

Consumer Protection Programme (2021-2024):

Updated plan for delivery



Consumer Protection Programme

- The [Consumer Protection Programme \(CPP\)](#)¹ was published in April 2019 and is one of the Utility Regulator's (UR) flagship projects. The CPP is our principal vehicle to deliver positive outcomes for domestic electricity, gas, and water consumers in Northern Ireland (NI) and includes a suite of bespoke projects aimed at enhancing consumer protection for all consumers.
- Four key objectives form the pillars of the CPP: Affordability, Equal Access, Empowerment through education and transparency, and Leadership and Engagement.
 1. **Affordability:** To ensure all consumers have access to **affordable** energy.
 2. **Equal Access:** To ensure **equal access** to utility services for all consumers.
 3. **Empowerment:** To empower consumers through **education** and **transparency**.
 4. **Leadership and Engagement:** To bring together a range of interested groups to examine key consumer, market and competition outcomes, identify research, best practice and highlight any regulatory considerations.
- In June 2020 the development and delivery of the CPP was deferred due to emerging and important consumer-facing issues around COVID-19. Those CPP projects due to be delivered by March 2021 were therefore put on hold in order to prioritise urgent COVID-19 service delivery issues.
- As the CPP was designed to be a flexible programme that would adapt to fit changing circumstances and account for the changing nature of vulnerability, our Board endorsed a proposal to review and re-scope the CPP in 2021. This allowed us to incorporate lessons learned from the COVID-19 pandemic and to resume the CPP later in 2021.

¹ <https://www.uregni.gov.uk/files/uregni/media-files/1%20CPP%20Final%20Decisions%20April%202019%20with%20links.pdf>

- As a result of the CPP review and re-scope a decision was made by our Board to extend the CPP over an additional two years starting in 2021/22 (Year 1); 2022/23 (Year 2); and 2023/2024 (Year 3).
- This document outlines the CPP re-scoped plan for delivery for the period 2021-2024.

Consumer Protection Programme: 2021-2024

Overall aim/goal: To deliver fair and equitable outcomes for domestic consumers of electricity, gas and water, in particular those in vulnerable circumstances

Key objectives

- 1. Affordability:** To ensure all consumers have access to affordable energy
- 2. Equal Access:** To ensure **equal access** to utility services for all consumers
- 3. Empowerment:** To empower consumers through **education** and **transparency**
- 4. Leadership and engagement:** To bring together a range of interested groups to examine key consumer, market and competition outcomes, identify research, best practice and highlighting any regulatory considerations.

Outputs: What is produced?

Final CPP

Shared definition of 'vulnerability'

Guaranteed standards of service for electricity consumers

Best Practice Framework and revised/enhanced Codes of Practice

Consumer insight and evidence base: domestic and non-domestic customer experience of energy market

Insight and evidence base of consumer experience of energy debt and workplan for support.

Information resource on best practice in relation to consumer protection

Current and accessible information on the energy market for consumers

Short-term outcomes: immediate difference made e.g. to consumers, UR

Establishment of practical measures to address some of the consumer difficulties brought about by vulnerability.

Improved supplier debt communications with consumers who are in financial difficulty, resulting in reduced levels of consumer debt and provision of support to help avoid supplier bad debt.

All relevant best practice on consumer protections is captured, shared and delivered for consumers in NI.

Benefits for consumers through enhanced protection and establishing best practice benchmarks.

Consumers will have access to published and accessible content to about energy the market and consumer outcomes.

Consumers can more easily access the best energy deals, to include those who are digitally excluded.

Longer-term outcomes/impacts

We are leaders in progressing the consumer protection agenda. We will bring clarity, consistency and best practice to consumer protection throughout NI utility markets.

Fairness of market outcomes for all consumers, including those in vulnerable circumstances.

Energy suppliers have the ability to facilitate delivery of any proposed changes to consumer protection work in an efficient, cost-effective manner.

