

26th June 2024

Rachel Strong
Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

Dear Rachel,

Notice and Consultation on Code of Practice for Consumers in Vulnerable Circumstances Licence Modifications

firmus energy welcomes the opportunity to respond to the Utility Regulator's Consultation on Code of Practice for Consumers in Vulnerable Circumstances Licence Modifications. As Distribution Network Operator in Ten Towns and a supplier of natural gas to domestic premises in both the Ten Towns and Belfast network areas, firmus energy recognises the importance of tailored support for customers in vulnerable circumstances and has engaged extensively with the Utility Regulator in relation to development of the Best Practice Framework and Code of Practice for Consumers in Vulnerable Circumstances. This letter provides a joint response on behalf of firmus energy Distribution (feDL) and firmus energy Supply (feSL).

The mandatory nature of the Code of Practice for Consumers in Vulnerable Circumstances, as compared to other minimum standards Codes of Practice, should ensure the support it is designed to provide to consumers is consistently applied across domestic utilities in Northern Ireland and address any current gaps and inconsistencies across sectors. firmus energy therefore supports the appropriateness of the Licence modifications for both supply and distribution to achieve this outcome.

As the Code of Practice becomes embedded and its impact can be fully understood, there will be a need to review and, if necessary, amend to ensure the intended outcomes are being consistently achieved. firmus energy therefore welcomes the provision within the new licence condition permitting the Utility Regulator to modify the Code of Practice following consultation with stakeholders. There should also be provision for licensees to proactively engage with the Utility Regulator should valid cause for modification of the Code of Practice be identified from industry perspective. A bilateral approach will help ensure vulnerable consumers are being afforded the appropriate protections in the most efficient manner.

firmus energy notes that compliance with the Code of Practice will be assured from the Statement of Licence Compliance process and Supply Licensees will be required to provide high level sign-off while DNOs are expected to continue with their existing compliance processes and reporting requirements. We welcome the Utility Regulator's view that licensees should focus first on embedding the new Code of Practice before any further metrics are introduced for compliance or for monitoring purposes through REMM metrics. We would ask that the Utility Regulator engages with suppliers and DNOs as

early as possible when considering what metrics are required to evaluate compliance with the new licence condition, to ensure supplier and DNO processes and reporting mechanisms are capable of delivering the necessary compliance reporting requirements.

firmus energy (feSL and feDL) is fully committed to the implementation of the new Code of Practice for Consumers in Vulnerable Circumstances. We consider the proposed licence modifications will serve to enhance the protections available to those consumers who need it the most. We look forward to working with the Utility Regulatory and other stakeholders to ensure the successful implementation of these new licence conditions.

Regards,

Siobhán Kane

Regulatory Affairs Manager