



Consumer Protection Programme 2024 – 2029

Final Decision Paper

27 March 2024



About Utility Regulator

Utility Regulator is the economic regulator for electricity, gas and water in Northern Ireland. We are the only multi-sectoral economic regulator in the UK covering both energy and water.

We are an independent non-ministerial government department and our main duty is to promote and protect the short-and long-term interests of consumers.

Our role is to 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.

We are based at Queens House in 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; and Markets and Consumer Protection.



Our mission

To protect the short- and long-term interests of consumers of electricity, gas and water.



Our vision

To ensure value and sustainability in energy and water.



Our values

- Be a best practice regulator: transparent, consistent, proportionate, accountable and targeted.
- Be professional – listening, explaining and acting with integrity.
- Be a collaborative, co-operative and learning team.
- Be motivated and empowered to make a difference.



Abstract

Utility Regulator's (UR) Consumer Protection Programme (CPP) plays a pivotal role in ensuring Northern Ireland consumers are protected. The CPP is a central element of UR's Corporate Strategy and is our principal vehicle to deliver positive outcomes for electricity, gas and water consumers in Northern Ireland.

The new programme, which will be delivered across a five-year period between 2024-2029 (CPP24), will run alongside our new Corporate Strategy. It includes a suite of bespoke projects aimed at enhancing consumer protection for all consumers. In addition, CPP24—for the first time—outlines our intended approach to enhance protection for non-domestic consumers as well as domestic, consumers in vulnerable circumstances and 'future' consumers.

We have developed a structured plan for years one to three which will take the programme up to a review period. We intend to be sufficiently agile within CPP24 and therefore at the end of year three we plan to conduct a mid-term review of the programme to ensure that we can develop workstreams and projects for the remaining two years that are relevant and responsive to consumer needs as they emerge.

Audience

This document is likely to be of interest to a wide range of stakeholders; including domestic consumers, non-domestic consumers, consumer bodies, advice and protection agencies, business representative organisations, energy suppliers and the wider energy industry.

Consumer impact

This is expected to have a positive impact on domestic and non-domestic electricity, gas and water consumers. The costs and benefits of each project will be identified during the scoping phases of the individual projects.



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1. Executive Summary

This paper contains UR's final decisions on our approach to the new Consumer Protection Programme (CPP). The CPP has been developed following engagement with UR Board and stakeholders, research into the key issues facing electricity, gas and water consumers, and a consultation process. It is a central element of our Corporate Strategy and is our principal vehicle to deliver positive outcomes for electricity, gas, and water consumers in Northern Ireland. The programme includes a suite of bespoke projects aimed at enhancing consumer protection for all consumers.

To achieve effective alignment with our new Corporate Strategy, the new CPP will be delivered across a similar five-year programme period between 2024 and 2029 (CPP24). To ensure that CPP24 is sufficiently agile to adapt to emerging challenges and changes, there will be a mid-term review of the programme which will be conducted at the end of year three. This will allow UR to develop workstreams and projects for the remaining two years that are relevant to consumer needs as they emerge.