1. CPP achievements to date

- During the initial year of the Programme (2019-2020) several high impact CPP projects were completed ([Table 1](#)) and a number were on track to be delivered by March 2021. This included a project on back billing arrangements, where we decided to limit electricity and gas back billing for domestic and microbusiness customers to 13 months and ensure that consumers are treated fairly. This was a comprehensive project, involving engagement with suppliers and key stakeholders to fully understand the extent of back billing in NI and how it affects consumers and microbusinesses. This resulted in the provision of additional protection for domestic and microbusiness customers.
- We also completed phase 1 of QuickCheck 101 where we reviewed the essential telephone service which provides reassurance to members of the public about the legitimacy of callers to their door claiming to be from utility network companies. We found that the service is operating well and providing vulnerable consumers with a sense of additional protection. During this phase, two gas suppliers joined the partnership.
- As stated before, in June 2020 the development and delivery of the CPP was deferred due to emerging and important consumer-facing issues around COVID-19.
- In 2021 we reviewed and re-scoped the CPP to incorporate lessons learned from the COVID-19 pandemic.

Table 1: Completed/In Progress CPP Projects (2019-2020)

CPP Project	Status	Outcomes
<p>Back-billing arrangements</p> <p>(Affordability)</p>	Complete	Where customers are not at fault, they are now afforded some protection from long-term back-bills due to the implementation of a 13 month limit on energy back-bills. This alleviates the stress and financial burden from customers who have fallen into arrears through no fault of their own.
<p>Review Quick Check 101</p> <p>(Equal Access)</p>	Stage 1 - Complete	Quick Check 101 now includes of gas suppliers alongside Network companies and provides enhanced protection for customers against bogus callers.
<p>Consumer Insights Trackers (Domestic and Non-domestic)</p> <p>(Leadership and Engagement)</p>	Complete/Ongoing	We now have current, NI-specific research used to provide evidence-based planning and decision-making for domestic and non-domestic consumers. These baseline surveys will be repeated to ensure the evidence is up to date and to enable comparisons over time.
<p>UR to take part in stakeholder and consumer engagement and also in working groups with external bodies</p> <p>(Leadership and Engagement)</p>	Complete/Ongoing	The ongoing engagement via the Consumer Vulnerability Working Group (CVWG), UK Regulators Network, Collaboration Network and one to one meetings with stakeholders has enhanced our reputation with consumer groups and UK wide bodies while increasing staff knowledge. Stakeholders have more information on our activities and an opportunity to contribute to projects and challenge ourselves and industry.
<p>Establish and adopt a definition of vulnerability for NI domestic consumers</p> <p>(Leadership and Engagement)</p>	Complete/Ongoing	The CPP decision paper established and confirmed the new definition of vulnerability for NI consumers. The definition has been widely circulated among key stakeholders and suppliers and network operators have begun work to operationalise it. We will use the Best Practice Project to formalise and embed the definition in licenses (see Table 2, page 3).
<p>Establish consumer/industry/UR group for consumer issues</p> <p>(Leadership and engagement)</p>	Complete/Ongoing	The CVWG has been established. This group serves as a link between ourselves consumer groups and industry. It has been vital in identifying and addressing issues for consumers, e.g. pre-payment meter accessibility issues.

2. Lessons learned from the COVID-19 pandemic and beyond

- The COVID-19 pandemic has had major impacts across all of society and has further highlighted the importance of identifying vulnerable utility consumers and those people who may need extra support. In addition, it highlighted an essential need for clear, transparent and timely communications.
- According to Which!² the pandemic has affected household and expenditure for everyone, but the impact has been felt unevenly across the population. Their research has highlighted that families on low incomes are more likely to have had greater expenditure during the pandemic. Which!'s research shows that 39% of consumers in NI made at least one adjustment to cover essential spending such as utility bills, housing costs, groceries, school supplies and medicines in the month prior to their survey. Although in line with the rest of the UK, this indicates that some households are experiencing financial difficulties in paying for every day essentials.
- We also identified the impact of increasing levels of domestic and non-domestic debt associated with the economic difficulties resulting from the COVID-19 pandemic. We recognise the potential longer-term implications of this across all consumers. Our own research³ has shown that almost six out of ten households were using more energy during the pandemic than before, with around a quarter of gas and electricity credit customers struggling at least occasionally to pay their bills
- In addition to the difficulties brought about by COVID 19, recent rapid and sustained increases in the global price of wholesale energy will be a further challenge for households and businesses.
- The revised CPP will now have a clear focus on debt, looking at supplier debt communications, assessment of ability to pay and research on consumer lived

