures to benefit the vulnerable could end up being partially paid for by all consumers.

Q2. Do you have comments on any of the UR proposed decisions set out in section 2? Please clearly state in your response which decision your comments relate to.

firmus energy supports the proposed decisions detailed in section 2 and believe these proposals will enable the delivery of a service capable of empowering all consumers who fall within the new vulnerability definition. firmus energy recognises its responsibilities relating to vulnerable customers and has continued to demonstrate its commitment to improving how the company manages and provides for customers in this regard. Nevertheless, there are certain categories and forms of vulnerability that may prove challenging in terms of identification and required management. Although firmus energy have sourced excellent ongoing vulnerability training for our customer service staff, it must be recognised that firmus energy staff are not qualified medical or mental health experts and therefore in many circumstances identification or recording of customer vulnerability will require a level of support and openness from the customer. The decision to create a standardised utility sector definition of consumer vulnerability is welcomed, however, as acknowledged by the Utility Regulator in section 2.2 of the decision paper, the practical operation and application of transient vulnerability remains a concern for firmus energy. Recording varying degrees of transient vulnerability may not necessarily result in benefit to the customer. Management of transient vulnerability presents significant challenges for firmus energy and relies heavily upon a customer's willingness to share personal and sensitive information. Further to this we would request that the Utility Regulator shares the advice from their engagement with ICO as soon as possible. We would also request that gas Suppliers and gas Distribution Network Operators (DNOs) are included in future engagement to ensure there is a consistent understanding of the advice and identification of any issues or risks. This would also avoid multiple parties attempting to engage with the ICO on this matter.

Q3. Do you have comments on the URs proposal on industry working groups as set out in section 3? Please clearly state in your response which aspect of the proposal that your comments relate to

firmus energy considers the industry working groups' focus should be on developing the customer care register as it offers the opportunity to streamline operations for the future. By investing resources into development of a customer care register as a longer-term goal, the working group can create a more efficient and cost-effective data system that will serve the needs of vulnerable consumers across industry better in the future. The proposed CoP for Consumers in Vulnerable Circumstances now

provides the framework for industry to work to. firmus energy therefore believe that the benefit of industry procedures would be limited, with time better spent working through the operationalising of the customer care register.

firmus energy has some concerns about proposals 3.14 and 3.15, for one gas DNO to be customer care register holder. The interim solution of one gas DNO adopting the role of customer care register holder will take significant time and resources with potential system development at a cost to all gas DNOs and Suppliers. Rather than streamlining processes, there is the potential for this to add further complexities to processes across the industry. firmus energy therefore believes that the focus should be on the long-term solution of a centralised customer care register and believe this would be better positioned with an independent body. We would welcome further engagement and discussion with the Utility Regulator and industry on this matter.

Q4. Do you have comments on the UR proposed decision set out in section 4?

firmus energy is supportive of the proposed decision to include the ten principles in the CoP along with specific required measures applicable to relevant licence holders.

Q5. Do you have comments on any of the UR proposed decisions set out in section 5? Please clearly state in your response (using the measure number) which decision your comments relate to.

firmus energy is largely supportive of the proposed decisions set out in section 5, however we would welcome clarity on a number of these decisions as detailed below. Appendix 1 includes a table with firmus energy's response to each individual measure.

- **3.3 Inform all your domestic customers, at least annually, on the existence of customer care registers and how to be added to the customer care register, if eligible.**

Gas DNOs have no direct communication with customers after the point of connection, feDL would therefore consider the requirement to advise domestic customers of the existence of customer care registers annually to be more appropriate for gas suppliers to fulfil.

