

Energy Supplier Customer Service Levels

New Code of Practice on Customer Service and
accompanying licence modifications

Utility Regulator Decision Paper
26 November 2024



About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive and two Executive Directors lead teams in each of the main functional areas in the organisation: CEO Office; Price Controls; Networks and Energy Futures; Markets; Consumer Protection and Enforcement. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.



Abstract

This paper details our decisions following a consultation on proposed mandatory requirements for energy supplier customer service levels for domestic customers, across the four areas outlined below:

- a) Consumers in vulnerable circumstances;
- b) Customer contact centre services (this includes call centres and all mediums of written contact with consumers including social media platforms and emails);
- c) Setting fixed direct debits (at a set amount each month); and
- d) Returning of customer credit that has accrued on the customer account.

This paper outlines the feedback from our consultation, our responses to the comments received and our subsequent decisions. This document sets out our decisions to implement a new Code of Practice on Customer Service (set out in Appendix 1) and licence modifications in relation to setting fixed direct debits and return of customer credit. The statutory notice and consultation on the proposed licence amendments has been published alongside this paper.

Audience

This document is most likely to be of interest to regulated companies in the energy industry, consumer organisations and representatives, community and voluntary organisations, natural gas and electricity consumers, government, and other statutory bodies.

Consumer impact

These measures were developed to remedy customer service level failings impacting a significant number of energy consumers. Implementation of our decisions will require consistent good practice across all energy suppliers, increase the level of consumer protection, and improve the standards of service that domestic customers receive from their energy supplier in key customer service areas. This includes consumers in vulnerable circumstances, customer contact centre services, processes for fixed direct debits and the return of customer credit.

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Executive Summary

It is critical that all consumers are afforded the appropriate protections throughout their engagement in our energy markets. This includes on the levels of customer service that they can expect when dealing with their energy supplier.

We have sought to improve the standards of service provided by energy suppliers for all consumers and, in particular, those in vulnerable circumstances.

In Q4 2022 we were made aware of a rising number of complaints and reports regarding energy supplier customer service levels, setting of fixed direct debits and the return of customer credit. As a result, we undertook a review of supplier performance in these areas through the monthly monitoring of suppliers' contact centre metrics, and by carrying out a review of suppliers' processes on setting and reviewing fixed direct debits.

Analysis of the monthly submissions gave us an important insight into the market-wide customer contact centre performance and provided an evidence base for us to work towards the enhancement of our regulatory framework in these areas.

To address areas of underperformance, we issued an open letter to all domestic gas and electricity suppliers, outlining our concerns in relation to the performance of their customer contact centres. We also held two roundtable discussions with all domestic suppliers and consumer representative bodies to address the issues and discuss options for resolution.

During this time, we also undertook a review of other utility and regulated industries within the United Kingdom and Ireland to identify best practice in relation to the delivery of customer contact centre services, setting of fixed direct debits and the processes around the return of customer credit.

In September 2023 we published a Guidance Note for domestic suppliers which set out our expectations and committed to developing a consultation on mandatory requirements to strengthen protections for consumers relating to customer service provision.

Following the publication of the Guidance Note, we held bilateral meetings with all suppliers to discuss their alignment with the guidance and establish if there were any gaps in their existing processes. We considered the feedback received and updated several of the requirements to ensure that the measures we were consulting on were in the consumer interest. We published our consultation in March 2024.

This Decision paper follows on from that consultation, summarises the stakeholder feedback from the consultation, and sets out our responses to the comments received and our subsequent decisions. The key decision focus on four broad areas:

- a) Consumers in vulnerable circumstances;
- b) Customer contact centre services;
- c) Supplier processes for setting fixed direct debits; and
- d) Supplier processes for return of customer credit.

We have taken on board feedback received by stakeholders and consumer representative bodies during the consultation process as well as considering market outcomes and preventative measures. As a result of this analysis we have amended and/or strengthened the measures, where required, to ensure there are adequate levels of consumer protection.

The measures outlined will be implemented via a new mandatory Code of Practice on Customer Service and new licence requirements. This paper also outlines the next steps for implementation and subsequent monitoring of the new requirements.

The measures proposed represent a baseline standard for our energy suppliers. Suppliers should continue to aim to be the best, raising the bar on the services they provide to consumers both in terms of customer service and consumer protection. We expect all energy suppliers to continue to identify ways in which they can differentiate themselves in the market and deliver ever better standards of customer service performance beyond the mandated minimum requirements. The measures proposed act as a safety net for all consumers, ensuring all consumers are protected; particularly those in vulnerable circumstances.

1. Introduction

Purpose of this document

- 1.1 On 25 March 2024 we published a Consultation paper¹ on Energy Supplier Customer Service Levels (hereinafter referred to as the ‘Consultation paper’). The Consultation paper outlined our proposed mandatory requirements for energy supplier domestic customer service levels across the following four areas:
- a) Consumers in vulnerable circumstances;
 - b) Customer contact centre services (this includes call centres and all mediums of written contact with consumers including social media platforms and emails);
 - c) Setting fixed direct debits (at a set amount each month); and
 - d) Returning of customer credit that has accrued on the customer account.
- 1.2 The Consultation paper proposed that the requirements for consumers in vulnerable circumstances and customer contact centre services would be implemented through a new mandatory Code of Practice (CoP) and the requirements in relation to setting fixed direct debits and the return of customer credit would be implemented through new and/or amended licence conditions.
- 1.3 The purpose of this paper is to:
- Outline the responses to the Consultation paper on energy supplier customer service levels;
 - Set out our decisions on the measures for the new CoP;
 - Detail the proposed licence modifications in relation to the new CoP on Customer Service, setting fixed direct debits and the return of customer credit (the statutory consultation notice is published alongside this paper);
 - Detail monitoring of compliance arrangements for the new CoP on Customer Service and licence modifications, with timelines for implementation; and

¹ [Consultation - Energy Supplier Customer Service Levels](#)

- Present the final CoP on Customer Service (see appendix 1).

Background

- 1.4 In Q4 2022, we were made aware of a rising number of complaints and concerning reports regarding energy supplier customer service levels; specifically in the areas of customer contact centre services, the setting of fixed direct debits and the return of customer credit.
- 1.5 These issues related to customer service levels for domestic consumers only. We have not included any specific measures for non-domestic consumers at this juncture, however we anticipate that overall improvements in suppliers' customer service performance will also benefit this class of customers. We will continue to monitor non-domestic customer service levels and may consider mandatory measures in the future.
- 1.6 We conducted a review of supplier performance in the areas noted above. This was carried out by analysing suppliers' data submissions for their customer contact centre performance, reviewing customer queries, engaging with consumer bodies and appointing Gemserv to carry out a high-level review of how suppliers set and review fixed direct debits. During our review, a number of potential failings in some (not all) suppliers' customer service levels were identified.
- 1.7 From November 2022 we have been monitoring suppliers' customer contact centre performance on a monthly basis. Analysis of the submissions from suppliers has offered an important insight into market-wide customer contact centre performance, provided further context to the reports we had received from individual customers and consumer representative bodies, and is an evidence base for enhancement of our regulatory framework in these areas.
- 1.8 To address these issues, in March 2023 we issued an open letter² to all domestic gas and electricity suppliers, setting out our concerns in relation to the performance of their customer contact centres. We also held two roundtable meetings with all domestic suppliers and consumer representative bodies to discuss the issues and options for resolution.
- 1.9 In September 2023 we published a Guidance Note for domestic energy suppliers to set out our expectations on customer service levels in three areas:
- Customer contact centre services;

² [Supplier open letter from CEO ref Call Centre Issues \(uregni.gov.uk\)](https://www.uregni.gov.uk)

- Processes for setting fixed direct debits (at a set amount each month); and
- Returning of customer credit that has accrued on the customer account.

1.10 In developing the guidance, we reviewed best practice examples in the delivery of customer contact centre services, fixed direct debit setting and processes for the return of customer credit. This included Northern Ireland utilities and regulated industries across other jurisdictions. We also engaged with Northern Ireland consumer representative bodies on our proposed guidance to obtain their input and views as to whether it would address their identified issues. More recently, we have considered Ofgem’s (the energy regulator for Great Britain) September 2024 publication “Consumer Confidence: a step up in standards”³, which outlines their strategy and ambition to drive further improvements and cultural change in customer service for both domestic and non-domestic consumers.

1.11 On publication of our September 2023 guidance, we committed to the development of a consultation on mandatory requirements to strengthen our regulatory framework. The aim of this was to improve the standards of service provided by energy suppliers for all consumers over the longer term, including those in vulnerable circumstances. The consultation was published on 25 March 2024.

1.12 This paper addresses the responses we have received to our proposals for mandatory requirements in relation to energy supplier customer service levels and outlines our decisions that will be implemented through a new CoP and licence modifications.

Consultation process to date

1.13 The proposals for mandatory requirements, set out for consultation, have been based on the original Guidance Note⁴ published in September 2023 and further developed taking into consideration the feedback from suppliers, consumer representative bodies and lessons from other jurisdictions.

1.14 After issuing the Guidance Note in September 2023, we held a series of meetings with individual suppliers. The purpose of these meetings was to establish with suppliers if there were any gaps in their existing processes, how they planned to align with the guidance, or if they considered that

³ [Ofgem, Consumer Confidence: a step up in standards](#)

⁴ [Guidance Note - Energy Supplier Customer Service Levels | Utility Regulator \(uregni.gov.uk\)](#)

there were fundamental issues with any of the requirements. We considered this feedback alongside other available information and updated several of the requirements in the Guidance Note accordingly to ensure what we were consulting on, and our decisions, are in the consumer interest.

- 1.15 In advance of publishing the consultation, we also reviewed the work Ofgem has undertaken in the area of improving consumer service standards. We have taken into account the proposals made by Ofgem and whether they would be appropriate in a Northern Ireland context, and where we consider they are relevant, included these for consultation. In developing our final decisions, we have also reviewed and considered, in the Northern Ireland context, the more recent Ofgem Consumer Confidence work which was published in September 2024.
- 1.16 During our engagement with consumer representative bodies, they have advocated that specific requirements and considerations should be set out for those consumers in vulnerable circumstances. Ofgem have also set specific mandatory requirements for this group of consumers in their new consumer standards requirements⁵.
- 1.17 Therefore we included mandatory requirements for consumers in vulnerable circumstances, which underpins the ethos of customer service standards for all consumers. These requirements are specifically in relation to customer contact centre services and complement the Best Practice Framework (BPF)⁶: CoP for Consumers in Vulnerable Circumstances and the updated definitions therein.
- 1.18 The overall aim of the BPF programme is to establish best practice principles and measures which utility suppliers and distribution network companies (DNOs) in Northern Ireland across electricity, gas and water must implement to better identify, support and protect consumers in vulnerable circumstances. The main delivery mechanism for this programme is via a new mandatory CoP for Consumers in Vulnerable Circumstances.
- 1.19 Through the CoP for Consumers in Vulnerable Circumstances, we have addressed the gaps and inconsistencies in the regulatory frameworks between DNOs and suppliers and across regulated sectors, in regard to the support and protections for consumers in vulnerable circumstances. The new CoP will also ensure that the support and protections offered to Northern Ireland consumers are consistent, adequately promoted, and

⁵ [Consumer standards decision | Ofgem](#)

⁶ [Best Practice Framework Consultation Proposals: Code of Practice for Consumers in Vulnerable Circumstances \(uregni.gov.uk\)](#)

reflective of best practice exemplars seen in Great Britain (GB) and across other jurisdictions and regulated sectors.

- 1.20 Our new CoP on Customer Service complements our BPF, with additional support for customers in vulnerable circumstances, to deliver improved service levels for all consumers.
- 1.21 On 25 March 2024 we published a Consultation paper on Energy Supplier Customer Service Levels. The Consultation paper outlined our proposed mandatory requirements for energy supplier domestic customer service levels across the following four areas:
- a) Consumers in vulnerable circumstances;
 - b) Customer contact centre services (this includes call centres and all mediums of written contact with consumers including social media platforms and emails);
 - c) Setting fixed direct debits (at a set amount each month); and
 - d) Returning of customer credit that has accrued on the customer account.
- 1.22 Overall, we received twelve responses to the consultation, with representations from industry and consumer bodies. Responses were received from:
- Bryson Energy
 - Marie Curie
 - Christians Against Poverty (CAP)
 - The Consumer Council for Northern Ireland (CCNI)
 - National Energy Action (NEA)
 - Advice NI
 - Northern Ireland Electricity Networks (NIEN)
 - Power NI
 - Click Energy
 - SSE
 - Firmus Energy

- Budget Energy.
- 1.23 We have used the consultation responses to inform our decisions on the new mandatory requirements for energy supplier customer service levels. As outlined in this paper, we are proposing that the requirements for consumers in vulnerable circumstances and customer contact centre services will be implemented through a new mandatory CoP and the requirements in relation to setting fixed direct debits and the return of customer credit will be implemented through new and/or amended licence conditions. This paper also outlines next steps in relation to how compliance with these requirements will be monitored and timelines for implementation.