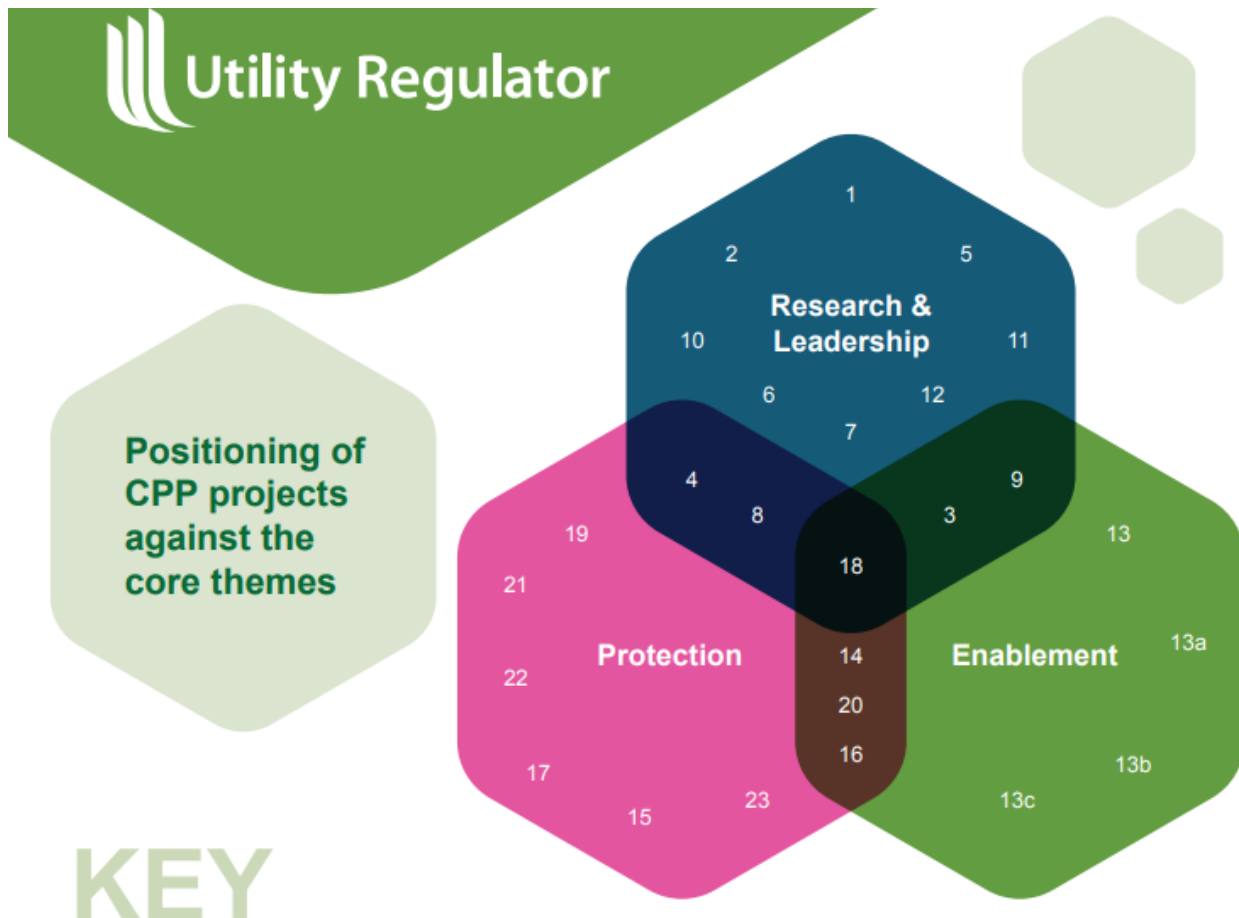
Within this paper we set out the delivery plan for projects for years one to three, which will take us up to the mid-term review period. In doing so, we have identified three core themes which will represent our approach to CPP24. These are as follows:

1. **Research and Leadership** – Providing evidence-based thought leadership in delivering the consumer protection policy agenda.
2. **Enablement** – Creating the frameworks and environment for domestic and non-domestic consumers to engage in a meaningful way with electricity, gas and water services.
3. **Protection** – Providing appropriate protection for domestic and non-domestic consumers who may need additional support to ensure they avail of the best-in-class electricity, gas and water services in Northern Ireland, both now and in the future.

Throughout the first three years of CPP24 we will deliver 23 projects, each of which will support the objectives of one or more of our core themes. We believe that this will strengthen the programme and should help ensure that it delivers improved outcomes for consumers. Details on each of the 23 planned projects are provided in Annex 1. For each project this includes what we intend to do and the desired outcomes. Planned timelines for the delivery of each project are detailed in Annex 2. Some of the projects in CPP24 will run on a repeat basis each year throughout the programme, whilst others will run continuously across one or more years.