- **4.1 All companies will have an adequate Data System that is interoperable with industry systems used for customer care registers and will support the inputting, holding and maintaining of an adequately detailed consumer profile with regards the customer's specific support needs.**

The implementation of a data system that is interoperable with industry systems may present difficulties in practical application. The main challenge relates to what unique identifier can be used for each property given there are different individual reference points used across the industry. Data relating to a consumer's address may differ slightly across industry and may be difficult to reconcile. firmus energy believe there will be significant work to align consumer data across the industry and believe that using data held by the electricity network operator, NIE, could be the most appropriate to ensure consistency across industry. This would mean limited system development for NIE, and utilising an existing unique identifier to deliver the long-term goal of a centralised customer care register would be beneficial.

- **4.2 Ensure that the customer care register holds sufficient information (in line with existing Data Protection legislation) on the needs or requirements of the domestic customers who are considered vulnerable due to age, disability or chronic illness [medical customer care register] and/or mental health status or other reason covered under the definition of vulnerability.**

firmus energy would welcome guidance from the Utility Regulator on what information is deemed sufficient for a company to hold within the customer care register. This data has the potential to be very sensitive and customers may be reluctant to share sensitive information with Utility companies. Collecting and storing sensitive customer data in a centralised customer care register poses significant privacy risks. As such we believe that minimal customer data should be collected for the customer register.

- **4.3 Customer care register holders should contact all registered customer care consumers (or a nominated representative) at least every two years to ensure they are receiving the necessary support. This should be a meaningful contact, by the consumers preferred method of contact, to re-assess the level of support they require.**

firmus energy is supportive of the measure for registered customer care consumers to be contacted at least every two years, however we believe that for customers experiencing transient vulnerability, a prescribed timeline for automatic removal from the customer care register would be more appropriate. Customers with transient vulnerabilities often experience rapid changes in circumstances and waiting two years to contact them may result in missed opportunities to provide timely assistance or support. Having a prescribed period for automatic removal from the customer care register, which would be explicitly stated when the customer consented to be added to the register, would prevent unnecessary intervention, and allow resources to be allocated more effectively. Implementing a system that can automatically remove transient customers from the care registers after a prescribed period e.g., six months, will free up resources to focus on those consumers in greater need.

- **4.4 Customer care register holders must carry out a data cleanse of customer care registers every two years. Removal of consumers should only take place after a minimum of three attempts to contact the consumer via the consumers' preferred method of contact.**

firmus energy is supportive of this measure, however, as noted in our response for measure 4.3, firmus energy believe that transient vulnerable customers should automatically be removed after a prescribed period, thus freeing up resources to ensure the data cleanse is carried out effectively and efficiently.

- **7.3 All companies will use best endeavours to proactively identify consumers who are at risk of self-disconnecting and provide advice and support/financial assistance where appropriate.**

firmus energy recognise the potential benefits of supply companies proactively identifying self-disconnecting consumers, however firmus energy do not believe that this measure should be applicable to gas DNOs. Gas DNOs have limited interaction with customers after the point of connection. Gas DNOs do not hold enough data to determine if any consumer is at risk of self-disconnecting. If siteworks or a safety check at a property determines that the customer is experiencing difficulties, this information can be fed back to the Supplier who can then provide the adequate support and information to the customer.

Without clear guidelines as to the specific definition and criteria that constitutes self-disconnection, it is a) impossible to compare individual usage, as the reason for self-disconnection may vary significantly; and b) difficult to evaluate if the self-disconnection is causing detriment to the customer. Not all temporary self-disconnections cause a detriment to customers. For example, when a property is empty, failure to top up is situational, rather than behavioural and the customer suffers no detriment. The majority of feSL customers have PAYG meters, customers move in and out of properties and do not register their account, therefore we are frequently left with out-of-date information for properties and the only method of communication is post which many consumers may choose to ignore. Unless consumers proactively contact us to advise of a change of tenancy or a bereavement, we may not have up to date information to contact potentially vulnerable PAYG consumers. To be able to more readily identify customers who have self-disconnected would require visibility of the current credit status on the meter, and this is currently not possible with the meters used in NI. Each household has its own unique consumption pattern, and it is difficult to flag any accounts that may be experiencing a vulnerable period. firmus energy would welcome engagement with the Utility Regulator to better understand how they envisage the practical application of Suppliers proactively identifying consumers who are at risk of self-disconnecting. We would also welcome engagement to understand how gas DNOs will be able to proactively identify consumers at risk of self-disconnecting given the limited contact that gas DNOs have with customers. Will the Utility Regulator be providing guidance or are best endeavours to be developed with industry at the working groups?