Service Excellence

- 1.24 Our Corporate Strategy 2024 – 2029⁷ outlines our commitment to protecting Northern Ireland’s energy consumers. The Strategy emphasises that the companies we regulate should aim to be the best, raising the bar on the services they provide to consumers both in terms of customer service and consumer protection. Strategic objectives 3 and 4 of that Strategy outline our expectations around not only enabling best in class energy companies but also making sure the focus is on companies to provide the highest level of consumer service and protection.
- 1.25 Through our Strategy we outlined that we would ensure that the energy companies we regulate compared to the best by promoting best practice customer service and increasing our reporting of consumer protection performance metrics. By doing so, we expect the outcome to be an excellent customer service experience for consumers. The mandatory measures outlined in this Decision paper are the minimum standards that we would expect from licensees. We want licensees to be innovative, successful and responsive to their customer needs, whilst delivering the essential energy services needed by all consumers across Northern Ireland.
- 1.26 We expect all energy suppliers to continue to identify ways in which they can differentiate themselves in the market and deliver ever better standards of customer service performance beyond the mandated minimum requirements. For example, in March 2024 the British Standards Institute (BSI) launched a new Kitemark for Service Excellence, which is considered to be a mark of quality and distinction. Whilst we are not mandating obtaining the Kitemark at this juncture, the attainment of the benchmark may be one way in which a supplier may choose to

⁷ [Protecting Consumers on the way to Net Zero – Utility Regulator launches new Corporate Strategy 2024-2029 | Utility Regulator \(uregni.gov.uk\)](https://www.uregni.gov.uk/protecting-consumers-on-the-way-to-net-zero-utility-regulator-launches-new-corporate-strategy-2024-2029)

demonstrate how they are providing an effective customer service experience that meets and exceeds customers' expectations.

- 1.27 Our CoP on Customer Service provides a safety net of protection to ensure all consumers can obtain a good standard of customer service from their energy provider. We see this CoP as our starting point for customer service excellence. We will keep supplier performance and our related measures under ongoing review to ensure that they meet consumer needs and deliver the best outcomes.

Proposed key milestones

- 1.28 Alongside this Decision paper, we have published statutory consultation notices detailing the proposed modifications required to energy supply licences to enact our decisions. These notices will introduce the new licence condition for the CoP on Customer Service and also stipulate the proposed licence modifications in relation to setting fixed direct debits and return of credit.
- 1.29 The consultation notices will allow for the statutory 28-day consultation period. Following consideration of consultation responses, we intend to publish our final licence modification decisions in January 2025, with the new modifications taking effect by April 2025. Once the licence conditions are implemented, we expect licensees to be compliant with the new conditions and all the requirements within it (this includes the new CoP).
- 1.30 The proposed key milestones for the implementation of the new CoP and licence modifications are set out in the table below.

Table 1: Key milestones for implementation

| Milestone | Proposed Date |
|---|----------------------|
| Publication of Decision paper on Energy Supplier Customer Service Levels | November 2024 |
| Publication of the statutory consultation notice on the proposed licence conditions and amendments | November 2024 |
| Final decision on licence notification published | January 2025 |
| Licence conditions and CoP in force | April 2025 |

Structure of the paper

- 1.31 This paper will go through the key areas where we sought responses from stakeholders in the Consultation paper. We have outlined the responses received, our comments on each and our final decisions.

- 1.32 For transparency, we have summarised the responses to the Consultation paper and our comments in the applicable sections of this paper. It is not possible to detail every comment and respond to each one individually. As a result, we have included those comments that are most significant or opinions that have been shared by several respondents.
- 1.33 We thank all our stakeholders for their engagement throughout the development of the CoP and proposed licence modifications. We received a large amount of written and verbal feedback during this process and have considered all responses while reaching our decisions.
- 1.34 This paper contains the following Sections:
- **Section 2:** provides a summary of the responses, our comments and decisions on all consultation measures.
 - **Section 3:** provides a summary of the responses, our comments and decisions for monitoring and reporting of the mandatory requirements set out in the paper.
 - **Section 4:** details our timelines for implementation of the decisions set out in the paper.
 - **Section 5:** sets out the proposed licence modifications to implement the proposals into the respective licences.
 - **Section 6:** details our next steps.
 - **Appendix 1:** contains the final version of the CoP on Customer Service.

Equality considerations

- 1.35 Section 75 of the Northern Ireland Act 1998 places obligations on public authorities concerning the promotion of equality of opportunity and having regard to the desirability of promoting good relations between different categories. We aim to promote equality of opportunity:
- between persons of different religious belief, political opinion, racial group, age, marital status, or sexual orientation;
 - between men and women generally;
 - between persons with a disability and persons without; and
 - between persons with dependants and persons without.
- 1.36 In the Consultation paper we asked respondents if they agreed that where

the paper had an impact on the groups listed, those impacts are likely to be positive in relation to equality of opportunity for utility consumers. Those who responded stated it was their view that the groups listed are likely to be positively impacted by the proposals in terms of equality of opportunity. A consumer body highlighted that the principle of greater consideration for individual circumstances will support the effective implementation of the proposals. One supplier highlighted that if the proposals are implemented correctly and over a reasonable timeframe, they would allow for natural competition and growth and result in a better service for everyone.

- 1.37 We have undertaken a Section 75 screening of the original proposals as set out in the Consultation paper and reviewed all responses as part of the development of this Decision paper. We consider that our CoP and licence modifications will help all consumers, and we do not anticipate any negative impact on any groups.

2. Consultation measures and decisions

- 2.1 In the Consultation paper we outlined a number of proposed measures covering four key areas:
- a) Consumers in vulnerable circumstances;
 - b) Customer contact centre services;
 - c) Setting fixed direct debits; and
 - d) Return of customer credit.
- 2.2 This section sets out each proposed measure, an overview of the responses received, our response, and decision on each required measure.

Consumers in vulnerable circumstances

Measure 1

Domestic consumers, in particular those in vulnerable circumstances must be able to easily identify a method of contacting their energy supplier that meets their needs. The effectiveness of these methods must be regularly reviewed by suppliers.

Stakeholder feedback

- 2.3 There was support for this measure across consumer bodies. The responses highlighted that providing a range of contact methods was welcomed, most notably the emphasis on ensuring communication channels remain accessible and the importance of alternative means of contact, especially for those who cannot access an online form or website. Several highlighted that contact methods provided must address consumers' specific needs such as visual or hearing impairment, communication difficulties and ability to understand written information.
- 2.4 Digital exclusion was raised by several consumer bodies. One stated that this is something they come across frequently and another highlighted that one in five people (18%) in Northern Ireland have no digital skills (c276,000 people), with rates of digital exclusion being much higher amongst those over 65 years of age, those without qualifications, and those with disabilities.
- 2.5 Several consumer bodies were supportive of the requirement for a review

process and welcomed the proposal which would encourage a process of continuous analysis and iteration to ensure that there are accessible methods of communication available that meet any consumer's additional needs.

- 2.6 One supplier highlighted that they currently aim to ensure that consumers in vulnerable circumstances can easily identify a method of contacting them and another supplier highlighted the five contact methods they currently have on offer for customers.
- 2.7 One supplier believed that there was no requirement for mandatory intervention as they firmly believed that this requirement was already being met by them. Several suppliers highlighted the range of contact methods already available to their customers.
- 2.8 A consumer body advocated for improved accessibility for consumers who speak English as a second language, stating that access to interpreting services and provision of documentation in other languages should be considered.
- 2.9 One supplier stated they would welcome further information from UR demonstrating the numbers of customers under each of these categories and the specific gaps that have been identified in methods of contact provided for each. In relation to webchat, the supplier stated that the costs and complexities to implement are an issue. One supplier highlighted GDPR implications of customer correspondence, especially in relation to those who are vulnerable.

UR Response

- 2.10 We welcome the broad support for providing a range of contact methods that are suitable and accessible for all consumers, but in particular those who are in vulnerable circumstances, digitally excluded, and those who require additional support. We welcome the support in relation to the regular review process, which we consider to be vitally important to ensure that the needs of all consumers are being met across all suppliers. This review process allows suppliers to maintain up-to-date systems which will meet the needs of all their consumers as we move towards net zero. As technology advances and energy providers move towards more 'self-serve' functionality, we need to ensure that those customers who are in vulnerable circumstances, digitally excluded or require additional support are not left behind and can receive the help and support they require.
- 2.11 The responses provided highlighted that providing a range of contact methods was welcomed, especially the emphasis on ensuring

communication channels remain accessible and the importance of alternative means of contact, especially for those who cannot access an online form or website. Several responses highlighted that contact methods provided must address consumers' specific needs such as visual or hearing impairment, communication difficulties and difficulties understanding written information.

- 2.12 We welcome the fact that some suppliers have highlighted that they are already fulfilling this requirement. This gives us confidence that this measure will result in a minimal barrier to implementation and satisfies concerns around potential undue regulatory burden.
- 2.13 We agree with the consumer body who advocated for improved accessibility for those consumers who speak English as a second language, and the provision of services such as interpretation and document translation. Through our BPF programme, we introduced a new definition of vulnerable or vulnerability into supply and DNO licences across electricity, gas and water. Licensees are required to apply this definition to all vulnerability and vulnerable requirements throughout their licence and Codes of Practice. The definition of vulnerable or vulnerability is as follows:
- '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'.*
- 2.14 Consumers with English as a second language may find that this reduces their ability to engage effectively with their supplier. Therefore any provisions which can be put in place to assist those who are vulnerable will also be beneficial to those customers with English as a second language.
- 2.15 One supplier highlighted that they would welcome further information from us demonstrating the numbers of customers under each of the categories in the Consultation paper and the specific gaps that have been identified in methods of contact provided for each. Although this is not information we currently hold across all suppliers, we would note that the number of customers is not a critical factor underlying the need for this measure. It is vital that all customers have the ability to effectively communicate with their supplier and it is important that the needs of all customers are met. The metrics for this could be collected from each supplier going forward to ascertain the numbers in each category if deemed necessary.
- 2.16 GDPR implications were raised by one supplier in relation to customer

correspondence. This was specifically in relation to how the correspondence for those who are vulnerable is managed. This has already been considered by the Information Commissioner's Office (ICO) as part of the BPF: CoP for Consumers in Vulnerable Circumstances.

UR decision

2.17 Measure unamended

Measure 2

Suppliers must have processes in place to identify and prioritise enquiries from domestic consumers in vulnerable circumstances who may require immediate assistance, or representatives acting on their behalf and in their interest. This should include adequate training to ensure these processes are being followed sufficiently (discussed under measure 6 in customer contact centre services).

Stakeholder feedback

- 2.18 There was support for this measure across a number of consumer bodies. The responses provided included two consumer bodies welcoming the specific reference to training, highlighting that suppliers need to properly train staff to recognise issues and make services more accessible.
- 2.19 One supplier has begun to adopt this approach already with an internal drive to enhance customer support and have a dedicated team in place.
- 2.20 Some other suppliers highlighted that they could foresee many challenges in developing and implementing a system to identify and arrange enquiries from consumers in vulnerable circumstances. One of these suppliers highlighted that a dedicated separate phone line would not be practical and could create a two-tier system for customers, which was a sentiment shared by other suppliers who said it could lead to negative customer experiences. The same supplier was concerned that this system could be accessed by customers who were not entitled to use it. Another supplier did not support the selective nature of this requirement and said it would involve profiling of customers before any engagement.
- 2.21 One supplier highlighted that they have purposely chosen not to have an Interactive Voice Response (IVR) as they do not believe that a triage system is required and, if forced to implement, they were of the view that it may have an overall negative impact on their current customer service levels.

