

Bryson Energy Utility Regulator consultation response

Bryson Energy welcomes the opportunity to comment on the utility regulator consultation.

Bryson Energy are widely responsive of the requirements outlined in the proposal.

Should you require any further information on the responses provided, please contact me.

Q1. Do respondents agree with proposals 1 to 3 set out in Section 3.9

Consumers in vulnerable circumstances? **See page 20-26.**

- Please provide rationale and evidence to support your view.
- Please ensure you identify which specific requirement your response relates to.
- Include any additional requirements that could be included

Bryson Energy agrees with Requirements 1-3.

Requirement 1- In our experience, digital exclusion is something that we come across frequently. Therefore it is important for alternative means of contact to be provided for those who cannot access an online contact form or website.

Requirement 2- We have some concerns about how suppliers will identify vulnerable customers. If a customer doesn't self-identify as vulnerable, how do you ensure vulnerable customers are made aware of these services?

If customers have self-disconnected, are they automatically identified as a vulnerable customer and prioritised for support? We would like to see further evidence around disconnection of the customers- who is protecting those that are disconnected?

If 45% (research by NEA) of households in Northern Ireland are fuel poor, they are likely to find themselves in vulnerable circumstances, therefore will there be an expectation that 45% of supplier's customers will be considered vulnerable?

Requirement 3- In relation to the freephone number, ensure the number is still free from all mobile networks, some network numbers don't allow customers to ring 0800 numbers for free and customers need to be aware of that, or an alternative contact provided.

Q2. Do respondents agree with proposals 1 to 11 set out in Section 3.11

Customer contact centre services? **See page 27-39.**

- Please provide rationale and evidence to support your view.
- Please ensure you identify which specific requirement your response relates to.

- Include any additional requirements that could be included.

Bryson Energy agrees with Requirements 1- 11.

Requirement 5- We welcome the triage system for prioritising calls, in particular the development of the BPF: Code of Practice for Consumers in Vulnerable Circumstances.

Q3. Do respondents agree with proposals 1 to 3 set out in Section 3.12

Supplier processes for setting fixed direct debits? **See page 39-43.**

- Please provide rationale and evidence to support your view.
- Please ensure you identify which specific requirement your response relates to.
- Include any additional requirements that could be included

Bryson Energy agrees with Requirements 1-3.

Q4. Do respondents agree with proposal 1 set out in Section 3.13

Supplier processes for return of customer credit? **See page 43-45.**

- Please provide rationale and evidence to support your view.
- Please ensure you identify which specific requirement your response relates to.
- Include any additional requirements that could be included.

Bryson Energy agrees with Requirement 1.

Q5. Do you have comments on the proposed approach for

implementation, monitoring and reporting as set out in Section 4? **See page 46-47.**

- Please clearly detail what aspect that your comments relate to.
- Please provide rationale and evidence to support your view.

Monitoring- how are the statements of annual compliance being verified? Will this be independently audited on a sample basis to ensure compliance? We understand it's a licence condition, so how can we be confident it is accurate without independent verification? Can there be mystery shopping to ensure compliance with these measures, such as answering calls within 4 minutes and identifying a vulnerable customer etc?

4.9- It is unclear as to who sets the KPIs. Will the results be published and publicly available, to enhance customer experience. As part of the monitoring we would

welcome a public supplier league table to allow customers better choice when choosing their supplier.

Q6. 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? **See page 48.**

Bryson Energy considers the proposals set out in the paper for mandatory requirements help all consumers and we do not anticipate any negative impacts on any groups.

Q7. Do you consider that the proposals need to be refined in any way to meet the equality provisions? **See page 48.**

Bryson Energy don't consider that the proposals need to be refined in any way to meet the equality provisions.