- **7.5 Do not disconnect a customer for debt if they are actively engaging with their Suppliers.**

feSL would welcome further engagement from the Utility Regulator on this proposed measure. feSL take all reasonable steps to interact with customers regarding debt, and disconnection will only ever be used as a last resort. This is reflected in the very low number of disconnections that feSL carry out each year. The majority of feSL customers in debt are actively engaging with feSL to agree repayment plans or have agreed repayment via a debt recovery tariff, however there are situations where a customer can be engaging with feSL and not making any payments despite agreeing to a payment plan. The customer will still continue to engage, with feSL attempting to find a workable solution, the process for setting a different payment plan will recommence only for the customer to again fail to action payment. firmus energy believe that there should be thresholds or timelines in place which will provide feSL the option to progress with the

disconnection process for customers who are not making the agreed repayments and therefore not “actively” engaging. firmus energy would welcome engagement from the Utility Regulator to understand how they define a customer ‘actively engaging’.

- **8.1 All companies to establish, implement and maintain effective data sharing methodologies to enable the effective use of consumer data by any relevant party licenced to convey/supply gas or distribute/supply electricity or supply water to the domestic consumer’s premises under the Gas Order, Electricity Order, and or the Water and Sewerage Services Order in an appropriate form and at appropriate intervals.**

firmus energy support the establishment of data sharing methodologies across industry however believe there is significant work and resource required to establish, implement, and maintain an effective data sharing methodology across industry. As mentioned above in response to measure 4.1, one of the main issues is a unique identifier that is necessary to allow data to be shared across industry and fulfil the long-term goal of a centralised customer care register. Without a unique identifier, customer data will be split across different systems making it difficult to provide efficient and personalised customer care. This will lead to inefficiencies, inconsistencies with data held and customers not achieving the full benefit of the centralised customer care register. firmus energy agree that having an agreed methodology for data sharing across industry will improve the efficiency for consumers in vulnerable circumstances and enhance the overall experience for these customers across industry. Alongside the issue of a unique identifier, firmus energy have concerns about how data will be shared and the risks that come with sharing sensitive data across industry. As previously mentioned, we request that the Utility Regulator provide information on their engagement with the ICO to allow us to better understand any issues prior to engaging with industry working groups.

- **10.1 All companies to conduct research and engagement with consumers in vulnerable circumstances, to include those on customer care registers (every two years at a minimum). A copy of the final research report must be submitted to the Authority and a public version made available.**

firmus energy is supportive of the measures under principle 10, however we believe that these measures should only be applicable to Suppliers. firmus energy do not believe Gas DNOs are suitably positioned to adopt this measure. Companies carrying out research and engagement with consumers in vulnerable circumstances will require additional resourcing and costs to facilitate. firmus energy would welcome engagement from the Utility Regulator to better understand the mechanisms that would be used to recover these costs.

Q6. Do you have comments on the URs proposal on the new structure for registering consumers in vulnerable circumstances as set out in section 6? Please clearly state in your response which aspect of the proposal that your comments relate to.

firmus energy support the proposed new structure for registering consumers in vulnerable circumstances, however as mentioned in our response to question 3 we believe the focus should be on the long-term goal of creating a centralised utility customer care register. With the number and scale of other ongoing projects across industry, time and resources are limited and diverting them towards the interim solution may be counterproductive. firmus energy believe it is essential to prioritise the development of a robust, sustainable data system from the outset that can provide ongoing support for consumers in vulnerable circumstances. Instead of developing the interim goal of a customer care register for each industry initially, the working group could channel its efforts into developing a centralised data system which will address both short term and long-term needs which will save time and resource in the long run. An interim solution may only cause further problems and data management errors leading to inaccurate information and frustration for both consumers and companies responsible for providing the relevant services to these consumers. Achieving the long-term goal of a centralised customer care register will lead to improved customer satisfaction.