Positioning of CPP24 projects against the core themes



KEY

Number	Project
1	Domestic Tracker
2	Non-Domestic Tracker
3	Energy Transition and Consumer Issues
4	Debt and Affordability (Outworking's of our lived experience energy debt research completed under the CPP 2021 -2024)
5	Private Rented Sector (Research)
6	Energy Literacy (Qualitative Research)
7	Consumer Experience of Smart Meter Rollout
8	Social Tariff (Evidence Base)
9	Supporting Just Transition to Net Zero
10	Establish Non-Domestic Energy Market Forum
11	Domestic Consumers Supplied by Non-domestic Contracts
12	Farming Sector (Engagement and Research)
13	Improving Energy Literacy
13a	Evaluation of consumer understanding
13b	Establish an energy literacy working group
13c	Develop Consumer Understanding of energy transition and emerging technologies
14	Plan for the Implementation of Smart Meters and Systems
15	Best Practice Framework (BPF) – Implementation of a new mandatory Code of Practice (COP) for Consumers in Vulnerable Circumstances
16	Best Practice Framework - Implementation of a new Customer Care Register (CCR) structure
17	Implementation of Updated Electricity Guaranteed Standards of Service (GSS) and Overall Standards of Performance (OSP)
18	Consumer Energy Charter (CEC) each Winter
19	Review of the Energy Supplier CoPs.
20	Company Vulnerability Strategies
21	Bereavement Support
22	Third Party Intermediaries (TPIs) in the Non-domestic Retail Market
23	Improving Non-domestic Consumer Experience



2. Introduction and background

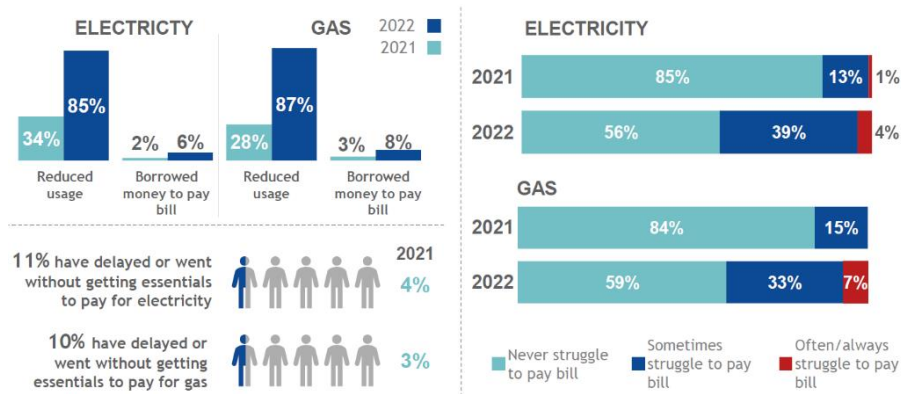
- 2.1 This paper contains UR's final decisions on the approach to our new Consumer Protection Programme for the delivery period 2024-29 (CPP24).
- 2.2 The approach in this paper has been developed following engagement with UR Board and stakeholders, research into the key issues facing electricity, gas and water consumers, and a consultation process.
- 2.3 UR's CPP plays a pivotal role in ensuring Northern Ireland consumers are protected. The CPP is a central element of our Corporate Strategy and is our principal vehicle to deliver positive outcomes for electricity, gas, and water consumers in Northern Ireland. The programme includes a suite of bespoke projects aimed at enhancing consumer protection for all consumers.
- 2.4 Launched in April 2019, the development and delivery of the initial CPP was deferred in June 2020 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, UR Board endorsed a proposal to review and re-scope the CPP in 2021 and to extend the duration of the programme to 2024. This allowed for the incorporation of lessons learned from the COVID-19 pandemic to support consumers during the cost of living crisis which closely followed the pandemic.
- 2.5 As an indication of UR's ongoing commitment to protecting all consumers, a renewed focus has now been placed on prioritising consumer protection within the organisation. This commitment is reflected by the inclusion for the first time of non-domestic consumers as well as domestic, consumers in vulnerable circumstances and 'future' consumers within CPP24.
- 2.6 In addition to decarbonisation and Just Transition, affordability concerns for all consumers also remain a significant driver for our work.
- 2.7 UR's Domestic Consumer Insight Tracker is carried out annually with energy consumers in Northern Ireland to provide a statistically robust evidence base on consumer experiences of the energy market. The most recent data collected between October and November 2022, published in April 2023¹, found a substantial increase in the amount that consumers in Northern Ireland were spending on their energy each month and notable increases in the proportion of consumers who were struggling to pay for their energy.
- 2.8 There were also increases in the proportion of consumers who were going without other essentials to pay for their gas or electricity bills, borrowing

¹ [Domestic Consumer Insight Tracker 2022 | Utility Regulator \(ureg.gov.uk\)](https://www.ureg.gov.uk/domestic-consumer-insight-tracker-2022)



money to pay for their energy and reducing their use of electricity and gas. Consumers who were highly vulnerable were more likely to be struggling to pay for their energy bills as well as presenting with other indications of financial distress. Figure 1 below provides some of the data from the tracker.