UR Response

- 2.22 We consider this proposal to be proportionate and in keeping with the principles and requirements of the CoP for Consumers in Vulnerable Circumstances with regard to the identification of vulnerability. For clarity, the only additional aspect which this measure places on suppliers is around the prioritisation of enquiries.
- 2.23 Principle 1 of the CoP for Consumers in Vulnerable Circumstances states that utility suppliers and DNOs will proactively establish and promote a corporate culture that focuses and fosters their efforts to identify and support consumers in vulnerable circumstances. Within this principle, it states that all companies are to adopt UR's vulnerability/vulnerable definition⁸ and all companies should have a specialist vulnerability team or person (depending upon the size of the business) to champion innovative strategies for the treatment of consumers displaying signs of vulnerability (including the use of inclusive design principles)⁹.
- 2.24 Principle 2 of the CoP for Consumers in Vulnerable Circumstances states that consumers in vulnerable circumstances will experience tailored support and positive outcomes when interacting with utility suppliers and DNOs. Within this principle it states that all relevant staff (e.g. consumer facing staff, field staff, call centre handlers, and sub-contractors), including staff at a senior level, are adequately and frequently trained in the identification of consumers in vulnerable circumstances and/or who may be eligible for the customer care register (CCR) , 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 training¹⁰.
- 2.25 Principle 3 of the CoP for Consumers in Vulnerable Circumstances states that 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. Within this principle it states that a CCR should be established, maintained and updated in a timely manner following receipt of data from suppliers and/or DNOs¹¹. It also highlights that CCRs must be actively promoted (to encourage greater identification and sign up of eligible customers)¹².

⁸ Consumers in vulnerable circumstances Measure 1

⁹ Consumers in vulnerable circumstances Measure 3

¹⁰ Customer contact centre services Measure 1

¹¹ Setting fixed direct debits Measure 2

¹² Setting fixed direct debits Measure 4

- 2.26 We understand that some suppliers have reservations over identifying vulnerable customers, especially if a customer does not self-identify. There are concerns around assigning an incorrect category of vulnerability or recording information to which a customer has not consented. We consider that these issues have been addressed in the Decision paper for the CoP for Consumers in Vulnerable Circumstances. We believe that the systems and processes suppliers will have in place for the CoP for Consumers in Vulnerable Circumstances will assist in their delivery of this measure.

UR decision

- 2.27 Measure unamended

Measure 3

Suppliers must implement appropriate processes/services to provide a freephone telephone number for domestic consumers that are in vulnerable circumstances. Eligible customers must be made aware of and directed to free methods of contact as soon as their supplier is aware of their eligibility.

Stakeholder feedback

- 2.28 This proposal received mixed responses, with both positive and negative feedback. Consumer representative bodies were fully supportive of this measure, with the majority highlighting that they would like to see further measures in place such as freephone for those acting on behalf of or representing vulnerable customers, or a freephone number for all consumers. It is noted that several suppliers already provide this service with a freephone number for all their customers.
- 2.29 Some suppliers highlighted that given the expanded definition of this category of consumers, any management of this as a separate option would be impossible, therefore the practical solution would be to move all customer service calls to a freephone number, which comes at a cost. A second supplier commented that they saw no practical way of delivering a freephone number for vulnerable customers, with a third stating that UR are in effect mandating that all supplier telephone numbers must be freephone.
- 2.30 One consumer representative body highlighted that customer service levels could be improved for vulnerable customers who are in debt.
- 2.31 One consumer representative body highlighted that customers may shy

away from using the freephone number for customers in vulnerable circumstances for a number for reasons including shame, embarrassment or denial. They suggested that the simple and accessible approach would be to make phone lines free for all customers in order to better support those in financial difficulty.

UR Response

- 2.32 We have considered our proposal in response to feedback from all respondents. We have noted that consumer representative bodies are fully supportive of this measure with the majority highlighting that further measures were required.
- 2.33 We have noted suppliers' comments and concerns around both the cost implications and the management of a freephone number for those in vulnerable circumstances (with one supplier stating this would be impossible and another highlighting that they saw no practical way of delivering a freephone number for vulnerable customers). We appreciate the reservations of suppliers around the identification of vulnerable customers (especially if customers do not self-identify). However, as per Measure 2 above, there are already requirements on suppliers to identify customers in vulnerable circumstances within the CoP for Consumers in Vulnerable Circumstances.
- 2.34 As a result, we have now amended this measure to require that only those consumers on the CCR, or their nominated representatives, will be given access to the free telephone number. We are also requiring that those in debt or financial difficulty are given access to a low cost number. This is a reasonable adjustment to our original proposal to take account of the feedback received, while also ensuring that affordable and practical methods of contact are available for vulnerable customers and those suffering financial hardship.
- 2.35 The benefit of restricting the freephone number to those on the CCRs is that individuals on the CCR will be recorded on a database which will be subject to review and amendment every two years (at minimum). Currently all suppliers hold and maintain their own CCRs. Through the BPF programme, changes to the CCR structure will be implemented with the longer-term aim of moving to a single cross-utility CCR.
- 2.36 The CoP for Consumers in Vulnerable Circumstances places a requirement on companies under Principle 2 where all companies are to remove call duration targets for vulnerability and affordability themed calls. Allocating separate numbers to these customer categories, should make it easier for contact centres to remove targets from these telephone numbers and will aid monitoring.

- 2.37 We appreciate that some suppliers already exceed this requirement and provide a freephone number for all customers, which is encouraging. A supplier may wish to extend the use of a freephone number to all customers at their own discretion.
- 2.38 By providing a freephone number for those on the CCR and a local (low cost) number for those customers in financial difficulty, suppliers will be providing an extra level of service to the most vulnerable in our society. We note that none of the suppliers who responded to our initial proposal included indicative costs relating to the provision of a freephone number. However, we are aware that the proportion of customers on the CCR and in debt are relatively small in comparison to the overall customer base. Therefore, we do not consider that this requirement will place an undue financial burden on energy suppliers.
- 2.39 We will keep this requirement under review, and should further evidence of need become clear, we may revert to our original proposal of a freephone number for all customers in vulnerable circumstances.

UR decision

- 2.40 Measure amended

Measure 3 - Suppliers must implement appropriate processes/services to provide a freephone telephone number for domestic consumers that are on the Customer Care Register (CCR) and a local (low cost) phone number for those domestic customers who are experiencing financial difficulty. Eligible customers must be made aware of and directed to a suitable method of contact as soon as their supplier is aware of their eligibility.

Customer contact centre services

Measure 1

At an overall level, suppliers must ensure they have and maintain robust internal capability, systems and processes to enable them to adequately deliver their customer contact centre services.

Stakeholder feedback

- 2.41 All stakeholders agreed with this measure. Consumer bodies in particular welcomed its inclusion. One consumer representative body highlighted that customer contact centre services are a “basic operational activity” and therefore “no supplier should fail to maintain adequate levels of customer service centre delivery.”
- 2.42 Suppliers acknowledged that customer contact services are essential in their delivery of customer services; therefore, many stated that this measure is already being met. However, some highlighted their concerns in relation to placing too much focus on contact centre service Key Performance Indicators (KPIs) and that effective customer service requires consideration of a multitude of factors.

UR Response

- 2.43 Our view has not changed. We believe that it is essential that suppliers provide customer contact services that work for consumers to ensure adequate levels of provision. In order to achieve this aim, it is vital that suppliers’ systems and processes are fit for purpose and able to deliver their services, including during periods of high customer demand.
- 2.44 Furthermore, to embed the principles contained in our CoP for Consumers in Vulnerable Circumstances, we expect that those systems and processes take into account the needs of consumers in vulnerable circumstances. This includes consideration of how systems and processes in contact centres meet requirements for providing tailored support and positive outcomes for consumers in vulnerable circumstances (Principle 2). Consideration of other BPF principles must be included as well, such as (but not limited to): recording of needs in the most appropriate way, enabling access to the most relevant support (Principle 4); providing relevant, timely and accessible information on the support available (Principle 6); providing targeted support to those consumers in vulnerable circumstances, as a result of affordability difficulties (Principle 7); and providing consistency and improved ease of access to the support

provided through the cross-industry sharing of relevant data (Principle 8).

- 2.45 We are aware of rising complaints amongst consumers that supplier contact information is difficult to find at times. If consumers cannot easily locate their supplier's customer contact telephone number (or alternative contact methods), this is a barrier to contacting their suppliers, leading to inadequate service levels and poor outcomes for consumers.
- 2.46 Suppliers must be mindful that if this measure is not being met, suppliers may also not be meeting obligations to comply with other CoPs in licences, such as (but not limited to) CoP minimum standards on Payment of Bills and CoP minimum standards on Complaints Handling Procedure.

UR decision

- 2.47 Measure unamended

Measure 2

Customers must be able to easily identify methods of contacting their suppliers.

Stakeholder feedback

- 2.48 All stakeholders were in agreement with the underlying principle of this new measure. Furthermore, one consumer representative body highlighted the importance of using a professional, fair, helpful and empathetic tone when suppliers engage with their customers. Another stated that a "straightforward point of contact and easily accessible information is of critical importance to families faced with a terminal illness diagnosis."
- 2.49 Suppliers responded that their contact information is always prominently displayed to ensure ease of identification. One supplier asserted that in line with ISO 22458¹³, it must ensure that information for customers is easy to access and readily available which includes contact details.

UR Response

- 2.50 It is essential that customers can easily identify how to contact their energy supplier. We are encouraged to see that suppliers that responded to this measure do not see an issue in implementing it and many already seem to be meeting this requirement. As highlighted in the consultation

¹³ [Consumer vulnerability – Requirements and guidelines for the design and delivery of inclusive service](#)

and in consumers in vulnerable circumstances Measure 1, we expect that the needs of consumers in vulnerable circumstances, including customers on the CCR, are considered when ensuring that enquiry service information is easy to find.

- 2.51 Suppliers should also seek feedback from customers on methods of contact available to ensure that they are continuing to meet the needs of their customers.

UR decision

- 2.52 Measure unamended

Measure 3

Suppliers must ensure customer contact centre services are open at times that meet the needs of their domestic customers.

Stakeholder feedback

- 2.53 There were mixed responses in relation to this new measure. Consumer bodies were in favour of the measure with one body stating that a standard 9am-5pm, Monday-Friday does not cater for customers who work those same hours and may find it difficult to make calls during this time. Furthermore, those standard hours do not take into account seasonal changes as more calls are made during the colder autumn and winter months.
- 2.54 However, some suppliers asserted that customer needs are being met with current opening hours as there is no evidence to prove otherwise. Additionally, one supplier stated it has experienced no issues in relation to the quality of customer service and believed the value of opening an additional number of hours each week would be of little benefit compared to the costs incurred to operate additional hours. One supplier had the view that this requirement is interfering with an otherwise competitive market.
- 2.55 Nevertheless, one supplier acknowledged that it may be challenging for some customers to contact their supplier during standard business hours and welcomed the new measure.

UR Response

- 2.56 Consumers must have the ability to contact their supplier through their preferred channel of communication, and at times which are appropriate for them. We are aware of rising issues in relation to customers not being

able to contact their suppliers at times that are reasonable – this is especially the case during holidays. We have evidence that some suppliers have been reducing their hours and/or closing over a long period, which leaves them unable to meet the needs of their customers.

2.57 We have taken a balanced approach in relation to this measure – although we agree in principle that some customers may find it difficult to call their suppliers during traditional working hours (9am-5pm, Monday-Friday), we see evidence of varying opening hours of some suppliers and we are satisfied, at the moment, that the market is adjusting itself appropriately. Furthermore, we are content to rely on suppliers to determine the opening hours that suit the needs of customers, as long as they provide evidence of review and monitoring if issues then arise (including periods of high customer demand).

2.58 As a result, we do not want to be overly prescriptive in relation to opening hours at this time. However, if we observe changes to suppliers' opening hours that we feel are unreasonable and/or not meeting the needs of customers, this position may change. For instance, if we observe unreasonable length of closure during certain periods of the year (such as around bank holidays), this may indicate to us that suppliers are not applying this measure in a reasonable manner.

UR decision

2.59 Measure unamended

Measure 4

Consumers must be able to reach their supplier's customer contact centre easily without experiencing an excessive call wait time to speak to an operative (not over an average wait time of four minutes).

Stakeholder feedback

2.60 There were mixed responses in relation to this measure. There was support from consumer bodies with one body highlighting the need for shorter wait times as "long wait times on calls can act as a barrier and add to what may already be a stressful situation." The same body also stated that their organisation recorded just under seven hundred call waiting enquiries and complaints from both electricity and gas customers from April 2021 to date. A separate consumer body was of the view that even with this measure, customers may still experience excessive call wait times as the measure prescribes an average wait time rather than a definitive time and their response encouraged the application of a

definitive time instead.