With the introduction of the CoP for Consumers in Vulnerable Circumstances, feSL seek to understand if this CoP will supersede the requirement to comply with the CoP on Provision of Services for Persons who are of Pensionable Age, Disabled or Chronically Sick. feSL believe the measures and applicable criteria for the CoP on Provision of Services for Persons who are of Pensionable Age, Disabled or Chronically Sick are covered with the CoP for Consumers in Vulnerable Circumstances. firmus energy therefore would welcome clarification from the Utility Regulator on this matter.

Similarly, we would welcome engagement from the Utility Regulator on the two-tiered element of the customer care register. firmus energy recognise the need for a two-tiered approach across industry given the different services that will be available, however with the needs-based tier we believe there will still be a requirement to record the individual vulnerability and discuss with the consumers the relevant services we can offer to accommodate their needs. This is particularly relevant for consumers experiencing transient vulnerability. firmus energy do not believe it appropriate to record services being offered to a transient vulnerable customer without previously identifying that their vulnerability is transient. firmus energy believe the services that can be offered to transient vulnerable customers should be limited and in line with their vulnerability. For example, firmus energy do not believe it would be appropriate to relocate a meter for a transient vulnerable customer as we believe this service would require a consumer to be identified as having a fixed vulnerability. Given the broad remit of needs that could be identified for customers experiencing transient vulnerability, firmus energy believe it will not provide the customer any additional benefits to register them on the customer care register, beyond what firmus energy currently offer.

For customers disclosing a vulnerability and consenting to be added to the customer care register, firmus energy would seek engagement from the Utility Regulator to understand if Suppliers and Network Operators should request any proof of the relevant vulnerability prior to recording them on the customer care register or does the Utility Regulator deem it appropriate to accept a customer's disclosure of a vulnerability at face value.

Q7. Do you have comments on the URs proposed licence conditions as set out in section 7? Please clearly state in your response which aspect of the proposal that your comments relate to.

firmus energy support the proposed licence conditions detailed in section 7, however we believe there will be a requirement to include an additional licence condition specific to the Customer Care register holder and subsequently an update to the relevant DNO and Supplier licences relating to the Customer Care register holder and the obligations for DNOs and Suppliers to provide information.

Q8. Do you have comments on the URs proposal compliance and monitoring as set out in section 8? Specifically, we seek comments on stakeholders preferred monitoring option(s). Please clearly state in your response which aspect of the proposal that your comments relate to.

firmus energy is supportive of the Utility Regulator's proposal on compliance and monitoring and agree with the Utility Regulator that monitoring compliance is best facilitated through the existing REMM framework.

Q9. Do you have comments on the URs proposed timelines for implementation as set out in section 9? Please clearly state in your response which aspect of the proposal that your comments relate to.

firmus energy believe the timelines in place to operationalise the full requirement of the Code of Practice are not achievable. firmus energy believe the development of the customer care register and the relevant data sharing methodologies required will take longer and require significant resources from both Network Operators and Suppliers to implement. firmus energy believe that establishing a customer care register requires a timeline separate from all other measures within the CoP. The measures not relating to the customer care register build on existing processes that are already operational within firmus energy, and we believe the timelines are adequate to ensure full compliance with these measures. We would therefore request that the Utility Regulator revise the timelines to ensure that there is adequate provision, time and resource dedicated to ensuring the implementation of all measures within the CoP.

Conclusion

We trust this response proves useful in helping to shape the Code of Practice for consumers in vulnerable circumstances and we reiterate our continued commitment to future engagement with the UR and wider industry stakeholders on these matters.