² <https://consumerinsight.which.co.uk/reports/consumer-insight-report-2021-northern-ireland/download>

³ https://www.uregni.gov.uk/files/uregni/media-files/Consumer%20research%20on%20climate%20change%20and%20energy%20transition_0.pdf

experience of energy debt and how to further support those customers who need it.

CPP Debt Projects starting Year Two

Debt Project 1: Supplier audit and debt communication follow-up

The project will focus on two key areas:

- (1) Ability to pay: Ensuring repayment levels for those customers in debt are based on “ability to pay” principles.
- (2) Supplier communications: to examine and improve how suppliers are communicating with customers in debt.

Debt Project 2: Research on experience of debt (both credit and PPM)

The project will focus on

- (1) Qualitative research on lived experience of debt:
- (2) Exploring how to identify self-disconnection and how to best measure this, and
- (3) Establishing a Roundtable/Working Group to facilitate discussion on how to improve supplier approach and response to debt and how to support and educate consumers.

- Affordable energy is one of the key underpinnings of the CPP. Given the unprecedented rise in wholesale energy prices there is potential that consumers in financially precarious situations will be unable to heat their homes. Currently, some form of “Affordability” tariffs for essential services such as water, energy and even telecoms are available in GB. These are often tariffs offered at discounted price plans designed to support households that are in financial hardship. We are now proposing some exploratory work on Affordability tariffs to identify the potential for development of such plans for the NI energy market. This will be a priority for 2022.
- The pandemic has also accelerated the move to digital platforms across a wide range of services and service support. More companies are using digital channels for services, messaging, notifications and engagement with their customers. However, given that NI has the highest proportion of internet non-

users in the UK⁴ (14.2%) energy consumers here are at risk of being digitally excluded due to lack of access to opportunities, knowledge, goods and services. As part of our re-scoped CPP, we will explore the potential for a 'digital divide' with a view to protecting those who cannot, for whatever reason, access online services.

- To further ensure that the CPP projects developed and prioritised for delivery reflected the most pressing issues facing consumers, we held one to one meetings with stakeholders to identify what they considered to be the key priorities for the CPP. The CVWG were also provided with the opportunity to give their input into the prioritisation of CPP projects.
- It is now vital that the CPP addresses the consumer challenges which have been magnified by COVID-19. A re-scope of several CPP projects has therefore been completed and timelines have been revised.

⁴<https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/exploringtheuksdigitaldivide/2019-03-04#the-scale-of-digital-exclusion-in-the-uk>

3. Future project delivery

- A number of priority CPP projects were ongoing at the time of review or were due to commence in the near future and will be retained within this revised CPP ([Table 2](#)). Details of re-scoped and new projects, including those on debt are provided in Table 3. The proposed timelines for CPP projects are set out in Table 4.
- Given our limited resources and the inclusion of new debt projects, some areas of work have been reprioritised for delivery. Some of these areas of work will be taken forward in the context of the new Energy Strategy for NI and the remaining areas will be noted and included for reconsideration when the CPP is reviewed again in full. These projects are outlined in Table 5.