- 2.61 There was ambivalence from suppliers in supporting this measure as an average call answer time within four minutes does not necessarily mean a positive outcome for the customer in terms of satisfaction. Some suppliers believed the time was too prescriptive and does not consider individual call circumstances and urged us to allow flexibility given that there are factors beyond the control of suppliers when taking calls. One supplier stated that more details are required on the metric that will be used to determine compliance with this measure.
- 2.62 However, one supplier acknowledged that this measure has potential benefits for the consumer and believed it could be effectively implemented.

UR Response

- 2.63 As suppliers will be aware, we have been collecting data on Customer Service KPIs since November 2022. Our Guidance Note for domestic energy suppliers, published in September 2023, set out our expectations on customer service levels. Since we published that Guidance Note and have been monitoring performance, we have been working closely with suppliers to communicate our expectations and standards in relation to certain submitted KPIs.
- 2.64 As a result of this work, and based on the evidence gathered to date, we believe that an average call wait time of four minutes is both reasonable and achievable for all suppliers.
- 2.65 We have a comparable baseline when setting this measure, as call waiting times for broadband and landline providers are just under 2.5 minutes¹⁴. Furthermore, Ofgem highlighted in their recently published “Consumer Confidence: a step up in standards” document that, “since 2022 we have seen the industry average call waiting time improve from 7 minutes to around 2 minutes (so far in 2024).” We have written to all suppliers and provided a clear definition of call wait time that will be used to determine compliance.

UR decision

- 2.66 Measure unamended

Measure 5

¹⁴ [Comparing customer service: mobile, landline and home broadband \(Ofcom.org.uk\)](https://www.ofcom.gov.uk/consult/condocs/customer/customer230923.pdf)

Suppliers to implement a triage system for all calls.

Stakeholder feedback

- 2.67 There was broad support from consumer bodies for this measure. One body welcomed this measure which is “utilised as a key indicator of quality by advice services, especially with regard to the identification of vulnerabilities.” Another body also highlighted that prioritising calls “would give assurances that those domestic customers identified as being in vulnerable circumstances, or in need of additional support, are being given the right help and guidance at the right time.”
- 2.68 Although consumer bodies welcomed this measure, there was widespread concern from suppliers on this proposal. For instance, some suppliers stated that it would be difficult to implement (even with using IVR) and would place a significant burden on suppliers if required. One supplier believed that a triage system is simply not needed.
- 2.69 Some suppliers requested that we provide guidance around the implementation of this measure. One supplier suggested that triage should be based around the reason rather the personal circumstances of a caller.

UR Response

- 2.70 During our engagement with consumer bodies and suppliers during the consultation process, we became aware that several suppliers already employ methods to identify and prioritise customers that need urgent contact, especially those consumers in vulnerable circumstances. Additionally, we see a desire from consumer representative bodies to add this measure. Although we strongly believe in the principles of this measure, following assessment of the consultation responses, we have decided not to mandate this requirement at this time and allow an opportunity for suppliers to implement its principles without being prescriptive.
- 2.71 We believe that the ability to prioritise calls under Measure 2 will provide assurances that those customers in vulnerable circumstances, or in need of additional support, are being given the right support at the right time, especially during extraordinary events outside of the supplier’s control. However, we note that with the effective implementation of both the CoP for Consumers in Vulnerable Circumstances, and the other requirements in the CoP on Customer Service, suppliers should be adequately and effectively meeting the needs of vulnerable consumers.

- 2.72 Therefore, suppliers must take into consideration those principles and associated measures in the CoP for Consumers in Vulnerable Circumstances when reviewing their systems/processes and training procedures.
- 2.73 We will closely monitor supplier behaviour and review how their training and systems/processes take into consideration those customers in vulnerable circumstances. As a result of this monitoring we will retain the option to introduce more prescriptive measures if deemed necessary.

UR decision

- 2.74 Measure removed

Measure 6

Customer contact centre operatives must be adequately trained to ensure they can provide accurate and consistent information to consumers.

Stakeholder feedback

- 2.75 There was unanimous support from consumer bodies and suppliers in relation to the principles behind this measure. However, some suppliers believed this activity should not be mandated as it is already common practice and therefore there is no need to incorporate it into a CoP.

UR Response

- 2.76 We are pleased that all those that responded to the consultation were in agreement with this measure and that it is already being implemented by many suppliers in their respective businesses. However, we want to make it very clear to suppliers what we expect in relation to the standards of that training and what it should entail.
- 2.77 It is the responsibility of each supplier to ensure that their staff are adequately trained to ensure all aspects and appropriate levels of service are provided to the consumer. However, the new CoP will detail what we expect suppliers to include in their training programmes at a bare minimum.
- 2.78 In addition to the new CoP, we expect that suppliers take into account the training requirements for staff that are included in the BPF: CoP for Consumers in Vulnerable Circumstances to ensure those customers' needs are being met. This includes consideration of how staff training will ensure effective delivery of providing tailored support and positive outcomes for consumers in vulnerable circumstances (Principle 2).

Consideration of other BPF principles must be included in staff training as well such as (but not limited to): recording of needs in the most appropriate way, enabling access to the most relevant support (Principle 4); providing relevant, timely and accessible information on the support available (Principle 6); providing targeted support to those consumers in vulnerable circumstances, as a result of affordability difficulties (Principle 7); and providing consistency and improved ease of access to the support provided through the cross-industry sharing of relevant data (Principle 8).

UR decision

2.79 Measure unamended

Measure 7

Call back services must be offered by all suppliers and acted upon in no more than 24 hours¹⁵.

Stakeholder feedback

- 2.80 There was widespread agreement from consumer bodies to implement this measure. One body called for “specific targets to include dispensation for cases where greater time would allow the supplier to provide effective and meaningful support in the first instance.”
- 2.81 Suppliers, on the other hand, had some concerns in relation to this measure. Many suppliers stated that this measure is simply too rigid and will be costly to implement and maintain.

UR Response

- 2.82 We believe that a call back service is a valuable service for consumers. Its use may reduce long waiting times, especially during times of high call volume and provide the opportunity for a customer to be contacted at a time that is convenient for them. It also allows for effective engagement with customers in vulnerable circumstances who may be easily identified via the information they disclose during the request for a call back. The call back service may also act as a natural triage system for those customers who are willing to wait for a response and therefore assist in times of increased customer call volumes and system stress. It may also reduce levels of call abandonment and assist in achieving required call wait time targets.

¹⁵ Taking account of supplier customer contact centre opening hours.

- 2.83 However, based on consultation responses and further analysis, we have amended the measure to allow flexibility (with longer timelines to execute), with a call back to be provided within two working days instead of 24 hours.

UR decision

- 2.84 Measure amended

Measure 7 - Call back services must be offered by all suppliers and acted upon within two working days¹⁶.

Measure 8

Suppliers must ensure that their call abandonment rate is not excessive (not above 12.5%).

Stakeholder feedback

- 2.85 There was broad support from consumer bodies on this measure. One body recommended this measure include proposals that a professional, fair, helpful and empathic tone should be used when suppliers engage with customers.
- 2.86 However, there were many concerns from suppliers relating to this measure. Some suppliers expressed concerns that the measure is overly prescriptive. Other suppliers stated that this would be too costly to operate. One supplier believed that this metric should be measured over a quarterly period to account for “unforeseen system issues or other short-term factors that may temporarily impact call abandonment rates.”

UR Response

- 2.87 We believe that an abandonment rate not above 12.5% is achievable for all suppliers, as evidenced in the customer service metric data collected from suppliers since October 2023.
- 2.88 Lower call abandonment rates not only help to minimise customer frustration and dissatisfaction, but also help to ensure that customers get the help they need quickly and effectively. This not only helps address customer issues, but also helps to ensure those customers in vulnerable circumstances or in distress are dealt with in a timely manner. By

¹⁶ Taking account of supplier customer contact centre opening hours.

engaging with customers at their first attempt at contact, issues may be resolved earlier with less opportunity for escalation.

- 2.89 Furthermore, we believe we have comparable baselines when setting this measure. For instance, call abandonment rates for Northern Ireland Water¹⁷, who provide a supply to all households within Northern Ireland, achieved a rate of just under 5% for 2021/22. Additionally, the Commission for Regulation of Utilities (CRU), set their call abandonment rates for their Transmission System Operator and DNO at 4% since 2021¹⁸. We appreciate that there may be clarification sought on the details and definition of abandonment rate and how this data should be collected. Based on engagement with suppliers and feedback from them, we provided a clear definition that will be used to determine compliance.

UR decision

- 2.90 Measure unamended

Measure 9

A customer's call must never be disconnected when they contact their supplier during their customer contact centre operating hours (apart from circumstances outside of the supplier's control).

Stakeholder feedback

- 2.91 There was unanimous support from stakeholders regarding this measure. Furthermore, one consumer body believes that "recorded calls provide a record of all the interactions between the customer and the advisor and play an important part of the audit trail."
- 2.92 All suppliers agreed with the principle behind this measure and stated that this is already in practice; they would never intentionally disconnect a call with a customer. Some suppliers stated that a call would only be disconnected if a customer was abusive and only after receiving several warnings from the customer service representative.

UR Response

- 2.93 We are pleased that stakeholders vastly agree with this measure. We appreciate the views of some suppliers that this does not need to be mandated in a CoP, as this is already an established practice. However,

¹⁷ See Northern Ireland Water's latest figures in their [Annual Information Return 2022 for Public Domain](#), Block C, Table 5.

¹⁸ CRU's Regulatory Framework, Incentives and Reporting Decision Paper ([CRU/154](#)).

we want to make our expectations clear to all energy suppliers (and any new suppliers entering the market), as well as provide clarity to consumers in relation to the standards we require.

- 2.94 Supplier responses to the consultation strongly indicate that this measure will not be difficult for suppliers to deliver. The consumer benefit is also clear with a definite commitment from all suppliers that they will never intentionally drop a call.

UR decision

- 2.95 Measure unamended

Measure 10

Written customer contacts (all mediums of written contact with consumers including webchat, social media platforms and emails) must receive timely responses within a maximum of 24 hours¹⁹.

Stakeholder feedback

- 2.96 Consumer bodies were broadly supportive of this measure and welcomed the intentions. One body called for additional details to this measure such as ensuring that consumers receive more than just a generic reply, and that response should be sent within a maximum of 24 hours. Another body stated that any automated message (sent within 24 hours of first contact) should clearly state when the supplier will be in touch with the customer.
- 2.97 Some suppliers believed this was overly prescriptive and worried about the effect that it may have on the investigation process for suppliers' agents when resolving an issue. For example, a query could receive a hastened response without proper investigation due to a mandated deadline to respond. One supplier urged that this measure only apply to digital means of communication.
- 2.98 One supplier stated it currently acknowledges any email from a customer with an automatic confirmation which provides an indication of when they are likely to receive a response and that responses to emails are usually delivered on average within two working days.

UR Response

- 2.99 Irrespective of their method of contact, it is important that all consumers

¹⁹ Taking account of supplier customer contact centre opening hours.

receive a response in a prompt and timely manner, and through a method that suits their individual need. It is therefore necessary that all written customer contacts are treated in a similar manner and timeframe to those contacts made by telephone. This helps to ensure both a parity in service and equitable treatment of all consumers.

- 2.100 Following consideration of the consultation responses, and our own internal analysis, we have amended the measure to allow flexibility and extended timelines to execute. We have also aligned the measure to mirror the timelines as required for the call back service and require that all written customer contacts are responded to within a maximum of two working days.
- 2.101 We believe the amended measure is achievable by all suppliers and that the two working days response time will ensure that all customer contacts are dealt with in a timely manner. This is after feedback from consumer bodies that felt that five working days for a response to a complaint (as mandated in our CoP on Complaints Handling) was too long. However, we believe that the amended measure will still provide great benefit to the consumer as timelines for a response are clear and not subject to discretion. The objective of this measure is that any written contact received by suppliers is responded to within two working days. Where a written contact falls within the definition of a complaint under the supplier's Code for Complaints Handling, the CoP Standards on Complaints Handling Procedure will apply. We will continue to monitor suppliers' activities and response times under both CoPs and if there are any issues, may make recommendations for changes to response times if there is supporting evidence to deem it necessary.
- 2.102 We agree with consumer bodies that an automatic receipt to customers should be provided, and this must include an indication of timelines for a fuller response. This will also ensure that when further investigations are required to resolve a query, a holding response to the customer will be provided. This then will allow reasonable time for suppliers to undertake a thorough analysis to resolve the issue and provide that to the customer when completed.
- 2.103 We agree with suppliers that this timeframe should not extend to written contact in non-digital format and have specified this in the CoP. However, whilst we do not expect customers to have received replies to postal responses within two working days, we do expect suppliers to have sent a reply within two working days from receipt of written correspondence from customers.