Kindest regards,



Mark Stevenson
Director of Regulation

Appendix 1

| Measure No | Measure Detail | firmus energy comment |
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| Principle 1 | | |
| Measure 1.1 | All companies to adopt the UR's vulnerability definition: 'A consumer is deemed vulnerable when their personal characteristics or circumstances reduce their ability to engage effectively and achieve fair outcomes. A vulnerable consumer is significantly less able to protect or represent their interests and significantly more likely to suffer detrimental impacts on their health, wellbeing or finances.' | Agreed |
| Measure 1.2 | Obtaining the BS ISO 22458: 2022 Consumer Vulnerability standard is recommended to all companies (but not required). The BS ISO standard will be aligned to the CoP requirements, so will evidence (for those companies who obtain it) compliance with a number of the CoP requirements. | Agreed – it is firmus energy's intention to obtain BS ISO 22458 |
| Measure 1.3 | All companies should have a specialist vulnerability team or person (dependent on the size of the business) within the appropriate part of the business to champion innovative strategies for the treatment of consumers displaying signs of vulnerability (including the use of inclusive design principles). This vulnerability team should include a staff member at a senior level and will represent, mentor and oversee the company's work on vulnerability. | Agreed |
| Principle 2 | | |
| Measure 2.1 | Ensure that all relevant staff (e.g., consumer facing staff, field staff, call centre handlers, and sub-contractors) and to include staff at a senior level, are adequately and frequently trained in the identification of consumers in vulnerable circumstances or /and who may be eligible for the customer care register, and in treating customers in an empathetic manner to encourage customers to self-identify. To include, but not exclusive to, disability training (in relation to hidden disabilities, learning difficulties or communication barriers), mental health awareness training and empathy training. | Agreed |
| Measure 2.2 | All companies to remove call duration targets for vulnerability and affordability themed calls. | N/A, firmus energy does not set call duration targets. |

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| Measure 2.3 | Ensure there is always a person(s) on duty during call centre operating hours who has the authority to make flexible decisions in relation to the support provided to consumers represented by the UR's vulnerability definition. | Agreed |
| Measure 2.4 | Establish a partnership between consumer representative bodies and Suppliers/network companies (which can be readily evidenced and which is intentionally cultivated and maintained) to raise awareness of the existence of customer care registers amongst members and clients. | Agreed |
| Measure 2.5 | Ensure processes are in place to enable a warm handover of consumers in vulnerable circumstances who are in need of additional support. | Agreed |
| Measure 2.6 | All companies to provide a phone number for consumers that will not incur a premium rate charge, alongside providing other avenues for customer contact that are free of charge (to include as a minimum a call back option). | Agreed (note firmus energy general number is standard rate) |
| Principle 3 | | |
| Measure 3.1 | All Regulated Companies: Provide the applicable customer care register holder with the relevant and lawful details (required for the customer care register), of any domestic customers who are of pensionable age, disabled or chronically sick [medical care register], or are represented by the UR's vulnerability definition, and who wish to be included on the list. | Comment provided in response to question 6 |
| Measure 3.2 | Customer care register Holder: Establish and maintain a customer care register of domestic customers who are of pensionable age, disabled or chronically sick [medical care register], or are represented by the UR's vulnerability definition and who wish to be included on the list. Provide a secure transfer channel for relevant Suppliers and DNOs to share details of their consumers who require or need updating on the customer care register. Update the customer care register in a timely manner following receipt of data from Suppliers and/or DNOs. Only applies to Customer care register Holder | Comment provided in response to question 6 |
| Measure 3.3 | Inform all your domestic customers, at least annually, on the existence of customer care registers and how to be added to the customer care register, if eligible. | Comment provided in response to question 5 |
| Measure 3.4 | Actively promote customer care registers (to encourage greater identification and sign up | |