Table 2: CPP projects

CPP Project	Status	COVID-19 related learning points	Project details	Intended Outcomes
<p>Best Practice framework programme</p> <p>(Affordability)</p> <p>(Leadership and Engagement)</p>	<p>The call for evidence phase has been completed (2019). Due to the complexity of the programme, and to ensure it remains relevant to the current context, an extensive pre-consultation phase was undertaken with stakeholders. A consultation/approach paper has been developed and will be published Winter 2021/22.</p>	<p>Learnings have been incorporated into this programme of work to include issues such as how quickly people may find themselves in vulnerable circumstances, the need for improved mechanisms for identification of vulnerability, increased awareness of care registers, and the need for concise and timely customer communication in times of crisis.</p>	<p>The aim of this longer-term programme is to identify and establish the best practice measures that regulated companies in NI should have in place to identify, assist and protect consumers in vulnerable circumstances.</p> <p>The core building blocks to implementation include:</p> <ol style="list-style-type: none"> 1. Culture, ethos and staff training 2. Identification of vulnerability 3. Practical measures for those in need 4. Data collection and sharing 5. Monitoring, reporting and publication 	<ol style="list-style-type: none"> 1. Industry will operationalise our definition of vulnerability and it will become part of business as usual. 2. Industry will provide practical interventions to address some of the domestic consumer difficulties. 3. Industry and UR will explore the potential for data sharing to ensure more consistency in the number of vulnerable consumers signed up to care registers. 4. A new mandatory Code(s) of Practice will replace and update existing licence/code requirements. This code will apply to both network companies and suppliers. 5. We will monitor and review progress.
<p>Review electricity Guaranteed Standards of Service (GSS)</p> <p>(Empowerment through education and transparency)</p>	<p>Quantitative research has now been completed which provides an evidence base for decisions regarding GSS. A consultation paper has been drafted.</p>	<p>As the research took place during a period of lockdown, there may be COVID-related learnings regarding both domestic and non-domestic consumers.</p>	<p>GSS set out prescribed service levels which individual consumers can expect from electricity companies, including compensatory payment requirements when the company has failed to adhere to the standards (subject to certain</p>	<p>Enhanced levels of consumer protection will be offered to consumers in NI. Failure to comply with the levels of service required under the GSS/OSP regime may result in compensatory payments to individual consumers and/or potential enforcement action for persistent failures.</p>

CPP Project	Status	COVID-19 related learning points	Project details	Intended Outcomes
			exemptions). Overall Standards of Performance (OSP) set out general required standards that are not customer specific and do not carry a compensatory payment if breached. The GSS/OSP regime currently applies only the electricity distribution company in Northern Ireland (NIEN). This project aims to introduce a GSS/OSP regime for electricity supply companies in NI.	
Domestic Consumer Insight Tracker (Leadership and Engagement)	The next domestic insight tracker survey will be completed by the end of 2021/22.	We know that COVID-19 has had a material impact on the financial situation of many households. These surveys will be an opportunity to explore such issues and identify if the market is working well for domestic consumers.	The purpose of this survey is to monitor domestic consumer outcomes and behaviour in the NI domestic energy market over time. This survey will be conducted annually.	A solid evidence base in relation to the consumer experience in NI which enables us to fulfil our statutory duties in relation to protecting the interests of domestic consumers in relation to price and quality of service.
Non-domestic Consumer Insight Tracker (Leadership and Engagement)	2019-2020 survey has been completed and report published. We hosted a stakeholder briefing event to disseminate the findings. The next survey will be carried out in 2022/23.	We know that many non-domestic consumers have been impacted by COVID-19 pandemic. This survey will be an opportunity to continue to monitor the impacts on non-domestic consumers and identify how well the market is working.	The purpose of this survey is to monitor non-domestic consumer outcomes and behaviour in the NI non-domestic energy market over time. This survey will be conducted bi-annually.	A solid evidence base in relation to the non-domestic consumer experience in NI which enables us to fulfil our statutory duties in relation to protecting the interests of non-domestic consumers in relation to price and quality of service.