UR decision

2.104 Measure amended

Measure 10 - Written customer contacts (all mediums of written contact with consumers including webchat, social media platforms and emails but excludes postal correspondence) must receive timely responses within a maximum of two working days²⁰.

Measure 11

Suppliers must implement a triage system for written contacts.

Stakeholder feedback

- 2.105 Consumer bodies were widely supportive of the principles of this measure. One supplier welcomed the intent of the measure to prioritise urgent inquiries to ensure that customers receive appropriate support in a timely manner. However, several suppliers had major concerns in relation to the implementation of this measure.
- 2.106 Many suppliers asked for guidelines in relation to how we envisage this measure to be implemented. One supplier stated that there is no need to implement this measure as there is no evidence to suggest that suppliers are underperforming/failing to service their customers in this regard. One supplier asserted that this is an operational matter, and it should be left up to each individual supplier on how to best manage its customer contacts.

UR Response

- 2.107 It is evident through the consultation responses that consumer representative bodies are in support of this measure while suppliers did not consider it to be necessary.
- 2.108 The ability to triage written responses may give assurances that those customers in vulnerable circumstances, or in need of additional support, are being given the right support at the right time, especially during periods of increased customer contact. However, as is the case with our decision on the triage system for calls, we note that with the effective implementation of both the CoP for Consumers in Vulnerable Circumstances, and the other requirements in the CoP on Customer Service, suppliers should be adequately and effectively meeting the needs of vulnerable consumers.

²⁰ Taking account of supplier customer contact centre opening hours.

- 2.109 We will closely monitor supplier behaviour and review how their training and systems/processes take into consideration those customers in vulnerable circumstances. This includes monitoring of supplier compliance with the CoP for Consumers in Vulnerable Circumstances. We will retain the option to introduce more prescriptive measures if deemed necessary.

UR decision

- 2.110 Measure removed.

Setting fixed direct debits

Measure 1

Suppliers must take all reasonable steps to ensure that when setting the fixed direct debit for a new customer, it is based on the best and most accurate usage information: the fixed direct debit value must be calculated specific to the individual customer and based on up-to-date and accurate information.

For new customers, payments must be based on a number of factors, which includes information provided by the customer. This must, as a minimum, include the following:

- i. Up to date meter reading;
- ii. Size of the property;
- iii. How many people live at the property; and
- iv. Take account of any other relevant information provided by the customer.

Stakeholder feedback

- 2.111 There was broad support across industry and consumer bodies for implementing this measure. Numerous consumer bodies believed the proposal will help address variations that exist across suppliers which will directly benefit all Northern Ireland energy consumers, particularly those in vulnerable circumstances.
- 2.112 Several suppliers stated that their existing direct debit processes already align with this requirement.
- 2.113 A supplier noted that the requirement to consider any other relevant information provided by the customer may present a number of challenges without the availability of smart meters. A supplier also raised concerns that any updates to current systems to include specific measures in direct debit calculation will require system development,

dedicated resources, time to implement and bring with it additional cost that will ultimately be borne by the customer.

- 2.114 Two suppliers noted that Actual Usage Factor (AUF)/Estimated Usage Factor (EUF)/Annual Quantity (AQ) are used alongside actual meter reads when determining direct debit amounts and believed this method could provide a useful and consistent tool that could be adopted by all suppliers. It was acknowledged that in cases of change of tenancy or changes to personal circumstances it may take time for the AUF/EUF/AQ to reflect these variations, but suppliers stated they will engage with customers at an individual level to ensure payments are reflective of usage and are achievable.
- 2.115 A consumer body stated that financial circumstances of the customer must also be factored into the calculations when setting fixed direct debits. A consumer body also noted a requirement for energy companies to alert vulnerable customers to the availability of cheaper payment methods and tariffs should be a priority.

UR Response

- 2.116 We welcome the broad support for introducing the measure which aims to ensure that fixed direct debit values are calculated in a consistent manner, specific to individual customers and based on up-to-date and accurate information.
- 2.117 We are encouraged to see that several suppliers stated that their existing direct debit processes already align with this requirement. We acknowledge concerns raised with regard to current system updates to include specific measures in direct debit calculation. However, we believe that the minimum requirements listed are essential in ensuring fixed direct debit values are accurately calculated and suppliers should therefore adapt their current processes to include these requirements. In addition, supplier processes should be documented so that there is a consistent approach with all new customers.
- 2.118 We recognise that Northern Ireland does not currently have smart meters and there are limitations on the information that can be meaningfully used to set direct debit payments. However, we are of the view that relevant information on usage patterns should be taken into account as it will have an impact on the fixed direct debit amount. This is covered by the requirement to include taking account of relevant information provided by the customer.
- 2.119 The requirements listed are the minimum we expect from suppliers. However, suppliers are free to consider other types of information, such

as AUF/EUF/AQ when setting fixed direct debits.

- 2.120 We recognise the importance of considering the financial circumstances of customers. Any customers having difficulty or at risk of having difficulty paying their bills can communicate with their supplier, and such cases will be assessed on an individual basis. As stipulated in the CoP on Payment of Bills, suppliers are required to proactively seek to identify and communicate with customers in financial difficulty, offer early intervention to prevent debt building up and ensure debt repayment levels are based on ability to pay. The CoP for Consumers in Vulnerable Circumstances ensures that consumers in vulnerable circumstances as a result of affordability difficulties will be provided with targeted support by their utility supplier. We believe that these existing requirements offer protections to consumers, particularly those in vulnerable circumstances.
- 2.121 We welcome the suggestion to include a requirement for energy companies to alert vulnerable customers to the availability of cheaper payment methods and tariffs. We note that the existing CoP on Domestic Bills and Statements stipulates that suppliers will highlight to the customer that there may be cheaper tariff options available and provide details of how to speak to an advisor to find out if they are on the best deal for them. However, we acknowledge that further protections for vulnerable customers would be beneficial and have incorporated this requirement into consumers in vulnerable circumstances Measure 2 above to be reflected in the CoP on Customer Service.

UR decision

- 2.122 Measure unamended

Measure 2

For any fixed direct debit payment plan (new and amended), suppliers must provide clear and accessible information to the consumer on how this payment plan operates.

When signing up a customer to a fixed direct debit payment plan, the supplier must clearly explain how the fixed direct debit operates. This must be clearly articulated to the customer at the point of sign up (verbally if in person or via phone or written if online) and confirmed in writing by the customer's chosen method of contact. The supplier must include the following information (as a minimum):

- i. How the customer's fixed direct debit has been calculated;
- ii. That the fixed direct debit value can change over the course of the contract and that it will be reviewed at regular intervals (to ensure it is reflective of customers actual usage either lower or higher);
- iii. How and when the supplier will review the fixed direct debit;
- iv. How and when the customer can request a review of the fixed direct debit;
- v. How the customer can help improve the accuracy of the fixed direct debit e.g. by providing meter reads at regular intervals to ensure there is an accurate record of actual usage;
- vi. That a fixed direct debit payment plan can result in overall account credit or debit if the energy usage is different to that expected; and
- vii. What options the customer has if they accrue credit (to include how to request payment of their credit (see Return of Customer Credit Measure 1) and processes for discussing with the supplier any debt that has accrued on the account).

Stakeholder feedback

- 2.123 There was broad support across industry and consumer bodies for implementing this measure, to ensure customers are well-informed, can understand the supplier processes and to provide transparency on payment plans.
- 2.124 A consumer body noted that suppliers should request the customer to check that the first payment has been debited, to ensure the account has been set up correctly. Another consumer body advocated for procedures

to allow all consumers, especially those who are vulnerable, to approach the supplier on an ad hoc basis to review their payment plan and that discussions around payment plans are tailored to individual circumstances.

- 2.125 A number of suppliers stated that their existing direct debit processes already align with this requirement.
- 2.126 One supplier voiced their support for the proposal and stated that they were committed to enhancing the communication of payment plans. One supplier stated that it is standard practice to confirm set up of direct debit payment plans by letter and the content of these letters can be readily modified to incorporate the information proposed. They noted that the direct debit guarantee scheme stipulates that confirmation of direct debit must be sent to customers in writing and believe the process can be streamlined to ensure additional information relating to direct debits is communicated at the same time and in the same format. They also suggested that verbally explaining how the fixed direct debit operates should be approached on an individual call basis, providing the customer the option to receive the information at the time of the call or alternatively receiving the information in writing to read in their own time.

UR Response

- 2.127 We welcome the broad support for introducing the measure. We are of the view that there should be transparency on the setting of a fixed direct debit and that consumers should have absolute clarity as to how and why their direct debit has been set at a certain level (including new direct debits or when amendments to direct debits are made). Suppliers should have documented processes in place to ensure consistency of the information shared with consumers regarding the setting of their fixed direct debit.
- 2.128 We acknowledge the suggestion to allow consumers, especially those who are vulnerable, to approach the supplier on an ad hoc basis to review their payment plan and that discussions around payment plans are tailored to individual circumstances. As noted in Measure 3, suppliers must review fixed direct debits following a customer request. Customers can contact their supplier at any time to request a review of their payment plan and existing protections are in place for customers having difficulty or at risk of having difficulty paying their bills²¹.
- 2.129 We acknowledge the suggestion that suppliers should request the customer to check that the first payment has been debited, to ensure the

²¹ Refer to the Code of Practice on Payment of Bills and the Code of Practice for Consumers in Vulnerable Circumstances.

account has been set up correctly. As stipulated in the direct debit guarantee scheme, customers will receive written confirmation of direct debit instruction within three working days of a telephone call or online sign up, or no fewer than 10 working days before the first collection. Customers will be notified of how much will be taken and when. Recognising the current processes in place, we therefore do not propose additional requirements.

- 2.130 We are encouraged to see that several suppliers stated that their existing processes already align with this requirement and others noted ways in which the requirements could be readily implemented.
- 2.131 We are still of the view that customers should receive clear and accessible communications, ensuring transparency and clarity as to how the direct debit payment plan operates. This should include an explanation at the point of sign up (verbally if in person or via phone or written if online) and confirmed in writing by the customer's chosen method of contact.

UR decision

- 2.132 Measure unamended

Measure 3

Reviewing the fixed direct debit - the fixed direct debit review must be conducted on a regular basis at set regular intervals (a minimum of six months) and the value must be based on up-to-date accurate information.

- a) Suppliers must conduct a regular review of fixed direct debits to ensure they accurately reflect the customer's actual energy usage. This must occur (i) at least every six months (as a minimum) or (ii) if there is a trigger such as a build-up of excess credit, or (iii) following a customer request.
- b) Customers can submit their own meter reads to their supplier, these must be used by the supplier to review their fixed direct debits to ensure the value is based on accurate information and not estimated reads.
- c) If a supplier changes a customer's fixed direct debit (e.g. due to a tariff change or a supplier-initiated review) the customer must receive clear, informative and timely communications on the fixed direct debit change, including the supplier's reason for the change. This communication must be sent by the customer's preferred means of contact. The communication cannot be solely through information on the face of the bill (as per Setting Fixed Direct Debits Measure 2).
- d) In addition to the six-month review, suppliers must have controls in place to identify and trigger a review when a customer has excessive credit or debit amounts accrued (further detail on what is deemed excessive is defined under supplier processes for return of customer credit).

Stakeholder feedback

- 2.133 There was broad support across energy suppliers and consumer bodies for implementing this measure, which will help protect consumers from excessive credit or debit balances.
- 2.134 A consumer body advocated for the need to provide greater protection for customers by mandating a review one month after initial set-up for new direct debit customers. They believe that this review should confirm that the payments are being received and credited to the right account which may also protect customers from getting into debt.
- 2.135 A number of suppliers stated that their existing direct debit review processes already align with this requirement.
- 2.136 A supplier highlighted that if the customer has failed to submit a meter

reading, the fixed direct debit review cannot be completed based on an estimated read. They therefore rely on customers providing up-to-date information.