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| | of eligible customers) to the wider public through a number of different communication channels such as, but not limited to, social media, websites, outreach events and advertisements. Engagement should occur with at least one consumer representative body in developing and/or delivering the promotion. Companies must be able to evidence promotional activity through at least 3 different communication channels each year. This activity can be delivered in collaboration with other utility companies and/or consumer representative bodies. | <p>Agreed</p> <p>Note: if this is a regulatory requirement, would the Utility Regulator envisage granting allowances for this promotional activity</p> |
| Measure 3.5 | All companies to use best endeavours during any customer interaction to proactively identify when someone is experiencing a potentially vulnerable period and make contact with them to establish if they are need of support. | Agreed |
| Measure 3.6 | Take all reasonable steps to ascertain whether an occupant of a domestic property and/or the bill payer falls within the scope of eligibility to be added to the customer care register, and if eligible add the consumer to the customer care register (subject to their consent). | <p>Agreed</p> <p>Query – is the register to capture ‘any’ vulnerable occupant of the property?</p> |
| Principle 4 | | |
| Measure 4.1 | All companies will have an adequate Data System that is interoperable with industry systems used for customer care registers and will support the inputting, holding and maintaining of an adequately detailed consumer profile with regards the customer’s specific support needs. | Comment provided in response to question 5 |
| Measure 4.2 | Ensure that the customer care register holds sufficient information (in line with existing Data Protection legislation) on the needs or requirements of the domestic customers who are considered vulnerable due to age, disability or chronic illness [medical customer care register] and/or mental health status or other reason covered under the definition of vulnerability. | Comment provided in response to question 5 |
| Measure 4.3 | Customer care register holders should contact all registered customer care consumers (or a nominated representative) at least every two years to ensure they are receiving the necessary support. This should be a meaningful contact, by the consumers preferred method of contact, to re-assess the level of support they require. | Comment provided in response to question 5 |

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| Measure 4.4 | Customer care register holders must carry out a data cleanse of customer care registers every two years. Removal of consumers should only take place after a minimum of three attempts to contact the consumer via the consumers' preferred method of contact. | Comment provided in response to question 5 |
| Principle 5 | | |
| Measure 5.1 | Take all reasonable steps to not disconnect a customer who has not paid their bill and is of pensionable age, disabled or chronically sick and lives alone and who are represented by the vulnerability definition or only with other persons who are of pensionable age, disabled, chronically sick or under the age of 18, or with a dependent aged under 5 years and who are represented by the UR's vulnerability definition. Only applies to Suppliers | Agreed – for firmus energy disconnection is always a last resort and we will work with all customers to avoid this outcome |
| Measure 5.2 | Take reasonable steps to avoid disconnecting the supply to premises where a bill has not been paid and includes an occupant who is of pensionable age or disabled or chronically sick or under the age of 18, or with a dependent aged under 5 years and who are represented by the UR's vulnerability definition during any winter period, that is to say, a period beginning with 1 Oct in any year and ending 31 March in the following year. Only applies to Suppliers | Agreed – as above |
| Measure 5.3 | Ensure a domestic premises which includes an occupant who is of pensionable age or disabled or chronically sick and who are represented by the UR's vulnerability definition can avail of a flexible payment plan for any reconnection charges. This repayment plan must be based on the customers' ability to pay and is to include but not exclusive to the use of instalments. If the reconnection is following disconnection or isolation from the network to ensure safety, the DNO can request an agreement with the customer to regular meter checks for the first year of reconnection | Agreed Note that different arrangements may apply if there has been proven to be multiple instances of tampering from the same individual(s). |
| Measure 5.4 | Arrange a free annual gas safety inspection of the gas appliances and other gas fittings on the customer's side of the meter for households where all occupants are either of pensionable age, disabled, chronically ill, minors or are represented by the UR's vulnerability definition. This does not apply where the landlord of the customer is responsible for the annual inspection in accordance with the Gas Safety (Installation | Agreed – firmus energy currently provide a free annual gas safety inspection for all customers registered on our firmuscare scheme |