CPP Project	Status	COVID-19 related learning points	Project details	Intended Outcomes
<p>Deliver new published content to help educate/empower consumers and stakeholders about energy market and consumer outcomes</p> <p>(Empowerment through education and transparency)</p>	<p>Ongoing: following a re-scope, “Review energy consumer pathways to better deals” has been incorporated into this ongoing project. Digital exclusion has also been added as an additional CPP project in response to concerns around people potentially being disadvantaged with regards switching or accessing better deals.</p>	<p>We continue to develop and publish material for consumers to provide information on their queries about the impact of COVID-19 on their energy and water supplies. We are working with key stakeholders to ensure a collaborative approach to consumer information and messaging. We will continue working with the Consumer Council Northern Ireland (CCNI) to ensure consumers can identify the best deals available e.g. switching week/promotion of CCNI switching tool and engagement with the outreach team.</p>	<p>This is an ongoing project which will run throughout the CPP. We will continue to update the website, partner with stakeholders to share key information, and promote consumer information on social media.</p>	<p>Consumers will have timely access to information and support, to include information on consumer protections and practical support on how to get the best deals available. Our website will be user-friendly and accessible and continue to be updated.</p>
<p>Accessibility issues for consumers e.g. relocation of prepayment meters</p> <p>(Equal Access)</p>	<p>Ongoing: We have contributed to proposals for a new gas meter with enhanced functionality. The CVWG have also been provided with the opportunity to provide feedback on the proposals.</p>	<p>The accessibility issue was further exacerbated by the COVID-19 pandemic and concern was raised from stakeholders with regards to this.</p>	<p>In July 2020 we set up and managed a joint industry and statutory agency working group for gas consumers: the Gas Metering Solutions Group (GMSG). This project is now being actively addressed within the GMSG and a new gas meter is being developed.</p>	<p>New gas meters will be more accessible to all consumers and have enhanced functionality, overcoming the issues surfaced during the COVID-19 pandemic.</p>

CPP Project	Status	COVID-19 related learning points	Project details	Intended Outcomes
<p>Extension of Quick Check 101 to Electricity Suppliers (currently Network companies and gas suppliers only)</p> <p>(Equal access)</p>	<p>To commence Q4 2021/22</p>	<p>This project has been re-prioritised as a review is now due. In addition, meter reads etc. are returning and so people may need to avail of this scheme in the near future.</p>	<p>This scheme enables customers to phone a single dedicated phone number to verify the identity of someone who calls to their home claiming to be from a utility company. The line is operated by PSNI and calls are answered by trained police call handlers.</p>	<p>Improved level of certainty and security that vulnerable customers may feel when utility staff visit their homes.</p>

Table 3: New Consumer Protection projects

CPP Project	Status	COVID-19 related learning points	Project details	Intended Outcomes
<p>Supplier audit and debt communication follow-up (Affordability)</p>	<p>To re-commence</p> <p>This project was in the final stages of consultation development before the outbreak of COVID-19 but following consultation with stakeholders, it has now been enhanced to include considerations on ability to pay. The project will re-start towards the end of 2021.</p>	<p>There has been a material impact on the financial situation of many households and a potential debt crisis is possible. Consumer affordability issues have also been exacerbated.</p>	<p>The project will focus on two key areas:</p> <p>(1) Ability to pay: to examine if repayments for those customers in debt are based on ability to pay concepts (to include PPM and credit customers). This project will be expanded to assess outcomes of supplier PPM audits to enhance assessment of ability to pay.</p> <p>(2) Supplier communications: to examine how suppliers are communicating with customers in debt, identify if suppliers are doing enough to stop consumers getting into debt and whether they are assisting customers to get out of debt in the most appropriate way.</p>	<p>Customers in debt will have their ability to pay assessed effectively by suppliers. This will include setting repayment rates based on an individual's ability to pay, ensuring the customer has a clear understanding of the arrangements, the monitoring of the re-payment arrangement with the customer once it is in place, and checking-in with customers if there is a problem or a default with any repayments.</p> <p>Improved supplier debt communications with consumers who are in financial difficulty.</p> <p>Amount of debt overall to be reduced for domestic energy customers.</p> <p>Amount of domestic energy customers who are in debt to be reduced through improved management of review and communications by suppliers (including improved identification of vulnerability).</p>