- 2.137 A supplier was opposed to the requirement for changes to fixed direct debit communications to be sent by the customer's preferred means of contact and not solely through information on the face of the bill. They believed that using existing forms of contact, such as the bill, benefits the customer by streamlining sources of information, benefits the supplier by preventing additional cost and also has an environmental benefit by reducing the amount of post.
- 2.138 A supplier noted that the proposal to have controls in place to identify and trigger a review when a customer has excessive credit or debit amounts accrued, works against their current methodology which takes into account the seasonal nature of energy consumption, meaning any credit balances held temporarily will serve to spread the cost of energy usage evenly over the 12 months of the year. They believe this proposal may increase the volatility of subsequent direct debit amounts, which could lead to increased customer frustration and confusion.

UR Response

- 2.139 We welcome the broad support for introducing the measure which aims to ensure timely reviews are conducted and helps ensure that the level of the fixed direct debit is as accurate as possible and reflective of a customer's usage..
- 2.140 We are encouraged to see that a number of suppliers stated that their existing direct debit review processes already align with this requirement.
- 2.141 We acknowledge the concerns raised in relation to the requirement for changes to direct debits to be sent by the customer's preferred means of contact. However, we are still of the view that customers should receive clear and accessible communications, ensuring transparency and clarity as to how and why their direct debit has been set at a certain level. This is particularly important for vulnerable customers and we expect suppliers to meet this requirement.
- 2.142 We recognise the request for greater protection for new direct debit customers by mandating a review one month after initial set-up, including confirmation that payments are being received and credited to the right account. As stipulated in the direct debit guarantee scheme, customers will receive written confirmation of direct debit instruction within three working days of a telephone call or online sign up, or no fewer than 10 working days before the first collection. Customers will be notified of how

much will be taken and when. We also expect suppliers to have their own systems and processes in place to identify missed payments and contact the customer if any issues are encountered. As a result we do not propose additional requirements.

- 2.143 We also acknowledge the concerns raised in relation to the excessive credit or debit review trigger. In order to account for the seasonality in the cost of energy, and taking into consideration supplier responses in this regard, we have amended the definition of excessive credit (see return of customer credit Measure 1). We believe that this definition will ensure that consumers are protected from paying in excess of their annual usage, whilst ensuring that the direct debit payment model functions as intended.

UR decision

- 2.144 Measure unamended

Return of customer credit

Measure 1

Customer credit – customers on a fixed direct debit must not have excessive credit on their account and any accrued customer credit must be easily obtained from their supplier.

- a) Excessive credit is defined as the monetary value in excess of an average three-month period of usage over a 12-month period (therefore taking account of seasonal usage).
- b) Any customer in credit can, on request, receive payment of their credit in a timely manner and this must not require multiple contacts by the customer. This must take account of the latest actual meter reads and coverage of an imminent bill. The payment must be made within a maximum of 28 days from the request being made by the customer (or as soon as is practical).
- c) Excessive customer credits must trigger a review by the supplier to ensure the customer's fixed direct debit is set at the correct level. If the customer is paying in excess of their usage, the supplier must either reduce the customer's fixed direct debit or refund the customer's credit (dependent on the customer's preferred option).

Stakeholder feedback

- 2.145 There was broad support across consumer bodies for implementing this measure, which will help protect consumers from excessive credit balances and ensure refunds are easily obtained. They welcomed the

clear definition of 'excessive credit'.

- 2.146 One consumer body recommended that if an account is closed and credit exists after the final bill has been settled, the supplier should automatically refund this without the refund having to be requested. They also urged us to obtain further information on the amount of credit suppliers hold and the reasons the credit has not been refunded.
- 2.147 One consumer body recommended that the proposal is strengthened by outlining that suppliers must provide customers with clear and accessible information regarding the processes for obtaining any accrued credit. This should include information readily available in accessible formats, multiple languages, and for digitally excluded households.
- 2.148 There was mixed feedback across suppliers. Several suppliers were supportive of the proposals and stressed that refunds must be based upon actual meter reads to ensure that the credit build-up is a true reflection of actual consumption.
- 2.149 Two suppliers raised concerns in relation to the definition of excessive credit. One supplier stated that defining excess credit as the monetary value in excess of an average three-month period of usage over a 12-month period does not adequately consider the seasonal fluctuations of usage. They noted that this may prompt return of credit in the summer months which will substantially increase fixed direct debit payments in the winter months, increasing the volatility of direct debit amounts. The supplier stated that their current methodology behind the operation of direct debits will need to be revised, and significant development will be required to implement this proposal at substantial cost.
- 2.150 Another supplier stated that excessive credit is a subjective term for each individual and applying a universal amount across the customer base will result in disruption to many customers. They noted that accrued credit will smooth energy bills in higher consumption months. They believe that any prescriptive measure should be considered through the lens of future consumption trends and allow suppliers flexibility to factor this into forecasts.

UR Response

- 2.151 We understand and recognise the mixed feedback from respondents. In particular, the concerns raised regarding the definition of excessive credit.
- 2.152 We recognise that the fixed direct debit payment model can deliver significant consumer benefits, particularly in smoothing out energy bills throughout the year thereby improving affordability and predictability.

Credit balances are an intrinsic feature of the fixed direct debit payment model whereby customers overpay for their energy in summer before underpaying in winter.

- 2.153 In order to account for the seasonality in the cost of energy, and taking into consideration supplier responses, we have amended the definition of excessive credit. Excessive credit is defined as credit balances above the level the supplier needs to collect to cover a consumer's underpayment over the winter months. We believe that this definition will ensure that consumers are protected from paying in excess of their annual usage, while ensuring that the direct debit payment model functions as intended.
- 2.154 We also expect Measure 1, which ensures the setting of fixed direct debits is based on the best and most accurate usage information, and Measure 3 which ensures that a direct debit review is conducted on a regular basis (a minimum of six months), will reduce the likelihood of suppliers accruing excessive credit balances for their domestic customers. As a result, we do not think that monitoring consumer credit balances and reasons is necessary at this stage.
- 2.155 This new measure will also provide further protection as consumers can request to receive payment of their credit at any time, which must be returned within a maximum of 28 days from the request being made.
- 2.156 In response to the suggestion to strengthen the proposals by outlining that suppliers must provide customers with clear and accessible information regarding the processes for obtaining any accrued credit, we believe that this is captured in Setting Fixed Direct Debits Measure 2.
- 2.157 We do not propose additional rules relating to closed customer accounts, noting the current requirement to use best endeavours to refund any outstanding credit to the customer within eight weeks of the licensee ceasing to provide a supply of electricity/gas to the customer²². We expect suppliers to comply with existing licence requirements to take all reasonable steps to bill customers within six weeks of contract termination and expect suppliers to meet their obligations to return credit on closed accounts in a timely manner.

UR decision

- 2.158 Measure amended

²² Gas supply licence condition 2.19.13: Final Bill or Statement. Electricity supply licence condition 38 (13): Final Bill or Statement.

Measure 1 - Customer credit – customers on a fixed direct debit must not have excessive credit on their account and any accrued customer credit must be easily obtained from their supplier.

a) Excessive credit is defined as credit balances above the level the supplier needs to collect to cover a consumer's underpayment over the winter months.

b) Any customer in credit can, on request, receive payment of their credit in a timely manner and this must not require multiple contacts by the customer. This must take account of the latest actual meter reads and coverage of an imminent bill. The payment must be made within a maximum of 28 days (or earlier if practical) from the request being made by the customer.

c) Excessive customer credit must trigger a review by the supplier to ensure the customer's fixed direct debit is set at the correct level. If the customer is paying in excess of their usage, the supplier must either reduce the customer's fixed direct debit or refund the customer's credit (dependent on the customer's preference).

3. Monitoring and reporting

- 3.1 In the consultation paper we asked respondents if they had any comments on the proposed approach for implementation, monitoring and reporting upon the mandatory requirements across the following four areas:
- a) Consumers in vulnerable circumstances;
 - b) Customer contact centre services;
 - c) Supplier processes for setting fixed direct debits; and
 - d) Supplier processes for return of customer credit.
- 3.2 We proposed that the requirements for consumers in vulnerable circumstances and customer contact centre services would be implemented through a new mandatory CoP on Customer Service. We also stated at this time that this new CoP would become a new licence requirement in the electricity and gas supply licences for those supplying domestic customers and as such, suppliers will be required to comply with the licence obligation and the requirements set out in the associated new CoP.
- 3.3 We also proposed that the supplier processes for setting fixed direct debits, and for supplier processes for the return of customer credit, would be directly included in the electricity and gas supply licences for those supplying domestic customers as a new or amended licence condition.

Monitoring and reporting

- 3.4 To monitor compliance with the CoP and the new/amended licence conditions we proposed a number of options including:
- a) Confirming compliance with the new/amended licence conditions through the annual Statement of Licence Compliance (SoLC) process;
 - b) Monitoring elements of the CoP via supplier reviews with customers (to be submitted as supplementary information during the SoLC process); and
 - c) Monitoring of supplier customer contact centre KPIs on a monthly basis via the Retail Energy Market Monitoring (REMM) reporting framework.
- 3.5 Suppliers would be asked to confirm their compliance with the new/amended licence conditions through the annual SoLC process which

is submitted annually in February for the preceding calendar year. This return confirms compliance and highlights areas of potential non-compliance (including compliance proformas) with each supply licence condition for the reporting period. The SoLC submission is accompanied by a letter of assurance, signed by the Chief Executive Officer or Managing Director of the supplier. Suppliers are expected to inform UR of any areas of potential non-compliance or risk of non-compliance as soon as they are aware of them (throughout the reporting period) and to provide detail to us of the remedial action being taken to address compliance issues.

- 3.6 We also stated that if we identify potential non-compliance with the new licence conditions, licence modifications or the new CoP we will investigate the potential licence breach pursuant to our Enforcement Policy²³.
- 3.7 Alongside the monitoring of licence conditions and the new CoP, we stated that we would continue to monitor supplier customer contact centre KPIs, and if we identify any areas of concern, we will investigate with the supplier. We may decide in the future that other reporting metrics are required to assist with the monitoring of the new CoP and/or in response to market issues.
- 3.8 We stated that we would provide details on the implementation timelines and how we will monitor compliance in this Decision paper.

Stakeholder feedback

- 3.9 Consumer bodies agreed and welcomed the proposed approach for implementation of the new mandatory CoP and the proposed amendments to the supply licences. One wholly supported the principle of making enhanced standards of customer service, particularly in relation to consumers in vulnerable circumstances.
- 3.10 One supplier was supportive of reporting through the SoLC process.
- 3.11 Some suppliers highlighted that the Consultation paper set out a significant piece of work for suppliers to implement on top of existing CoP requirements and anything that requires system changes and changes to customer communications will take time to implement. Another supplier said that they should be provided with sufficient time to implement any new requirements. Concerns were raised over the large range of new specific requirements being introduced by us in a short space of time and said that suppliers would need a at least 12 months to implement the

²³ [UR Updated Enforcement Procedure - \(uregni.gov.uk\)](http://uregni.gov.uk)

proposed changes.

- 3.12 One supplier highlighted that the additional reporting may be challenging, and they remained concerned about the potential requirement to complete a retrospective annual submission. They also questioned if the continued monitoring of contact centre KPIs was still necessary on a monthly basis.
- 3.13 One supplier believed that introduction of this CoP will lead to a reduction in innovation and new products in the market as suppliers will have to divert funds to this. They also suggested that we consider how the CoP can promote competition in the market to ensure that suppliers can continue to innovate.
- 3.14 One consumer body said they had concerns about the robustness of the proposed approach for implementation, monitoring and reporting. They also said they would like to see greater detail in the final Decision paper on how we will proactively seek to identify any potential non-compliance with the new CoP and licence modifications.

UR Response

- 3.15 We have taken on board all feedback we have received and the timeframes for implementation are included in section 4.
- 3.16 The reporting of monthly customer contact centre metrics/KPIs is seen as an integral part of the reporting and monitoring process for the CoP on Customer Service. This monthly reporting is not only for suppliers to identify issues at the earliest opportunity, but also allows us to identify if suppliers are having issues which are resulting in a reduced level of service for the customer. This allows us and suppliers to identify any issues which are detrimental to the consumer quickly and efficiently and deal with these as and when they occur.
- 3.17 This early detection allows us to actively engage with the licensees so they can identify and remedy any issues to ensure that all consumers (but in particular those in vulnerable circumstances) receive the best customer service experience possible.
- 3.18 Suppliers represent the consumer-facing element of the energy market, and it is our expectation that they make it easy for consumers to contact them. They must ensure that their customer service arrangements are fit for purpose and that they have the systems and processes in place to adequately deliver their customer contact centre, so all consumers receive a level of customer service which is efficient, timely and meets their needs. This includes during times of excessive customer contacts.
- 3.19 We believe that good customer service is not negotiable and investing in

customer service is one of the key elements to long-term business success. We do not agree that the introduction of a CoP on Customer Service will lead to a reduction in innovation in the market but instead will lead to new and innovative technologies and creative problem-solving which will ensure customers receive the best customer service and lead to successful outcomes for suppliers.