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| | and Use) Regulations (Northern Ireland) 2004. The safety inspection must be undertaken by a person possessing appropriate expertise. Only applies to gas Suppliers | |
| Measure 5.5 | Provide special identification for employees authorised by the Licensee to visit households. This will include operation of a password scheme and another telephonic based identification scheme (such as the Quick Check 101 scheme). | Agreed, these arrangements are already in place. |
| Principle 6 | | |
| Measure 6.1 | All companies to provide (free of charge and accessible) advice and information on the additional services available to customers because of their age, disability, or chronic illness and/or who are represented by the UR's vulnerability definition. This should be provided through a number of channels to include, at minimum, the company's website and customer's bills. Advice and information provided must be accessible and displayed (if applicable) in a prominent position. | Agreed |
| Principle 7 | | |
| Measure 7.1 | All companies to provide consumers who are represented by the UR's definition of vulnerability and are experiencing affordability difficulties with their energy bills with the option of a 'warm handover' to a consumer body which can assist them with a benefit entitlement check facility. | Agreed |
| Measure 7.2 | Include the option of 'breathing space' when developing a payment plan for customers in debt who are represented by the UR's definition of vulnerability. Breathing space is a period during which an individual in debt is provided with respite from creditor action in order to fully engage with debt advice and seek sustainable solutions to their debt. The period of time should be decided on a case-by-case basis based on the individuals' circumstances. Only applies to Suppliers | Agreed |
| Measure 7.3 | All companies will use best endeavours to proactively identify consumers who are at risk of self-disconnecting and provide advice and support/financial assistance where appropriate. | Comment provided in response to question 5 |
| Measure 7.4 | Target consumers with a PPM debt on or over a specified amount (£200) and provide an incentive to engage to discuss debt repayment that will include a package of support measures (e.g., warm handover to | Agreed |

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| | organisation who can carry out a benefit entitlement check). Only applies to Suppliers | |
| Measure 7.5 | Do not disconnect a customer for debt if they are actively engaging with their Supplier. Only applies to Suppliers | Comment provided in response to question 5 |
| Principle 8 | | |
| Measure 8.1 | All companies to establish, implement and maintain effective data sharing methodologies to enable the effective use of consumer data by any relevant party licenced to convey/supply gas or distribute/supply electricity or supply water to the domestic consumer's premises under the Gas Order, Electricity Order, and or the Water and Sewerage Services Order in an appropriate form and at appropriate intervals. | Comment provided in response to question 5 |
| Principle 9 | | |
| Measure 9.1 | All companies to submit returns to the Authority which demonstrate compliance with the Code of Practice for consumers in vulnerable circumstances. The returns will provide evidence of compliance with the both the high level principles and the required measures. | Agreed |
| Measure 9.2 | As part of their return, all companies must report on actions taken to increase awareness of the customer care registers (this will be tracked by the UR through the UR's annual domestic consumer insight tracker survey); and on the operation, outcomes and future review arrangements for their activities under the Code. | Agreed |
| Measure 9.3 | In the case of disconnection of a domestic property maintain, for at least six months or where a complaint has been made six months after the complaint has been resolved, a record and evidence of the steps taken to ascertain whether the occupants include persons who are of pensionable age or disabled or chronically sick or minors (aged 0-5 years old) or are represented by the UR's vulnerability definition. This evidence must be provided to the Authority on request. Only applies to Suppliers | Agreed |
| Principle 10 | | |
| Measure 10.1 | All companies to conduct research and engagement with consumers in vulnerable circumstances, to include those on customer care registers (every two years at a minimum). A copy of the final research report must be | Comment provided in response to question 5 |

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| | submitted to the Authority and a public version made available. | |
| Measure 10.2 | All companies to publish an accessible version of the returns submitted to the Authority on compliance with the Code of Practice for consumers in vulnerable circumstances on their own websites. These returns will also be published on the Authority's website. | Agreed |