CPP Project	Status	COVID-19 related learning points	Project details	Intended Outcomes
<p>Research on experience of debt (both credit and PPM) (Affordability)</p>	<p>This is a new project and following a re-scope, will include “Self-disconnection of PPM electricity and gas consumers”</p>	<p>Self-disconnection for prepayment customers has been identified as a priority project of the CPP. Due to the potential increase in the number of consumers in debt or struggling to pay for their energy, it is vital we develop an understanding of their lived experience in order to develop policies that will have the most impact.</p>	<p>This project will include qualitative research on lived experience of debt:</p> <ul style="list-style-type: none"> - Impact on life, coping mechanisms, experience of dealing with companies - Identify requirements to improve debt handling by suppliers <p>A Roundtable/Working Group will be established to facilitate discussion on how to improve supplier approach and response to debt. The qualitative research will help inform these discussions.</p> <p>It will also explore how to identify self-disconnection and how to best measure this. The support and education needed for such consumers will also be identified. All metrics we collect in relation to PPM will be reported on where relevant to build up a rich insight into the experience of PPM customers.</p>	<p>Identification of the lived experience of energy debt and the hidden cost of PPMs for consumers.</p> <p>Improved support and education for consumers who are at risk of self-disconnection. Customers will be better informed of what all suppliers must do in a clear and accessible way.</p> <p>Exploration of the potential for an Industry/Community and Voluntary pilot initiative to provide both financial and non-financial assistance to a cohort of vulnerable electricity and gas consumers.</p>

CPP Project	Status	COVID-19 related learning points	Project details following a re-scope	Intended Outcomes
<p>Scope development and introduction of affordability tariff</p> <p>(Affordability)</p>	<p>This project has been given a higher priority due to energy market volatility.</p>	<p>Based on affordability and debt learnings from COVID- 19 and the impact of increasing wholesale energy costs on domestic households, we have identified the need to explore the potential for affordability tariffs designed to support households that are in fuel poverty.</p>	<p>We currently anticipate that this project will comprise desk research and a literature review to identify and examine potential affordability tariff options for consumers in, or at risk of, fuel poverty in NI.</p>	<p>Consumers who are vulnerable and in, or at risk of fuel poverty will be protected from energy price hardship.</p>
<p>Digital exclusion</p> <p>(Equal Access)</p>	<p>This is a new project and following a re-scope “Review equality of access for consumers who have no access to a bank account and or no internet access” will be incorporated under this project.</p>	<p>There are growing concerns on digital exclusion, particularly in relation to the new NI Energy Strategy. This lack of access has the potential to act as a significant barrier to full engagement with the retail market in NI.</p> <p>Those who are offline without access to the internet due to financial reasons, a lack of physical access or a knowledge gap, are more likely to have difficulty engaging in markets and are more</p>	<p>This project will add ‘digital exclusion’ to the CPP agenda and ensure that consumers continue to be protected in a fast changing environment and do not suffer any detriment</p> <p>This project will evolve over the three years of the CPP including adding questions on digital access to the domestic insight tracker to help identify issues for exploration and development in the subsequent years.</p> <p>This project will be relevant across our Retail Directorate and our organisation as a whole and will include work with stakeholders such as CCNI, CVWG and UKRN to</p>	<p>Identification of:</p> <ul style="list-style-type: none"> (i) the level of digital access for consumers within NI and the impacts this may have on accessing support; (ii) the current services and mechanisms available to those consumers who do not have access to a bank account and no or limited access to the internet; (iii) the further protections which may be needed for those with a lack of digital access.