UR Decision

- 3.20 We recognise the need to balance transparency and effective monitoring with the impact of regulatory burden. We aim to strike a fair balance to ensure we can be satisfied that the obligations of the CoP and licence conditions are being met, while ensuring that any reporting requirements of suppliers is proportionate.
- 3.21 Having taken on board feedback from consultation responses, and following consideration of other work areas including the introduction of a new CoP for Consumers in Vulnerable Circumstances, we are further developing our monitoring and reporting requirements in these two areas.
- 3.22 Following the completion of the consultation process on the relevant proposed licence modifications, should they be implemented, we will publish an information paper detailing our monitoring and reporting requirements. This paper will include relevant monitoring and reporting requirements for both the CoP for Consumers in Vulnerable Circumstances and the CoP on Customer Service and will streamline the requirements where possible.
- 3.23 Suppliers should continue to submit both their REMM data²⁴ and their monthly call centre performance metrics²⁵ until the new monitoring and reporting requirements have been communicated.

²⁴ This includes REMM submissions in relation to the CoP on Provision of Services for persons who are of pensionable age, disabled or chronically sick.

²⁵ Submitted monthly to C&E Analyst

4. Implementation

- 4.1 We will implement the new CoP on Customer Service through a new proposed licence condition (outlined in section 5). The new proposed licence condition will be enacted through the statutory licence modification process which has been published alongside this Decision paper.
- 4.2 A number of suppliers have indicated throughout their consultation responses that they were already meeting the requirements of a number of the measures. Therefore we do not feel that implementation should cause any significant issues for suppliers. In addition, through our engagement with suppliers, we understand that some have already made changes to meet the requirements following the publication of our Guidance Note on 7 September 2023.
- 4.3 We are cognisant that some of the required measures may require system changes for some suppliers, for example the introduction of the freephone number for those on the CCR and the local (low cost) number. As a result, we recognise the need for an implementation period.
- 4.4 Licensees will have a period of 6 months following the completion of the licence modification process before we will require reporting of compliance with the new requirements of the CoP and the new proposed licence requirements. It is anticipated that any required licence modifications will be in place by April 2025. Further arrangements for the monitoring and reporting of compliance will be detailed in an information paper as outlined in section 3. The monthly reporting of call centre metrics and the relevant REMM returns will continue in their current form.
- 4.5 Alongside this Decision paper, we have published a statutory consultation notice on the proposed licence modifications for a 28 day consultation period.
- 4.6 We will engage with any supplier should they require clarification around what is expected of them to meet any of the requirements that are set out in the CoP on Customer Services or relevant proposed licence conditions.
- 4.7 We will monitor the effectiveness of the CoP in ensuring that suppliers' customer service remains at levels which are deemed acceptable and provide appropriate protections for those customers in vulnerable circumstances.
- 4.8 Where the UR considers it necessary to amend this CoP it will consult on any proposed changes. Depending on the nature of these amendments, the consultation may be restricted to those companies holding an electricity or gas supplier licence, or may include key stakeholders (e.g.

consumer groups), or may be a public consultation.

5. Licence conditions

- 5.1 As proposed, we will implement the proposals set out in the Consultation paper through a new CoP and new/amended licence provisions:

Proposed Licence Condition: Code of Practice on Customer Service

- 5.2 We will implement the new CoP on Customer Service through a new licence condition across all gas and electricity domestic supply licences. These will be enacted through the statutory licence modification process which has been published alongside this Decision paper.
- 5.3 For gas and electricity domestic supply licences a new proposed licence condition will be included specifically for the CoP on Customer Service.
- a) For gas it is proposed to include new licence condition 2.11a; and
 - b) For electricity it is proposed to include new licence condition 31a.

Proposed Licence Condition: Processes for setting fixed direct debits

- 5.4 We are proposing to implement a new licence condition for the processes of setting fixed direct debits for customers across all gas and electricity domestic supply licences. These will be enacted through the statutory licence modification process.
- 5.5 For gas and electricity domestic supply licences a new proposed licence condition will be included specifically for processes for setting fixed direct debits.
- a) For gas it is proposed to include new licence condition 2.18a; and
 - b) For electricity it is proposed to include new licence condition 27b.

Proposed Licence Condition: Processes for the return of customer credit

- 5.6 We are proposing to implement a new licence condition for the processes for the return of customer credit across all gas and electricity domestic supply licences. These will be enacted through the statutory licence modification process.
- 5.7 For gas and electricity domestic supply licences a new proposed licence condition will be included specifically for processes for returning customer credit.
- a) For gas it is proposed to include new licence condition 2.18b; and

- b) For electricity it is proposed to include new licence condition 27c.

Amended Licence Condition: Terms and Conditions of Electricity/Gas Supply Contracts

- 5.8 We are proposing to amend existing licence conditions to include a cross reference to our new proposed licence condition around the processes for setting fixed direct debits. These will be enacted through the statutory licence modification process.
- 5.9 For gas and electricity domestic supply licences an amended licence condition will include a cross reference specifically for processes for setting fixed direct debits.
 - a) For gas it is proposed to amend licence condition 2.18: Terms and Conditions of Gas Supply Contracts specifically condition 2.18.14b; and
 - b) For electricity it is proposed to amend licence condition 27: Terms and Conditions of Electricity Supply Contracts specifically condition 27(14)b.

Amended Licence Condition: Provision of Information to Customers/Consumers

- 5.10 We are proposing to amend existing licence conditions to include a cross reference to our new proposed licence condition around the processes for the return of customer credit. These will be enacted through the statutory licence modification process.
- 5.11 For gas and electricity domestic supply licences an amended licence condition will include a cross reference specifically for processes for the return of customer credit.
 - a) For gas it is proposed to amend licence condition 2.19: Provision of Information to Consumers specifically condition 2.19.13b; and
 - b) For electricity it is proposed to amend licence condition 38: Provision of Information to Customers specifically condition 38(13)b.

6. Next steps

- 6.1 Alongside this Decision paper, we have published our statutory consultation and notices for domestic electricity and gas suppliers to introduce the proposed new licence conditions for: the CoP on Customer Service; the processes for setting of fixed direct debits; and the processes for the return of customer credit.
- 6.2 We intend to publish our final licence modification decisions in January 2025 to implement the new licence conditions by April 2025. Licensees will have a period of 6 months following the completion of the licence modification process before we will require reporting of compliance with the new requirements of the CoP and the new licence requirements.
- 6.3 For clarity, the implementation of this new CoP does not require suppliers to draft their own CoP on Customer Service and submit to UR for approval. The CoP published alongside this decision paper is the CoP which should be followed by all domestic gas and electricity suppliers.

Appendix 1 – Code of Practice on Customer Service

Code of Practice on Customer Service

1. Overarching Principles of the Code of Practice

- 1.1. We expect energy licensees to have robust systems and policies in place to ensure that their consumers receive supportive, timely and accurate customer service. The objective of this Code of Practice (CoP) is to help ensure that those expected customer services are provided and that customers are protected when liaising with their service providers. It aims to do this by putting in place mandatory levels of customer service that energy suppliers must provide to their domestic customers, including additional requirements for those customers in vulnerable circumstances. This will help ensure that all customers have a positive and timely customer service experience.
- 1.2. This CoP covers domestic premises for energy utilities – electricity and gas supply. It includes twelve over-arching measures underpinned by some detailed requirements. These are applicable to all gas and electricity domestic supply licensees in Northern Ireland.
- 1.3. Compliance with this CoP is a mandatory licence requirement on all domestic electricity and gas suppliers. Any breach of the CoP will be considered a breach of licence.
- 1.4. The obligations in this CoP will apply to each licensee and any representatives of the licensee. **For clarity, where a licensed company contracts with a third party for the provision of any services, the licensed company must ensure that the third party complies with all components of this CoP.** Any breaches of this CoP or the industry procedures by a third party will be deemed to be a breach by the licensed company.
- 1.5. Nothing in this CoP is intended to, or should be deemed to, constitute an exemption from existing regulatory requirements and/or obligations under other industry agreements.
- 1.6. Nothing in this CoP is intended to, or should be deemed to, constitute an exemption from each licensee’s legal obligation to comply with any and all relevant legislation, statute, statutory instrument, regulation or order (or

any provision thereof) or any subordinate legislation. Licensees are responsible for ensuring that the industry procedures they develop are compliant with all relevant legislation.

- 1.7. Where we refer to customer care registers or customer care register holders, this will apply to the existing customer care registers and customer care register holders (at time of publication this includes all suppliers). When the changes to the customer care register structure are implemented, the measures will apply to the customer care register(s) and customer care register holder(s) at that time. This is covered in the CoP for Consumers in Vulnerable Circumstances (Electricity Licence Condition 31 and Gas Licence Condition 2.11).
- 1.8. Where the UR considers it necessary to amend this CoP it will consult on any proposed changes. The consultation may be restricted to those companies holding an electricity or gas supplier licence and may include key stakeholders (e.g. consumer groups) or may be a public consultation, depending on the nature of the changes.

2. Measures included in the Code of Practice and requirements

- 2.1. Each licensed company must comply with the following twelve measures in all aspects of their customer service operations to ensure all consumers can engage effectively with them and achieve fair outcomes.
- 2.2. These measures stipulate the overall mandatory requirements that all energy licence holders must meet in dealing with customers. It is the licence holders' responsibility to determine how best to deliver the measures. However, compliance monitoring will be based on the requirements determined by the UR.
- 2.3. For ease, the measures have been categorised into 2 sections – Customers, in particular those in Vulnerable Circumstances and Customer Contact Centre Services.
- 2.4. For clarification, the definition of vulnerable/vulnerability (in accordance with the CoP for Consumers in Vulnerable Circumstances) is as follows:

'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.'

Customers, in particular those in vulnerable circumstances

Measure 1 - Domestic consumers, in particular those in vulnerable circumstances, must be able to easily identify a method of contacting their energy supplier that meets their needs. The effectiveness of these methods must be regularly reviewed by suppliers.

In order to fulfil this requirement, suppliers must:

- (i) provide a customer contact service that enables all domestic customers to contact them easily. As a minimum, this service must include a range of contact methods that meet the needs of domestic customers, including the needs of those domestic consumers in vulnerable circumstances (as defined in the CoP for Consumers in Vulnerable Circumstances, and include provision for those customers who have English as a second language.
- (ii) provide as a minimum, to reflect the diversity of different customers' communication needs, a broad range of contact methods that reflect the needs of customers that:
 - a) are digitally excluded (e.g. a phonenumber/postal option).
 - b) find it easier to communicate digitally (e.g. digital methods of contact such as email, webform, live chat, SMS/secure messaging platforms or any new technology which falls into this category).
 - c) have special communication needs (e.g. customers with a visual or hearing impairment, or customers with a learning disability. Options should include but not be limited to braille, large font, alternative language format, screen reader, voice-text analytics or any new technology or system which falls into this category).
- (iii) provide a range of contact methods across all three areas listed in (ii) a – c above. These contact methods should be promoted to ensure awareness – information on the available contact methods should be prominently displayed on webpages and on all written communications to customers including all formats (no more than two clicks from the homepage on the supplier website and easily identifiable on each page in written communications).
- (iv) review the effectiveness of available contact methods, every two years (as a minimum) in line with the review period set out in Measure 10.1 of the CoP for Consumers in Vulnerable Circumstances.

- (v) The purpose of this review is to ensure that the contact methods on offer continue to best meet customers' needs. These reviews may highlight gaps, and these should be actioned. Furthermore, all contact methods should be promoted to ensure awareness. These reviews should be documented, and any changes made should be recorded. A copy of the review must be submitted to the Authority and a public version made available.
- (vi) Should contact methods be deemed lacking in any area as a result of the review, processes should be in place to provide the contact method required by customers (or a suitable alternative) as soon as practical but no later than 3 months from the date of the review.

