

Consultation on the Utility Regulator's Social Action Plan 2009-2014

Question 1

Respondents are asked to comment on the impact of this paper with regard to equality of opportunity and good relations.

Council considers that this paper impacts positively on equality categories as well as vulnerable groupings. It supports the Utility Regulator's intention to encourage Phoenix and firmus energy to provide information in other languages as a household that does not include an adult with a sufficient grasp of English is considered a vulnerable utility customer.

Question 2

Respondents are asked their views as to whether we have considered all the characteristics that may contribute to or intensify vulnerability.

Council agrees with the vulnerability characteristics outlined in this paper.

Question 3

Respondents are asked to what extent they believe critical care provision could be improved. In particular respondents are asked to what extent similar emergency provisions in the event of a disruption to supply are required for gas. In responding, it would be useful if specific improvements could be detailed and in particular details of medical conditions or life saving medical equipment that require a constant supply of gas could be given.

Council agrees that the critical care provision operated by NIE and NI Water is vital for those customers dependent on life saving medical equipment and with medical conditions and feels that the gas suppliers should provide a similar service. This is, of course, paramount if the customer uses life saving medical equipment that requires a constant supply of electricity or gas, however, long-term illnesses can be made worse by the cold. It is, therefore, important that critical care provision is available to such customers and that they are informed of any disruption to supply and reconnected as a priority whether or not they use medical equipment.

Question 4

Respondents are asked to comment on whether they believe all customers have sufficient access to different payment methods offered by the utility suppliers. Respondents should list the barriers they perceive as preventing some vulnerable customers from accessing all payment methods.

According to Appendix 5, the greatest discounts are available to those customers paying for electricity and gas by direct debit. Those most vulnerable to fuel poverty are disadvantaged by this as they often do not have bank accounts and are more likely to use pre-payment methods or pay-as-you-go meters. Council suggests that the Utility Regulator encourage NIE, Phoenix and firmus energy to consider offering greater discounts to those who use alternative methods of payment to direct debit.

Ballymoney Borough Council's work in the area of energy efficiency has found that many residents are unaware of the various payment methods available to them. It would ask that the Utility Regulator works in partnership with the utility companies and those working with local Councils in the field of energy efficiency and fuel poverty to advertise payment methods available to customers.

Question 5

Respondents are asked to consider what measures, if any, need to be taken to ensure that pre-payment customers benefit equally from the introduction of retail competition in Northern Ireland.

Council acknowledges that, in order to avoid debt, it is important that customers have access to a wide variety of payment methods. Given that the pre-payment option is popular with those on lower incomes, Council feels that it is important that these customers are able to avail of the choice resulting from the introduction of retail competition in Northern Ireland without being penalised for choosing the pre-payment method. Given that pre-payment customers in Northern Ireland are not a more expensive group to service (point 5.39), Council suggests that the Utility Regulator encourage all utility providers to offer pre-payment tariffs that are not charged at a premium.

Question 6

Respondents are asked to comment on the merits of a harmonised approach in relation to helping vulnerable customers to avoid debt and to manage their way out of debt.

Council would support any proposal to encourage all of the energy companies to operate to an agreed best practice standard. It understands that customers who get into debt are encouraged to contact their supplier in the first instance and suggests that all suppliers include signposting to advice centres in their debt recovery policies.

Question 7

The Utility Regulator acknowledges the concerns of stakeholders around self-disconnections. Respondents are asked to comment on what should be done to

prevent vulnerable customers self-disconnecting for reasons of financial hardship.

Council acknowledges that some customers will self-disconnect because of their financial circumstances and suggests that the Utility Regulator encourage local energy suppliers to implement social tariffs in Northern Ireland. Social tariffs are special payment arrangements that benefit disadvantaged customers, e.g. those who receive certain state benefits, and are already available in Great Britain. Innovative social tariffs could make a considerable contribution to tackling fuel poverty.

Question 8

Respondents are asked to comment on what measures should be undertaken to raise awareness and which organisation(s) should take the lead on these measures.

Ballymoney Borough Council staff working in the field of fuel poverty report that there is poor public awareness about services and schemes available from the utility suppliers. Council suggests that suppliers undertake an awareness raising campaign through local media and that they hold information sessions for those working with customers most likely to be living in fuel poverty, e.g. the local energy efficiency advisers employed through the ten local Councils in the Northern Health & Social Services Board area. As these advisers have direct contact with vulnerable clients, they are well suited to circulate any relevant information.

Question 9

Respondents are asked to comment on whether there are any other key issues that should be considered.

The Northern Ireland House Condition Survey 2006 estimated that 35.2% of households within Ballymoney Borough Council are fuel poor. This is above the Northern Ireland average. As the Survey was undertaken before the increase in energy prices seen during 2008, it is now acknowledged that fuel poverty levels are likely to be over 40%. Council acknowledges that this Social Action Plan is an opportunity to bring forward a co-ordinated strategy to provide for vulnerable customers.

It is widely acknowledged that the best way to tackle social problems, such as fuel poverty, is through a partnership approach. Ballymoney Borough Council includes fuel poverty as part of its corporate strategy. The Director of Borough Services is a member of the Northern Investing for Health Partnership's Fuel Poverty Steering Group; it has established a locally based Warmer Homes Group to tackle fuel poverty and employs the NifHP's Fuel Poverty Co-ordinator as well

as the Causeway Energy Efficiency Adviser. Ballymoney Borough Council is very much part of an holistic approach to tackle fuel poverty and, therefore, welcomes the opportunity to respond to this consultation.

Question 10

Respondents are asked to comment on this future work plan.

Council feels that the document regarding the introduction of social tariffs should be brought to Government as soon as possible as this is one way of helping those customers living in fuel poverty as well as those in debt.

Council would encourage utility suppliers to introduce harmonised policies on debt management thereby reducing confusion amongst customers and suggests that any policy should include the signposting of customers to advice centres.

Council supports the growth of the gas network as gas-fired central heating systems have lower carbon emissions compared to oil-fired systems and offer customer choice.

Council has contributed financially to the EEL programme "Warmer Ways to Better Health" since 2005. In the first 3 years, this programme brought £101,075 into the Borough. Council responded to the consultation on the EEL and looks forward to the decision paper on its future.