CPP Project	Status	COVID-19 related learning points	Project details following a re-scope	Intended Outcomes
		likely to be in vulnerable circumstances. This issue was highlighted during the COVID-19 pandemic when key communications on available supports had to be circulated in leaflet format.	progress.	
Seminar series (Leadership and engagement)	Started 2021 - 2022	It is important more than ever to identify and share best practice. It is important that the issues highlighted by the COVID-19 pandemic, and examples of good practice, are shared.	The aim of this seminar series is to bring together a range of interested groups from GB and NI to identify key areas in which learning can be shared to assist with implementation of the Best Practice Framework programme.	We will identify research, best practice and any regulatory considerations and disseminate this learning across NI with the ultimate goal of improving outcomes for consumers.
Exploration of the use of Inclusive Design (Leadership and engagement)	To commence: a paper was presented to our Board to inform them of this approach and the recent publication 'Inclusive design in essential services: a guide for regulators'	COVID-19 highlighted more than ever that there is a need to understand the needs of all consumers (particularly those who are vulnerable). The use of an inclusive design approach will be explored to help guide and set priorities for the consumer protection team.	This project will add 'Inclusive Design' to the CPP agenda and will ensure that it remains under consideration for further exploration when resources allow.	We will have a thorough understanding of Inclusive Design and how it could be incorporated into the CPP in the future

4. Moving forward with CPP

- Following the CPP review and re-scope, a decision was made by our Board to **extend the CPP over an additional two years** starting in 2021/22 (Year 1); 2022/23 (Year 2); and 2023/2024 (Year 3).

- **This extension will bring a number of advantages to include:**
 - (i) establishment of the required momentum to ensure the delivery of high quality and impactful CPP projects.
 - (ii) the alignment of the delivery of the CPP with the duration of our corporate strategy 2019-2024. This will ensure the CPP remains at the core of our work and at the same time help directly inform the development of the new corporate strategy.
 - (iii) an opportunity to ensure the CPP remains current in light of a rapidly changing landscape e.g. the energy transition and the new energy strategy for NI and the impacts of increased digitalisation.
 - (iv) development of a monitoring mechanism to ensure completed projects are delivering the intended outcomes.
 - (v) adequate time for an in-depth review in 2023 to ensure that the CPP has met the challenges that COVID-19 has created and exacerbated, and to help inform the development of the CPP from 2024 onwards.

Table 4: CPP project timescales

Project	Status	Year 1 (2021-2022)	Year 2 (2022-2023)	Year 3 (2023-2024)
• Best Practice Framework programme	Ongoing			
• Guaranteed Standards of Service	Ongoing			
• Domestic consumer insight tracker (to be repeated annually)	2021 survey commenced			
• Non-domestic consumer insight tracker survey (to be repeated bi-annually)	Next survey due 2022			
• Deliver new published content	Ongoing			
• Accessibility issues for consumers e.g. relocation of prepayment meters	Ongoing			
• Extension of Quick Check 101 (Stage 2)	To commence 2022			
• Consumer Debt				
a) Supplier audit and debt communications follow-up	New projects (re-scoped) to recommence			
b) Research on experience of debt (credit and PPM)				
• Affordability tariff	New Project (reprioritised)			
• Digital Exclusion	New project			
• Seminar Series	Addition to Best Practice			

- **Inclusive design**

New project

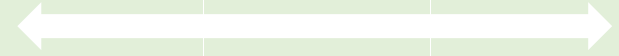


Table 5: Projects reprioritised for delivery via other vehicles

Proposed CPP Project	Intended outcomes
<p>Review existing processes and procedures for domestic customers switching supplier*</p> <p>(Affordability)</p>	<p>A review of existing processes and procedures for domestic customers switching supplier which will inform promotion of competition in the NI market.</p>
<p>Review energy efficiency Code of Practice requirements**</p> <p>(Affordability)</p>	<p>Consumers will be better informed about energy efficiency measures.</p>
<p>Scope and review the establishment of a universal utility care register***</p> <p>(Equal Access)</p>	<p>Evidence to inform the decision on development of a universal utility care register that both customers and utility companies can access.</p>
<p>Tenants' rights in relation to utility services</p> <p>(Empowerment through education and transparency)</p>	<p>Tenants are better informed of their rights and responsibilities in regards to utility services in NI.</p>

Notes:

*See recent 'Review of the NI energy market retail market' ⁵

** Issues may be explored further / addressed via the Northern Ireland Energy Strategy

*** Care register review is included in the Best Practice Framework programme.

⁵ <https://www.uregni.gov.uk/files/uregni/media-files/State%20of%20the%20market%20v1.0.pdf>