Measure 2 - Suppliers must have processes in place to identify and prioritise enquiries from domestic consumers in vulnerable circumstances who may require immediate assistance, or representatives acting on their behalf and in their interest. This should include adequate training to ensure these processes are being followed sufficiently (discussed under Measure 6 in customer contact centre services).

In order to fulfil this requirement, suppliers must:

- (i) have processes to prioritise enquiries from:
 - a) domestic consumers in vulnerable circumstances who, due to their circumstances or characteristics, may require immediate assistance, guidance or advice; and
 - b) any representatives acting on behalf and in the interest of a domestic consumer in vulnerable circumstances who, due to their circumstances or characteristics, may require immediate assistance, guidance or advice.
- (ii) have a clear policy on how they will take into account a customer's circumstances and characteristics when determining who to prioritise. The CoP for Consumers in Vulnerable Circumstances contains a definition of vulnerable/vulnerability and information for suppliers on consumer characteristics and circumstances. This must also take into account customers on the customer care register (e.g. customers with a visual or hearing impairment or a customer with a learning disability). Additional non-exhaustive examples of the characteristics and circumstances that could prompt a supplier to provide immediate assistance, guidance or support include:

- a) customers that are off-supply, or may soon be off-supply, due to the customer running out of credit on their pre-payment meter; and
 - b) customers whose characteristics or circumstances mean that their health could be significantly harmed if they are not provided with immediate assistance, guidance or support.
- (iii) recognise that vulnerability is transient and that an individual's characteristics or circumstances can change over time.
- (iv) train agents to identify signs of vulnerability and be mindful that their customers will not always proactively indicate that they are vulnerable or self-identify as such.
- (v) have policies and processes in place to easily facilitate a person or organisation contacting a supplier in the interest of, and on behalf of, a domestic consumer in vulnerable circumstances.
- (vi) have processes to identify and prioritise enquiries from representatives contacting them on behalf of domestic consumers in vulnerable circumstances that require immediate assistance. These processes will also need to ensure that suppliers are able to verify third parties contacting them on behalf of a domestic consumer in vulnerable circumstances. This could be achieved by a registration process, similar to the nomination service for those customers who wish to have their bills redirected to a nominated person, where a third party is nominated.

Measure 3 - Suppliers must implement appropriate processes/services to provide a freephone telephone number for domestic consumers that are on the Customer Care Register (CCR) and a local (low cost) phone number for those domestic customers who are experiencing financial difficulty. Eligible customers must be made aware of and directed to a suitable method of contact as soon as their supplier is aware of their eligibility.

In order to fulfil this requirement, suppliers must:

- (i) provide a dedicated freephone number for domestic consumers on the customer care register (e.g. customers with a visual or hearing impairment or a customer with a learning disability).

Customers who fall into this category will be recorded on the CCR therefore these customers can be contacted via their preferred method of contact and provided the freephone number to use.

and;

- (ii) provide a local (low cost) telephone number for those experiencing financial difficulty.
 - This number must be provided at the earliest opportunity to the customer.
 - If a customer is in financial difficulty and is then added to the CCR, the freephone telephone number must be provided to them at the earliest opportunity.

Or suppliers can:

- (iii) provide a freephone number for all customers on the CCR or in financial difficulty;

or

- (iv) provide a freephone number for all domestic customers.

Customer Contact Centre Services

Measure 4 - At an overall level, suppliers must ensure they have and maintain robust internal capability, systems and processes to enable them to adequately deliver their customer contact centre services.

In order to fulfil this requirement, suppliers must:

- (i) have the appropriate systems and processes (to include premises, facilities, staff, equipment and IT systems), to enable the provision of a quality and efficient customer contact centre service to their customers. These systems and processes must also reflect the needs of those consumers in vulnerable circumstances and how they are effectively served.
- (ii) ensure that their customer contact centres and associated services be adequately resourced to deal with all consumer contacts across a range of channels including telephone, emails, webchat and social media in a timely and efficient way.
- (iii) have in place systems and processes to ensure that customer service levels are maintained at all times throughout the year, including during periods of high call volumes.

Measure 5 - Customers must be able to easily identify methods of contacting their suppliers.

In order to fulfil this requirement, suppliers must:

- (i) ensure that customer enquiry service information is easy to find and prominently displayed on suppliers' websites (i.e. on, or one click away from the homepage of their website), suppliers' apps, and any written communication (e.g. on bills or statements of account) to the customer.
- (ii) ensure that customers are able to easily identify methods of contacting their suppliers which means that they can easily find information on suppliers' contact methods, so that customers can choose the method that meets their needs.
- (iii) consider the needs of domestic consumers in vulnerable circumstances (as set out under Measures 1-3 (consumers, in particular those in vulnerable circumstances section), including customers on the customer care register) when ensuring that enquiry service information is easy to find.
- (iv) regularly seek feedback from their customers about how to make it easy to find methods of contacting them, and to act on the feedback received. By seeking feedback from consumers on methods of contact, it will allow suppliers to tailor their approach to suit their customers' needs, including those in vulnerable circumstances.

Measure 6 - Suppliers must ensure customer contact centre services are open at times that meet the needs of their domestic customers.

In order to fulfil this requirement, suppliers must:

- (i) take into account the needs of their customers when setting their opening hours, including consideration of seasonality when there is likely to be higher call volumes, and an increase in email and social media contacts in winter.
- (ii) take into account the needs of customers that are unable to engage between standard opening hours 09:00 – 17:00 Monday to Friday (for example as standard opening hours may vary). For instance, by extending opening hours by one hour a day outside the normal eight hour working day Monday to Friday or five hours in total over the weekend.
- (iii) regularly review their opening hours (at least once annually, but more frequently if appropriate) to ensure that they are open at times that best meet their customers' needs. This must take account of seasonality, for example in

winter, where there is likely to be a higher volume of calls, and an increase in email and social media contact.

- (iv) not close for an unreasonable length of time or frequency, applying to both planned and unplanned closures. Unreasonable length/frequency will be determined by UR considering the following (non-exhaustive) factors: the industry standard for closures for the time period in question (in the UK/RoI); actual length of time a supplier's call centre was closed over the time period in question; frequency of closures over a rolling 12 month period; whether timely notification was provided to customers regarding the closure dates; whether the closure caused significant customer detriment; and KPI performance for the months surrounding the time period.

Measure 7: Consumers must be able to reach their supplier's customer contact centre easily without experiencing an excessive call wait time to speak to an operative (not over an average wait time of four minutes).

In order to fulfil this requirement, suppliers must:

- (i) ensure that average call wait times not be over four minutes, this is calculated on a monthly basis by each supplier. The average call wait time threshold will be regularly reviewed by UR and, from time to time when appropriate, may be adjusted to drive continuous improvement.

Measure 8: Customer contact centre operatives must be adequately trained to ensure they can provide accurate and consistent information to consumers.

In order to fulfil this requirement, suppliers must:

- (i) provide the appropriate level of training and oversight. This will include initial training for new employees, vulnerability circumstances identification training, ongoing review of training needs and adequacy of training, refresher training for all employees as needed and additional training when there are any changes to internal systems and processes for all their contact centre operatives to ensure they have the skills and knowledge to provide consistent and accurate information to all consumers (including those consumers in vulnerable circumstances).
- (ii) have a process in place to allow redirection of the customer during the call to another contact centre operative who can deal with the query if a contact centre operative is unable to provide the information that the customer requires in the first instance. This must include the option for the contact centre operative to escalate the call to a specialist member of the team for more complex cases. If customers are passed over to alternative contact centre operatives, this must be done via a 'warm handover' with no

requirement for the customer to call back. If a customer is not satisfied with the information provided by a contact centre operative and they consider that their issue has not been adequately resolved, then the customer must be able to escalate their issue, for example to a manager.

Measure 9: Call back services must be offered by all suppliers and acted upon within two working days.

In order to fulfil this requirement, suppliers must:

- (i) offer a call back service for all domestic customers.

The call back service must:

- a) state the timeline in which the customer can expect to receive a call back²⁶. This must be no more than two working days from the initial contact.
- b) have adequate processes and resources in place to facilitate the operation of a call back facility within the timelines indicated by them.
- c) make at least three separate call back attempts if the supplier has been unable to reach the customer. The call back attempts should be spread out across different times of the day. The contact must also be in line with the customer's preferred means of contact.

Measure 10: Suppliers must ensure that their call abandonment rate is not excessive (not above 12.5%).

In order to fulfil this requirement, suppliers must:

- (i) ensure their customer service call abandonment rate not be above 12.5%. Call abandonment rate is number of customers who end their call before it is answered by the supplier's customer contact centre divided by all inbound calls including in-hours, and emergency number calls. The abandonment rate threshold will be regularly reviewed by UR and, from time to time when appropriate, may be adjusted to drive continuous improvement.

Measure 11 - A customer's call must never be disconnected when they contact their supplier during their customer contact centre operating hours (apart from circumstances outside of the supplier's control).

In order to fulfil this requirement, suppliers must:

- (i) never intentionally end or 'drop' a call with a customer. The only exception is when it is a result of circumstances outside of the supplier's control, such as

²⁶ A call back is where the supplier provides an option for the customer to choose that the supplier will call them back (and return their call).

the customer's phone signal or in those instances where the customer is being abusive or threatening to the call centre operative.

- (ii) ensure that their customer contact centre systems do not allow for calls to be cut off even after longer wait times.

Measure 12 - Written customer contacts (all mediums of written contact with consumers including webchat, social media platforms and emails but excludes postal correspondence) must receive timely responses within a maximum of two working days.

In order to fulfil this requirement, suppliers must:

- (i) provide an automatic receipt to customers who contact them by email, webchat, social media and online message platforms. This automatic response must outline alternative contact methods and, as a minimum, expected timelines for response. For correspondence received by post, a reply must be issued by the supplier to the customer within two working days (but not received by the customer within two working days).
- (ii) within two working days: provide a further response to close out the query or provide an update to the customer. If the query cannot be resolved within 2 working days a timeline must be provided to the customer at the earliest opportunity and must be within two working days of the customer initially contacting the supplier²⁷.
- (iii) provide updates (if the query cannot be resolved within the initial two working days) to the customer every two working days (as a minimum) until the query is satisfactorily resolved.
- (iv) ensure that all social media platforms be included in the requirement for a timely response as this medium of contact is being used by more consumers (where it is available) and as such we have updated the requirement to include this.
- (v) have documented processes in place to ensure that a consistent approach is taken for acknowledgement of receipt for all consumers across all written platforms.

²⁷ Where a written contact falls within the category of a written complaint under the supplier's Code for Complaints Handling, the timeframes contained within the CoP Standards on Complaints Handling Procedure will apply. We will continue to monitor suppliers' activities and response times under both CoPs and may make recommendations for changes to response times if there is supporting evidence to deem it necessary.

Resolving Disputes

Where a customer has a complaint related to an electricity/gas supplier's delivery of this CoP, then that customer should initially follow the supplier's complaints handling procedure.

Customers must also be informed of their right to seek help from the Consumer Council in the event that they do not feel that their complaint has been resolved sufficiently with their supplier.

Compliance Reporting

Each licensee must keep (and ensure that any representative keeps) a record of its compliance with its obligations under this CoP to ensure the Statement of Licence Compliance return can be completed.

Where a licensee has evidence of another licensee being potentially non-compliant with this CoP, then UR should be informed. UR shall assess the complaint and consider the most appropriate course of action to be taken, including any breach of relevant licence conditions.

Each licensee must provide to UR, in such manner and at such times as UR may reasonably require, such information as UR may deem necessary or appropriate to enable it to monitor the licensee's compliance with this CoP.

Glossary

| | |
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| AQ | Annual Quantity |
| AUF | Actual Usage Factor |
| BSI | British Standards Institute |
| BPF | Best Practice Framework |
| CAP | Christians Against Poverty |
| CCNI | The Consumer Council for Northern Ireland |
| CCR | Customer Care Register |
| CoP | Code of Practice |
| CRU | Commission for Regulation of Utilities |
| CS | Customer Service |
| DNO | Distribution Network Operator |
| EUF | Estimated Usage Factor |
| GB | Great Britain |
| ICO | Information Commissioner's Office |
| IVR | Interactive Voice Response |
| KPI's | Key Performance Indicator's |
| NEA | National Energy Action |
| NIEN | Northern Ireland Electricity Networks |
| Ofgem | Economic regulator of the energy sector in Great Britain |
| REMM | Retail Energy Market Monitoring |
| SoLC | Statement of Licence Compliance |
| UR | Utility Regulator |