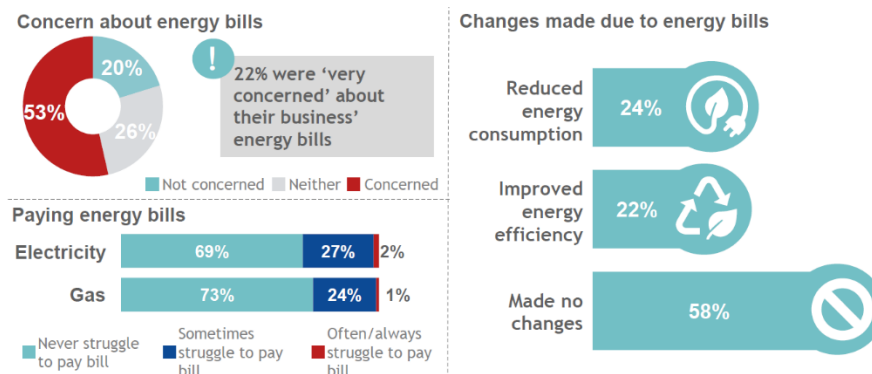
Figure 1: Northern Ireland domestic energy consumer landscape (2022)



2.9 UR’s Non-domestic Consumer Insight Tracker is carried out every two years. The most recent survey was carried out between December 2022 and January 2023 and was published in May 2023². It provides a representative sample of non-domestic consumers in Northern Ireland.

2.10 Over half (53%) of non-domestic consumers were found to be concerned or very concerned over their energy bills, with the hospitality sector the most likely to be concerned. It was found that 29% of non-domestic electricity and 25% of non-domestic gas consumers said they struggle to pay bills. Figure 2 below shows some of the data from the tracker.

Figure 2: Northern Ireland non-domestic energy consumer landscape (2022/23)



² [Non-Domestic Tracker Final report | Utility Regulator \(ureg.gov.uk\)](https://www.ureg.gov.uk/non-domestic-tracker-final-report)



- 2.11 However, most non-domestic consumers said they had made no changes to behaviour due to energy prices and a high proportion were unaware of how much they spend on both (33% electricity and 41% gas).
- 2.12 In December 2023, UR published the “Consultation on the Consumer Protection Programme 2024-2029”³. The UR received 11 written responses to the consultation paper. Non-confidential submissions were received from the following organisations:
- Power NI
 - Budget Energy
 - Electric Ireland
 - SSE Airtricity
 - Firmus Energy
 - Northern Ireland Electricity Networks
 - Northern Ireland Water
 - Christians Against Poverty
 - Plain Numbers
 - National Energy Action
 - Consumer Council for Northern Ireland
- 2.13 A copy of each respondent’s full submission has been published alongside this paper and can be found on our website - [Utility Regulator \(uregni.gov.uk\)](https://www.uregni.gov.uk).
- 2.14 This paper sets out UR’s final decisions on CPP24 and provides a detailed delivery plan for the projects for years one to three. Given the challenges that consumers face in this ever-changing environment, we are mindful of the role that CPP24 will have in protecting Northern Ireland consumers both now and in the future.

³ https://www.uregni.gov.uk/files/uregni/documents/2023-12/ CPP%20Consultation_FINAL.pdf



3. Consumer Protection Programme 2024 – 2029 - Final Decisions

3.1 In the section we summarise the consultation responses as well as UR's final decisions in each area.

Scope

UR Consultation

3.2 In defining the direction for CPP24 we wanted to highlight that our new programme will continue to ensure high quality projects and workstreams to protect domestic consumers and those in vulnerable circumstances, and explicitly identifying how we will seek to include protection of both non-domestic consumers and 'future' consumers.

3.3 UR identified three core themes which will represent our approach to CPP24. These new themes incorporate the aims of the previous CPP's (four) objectives. Consideration is also given to the feedback received from stakeholder engagement as well as the overall strategic direction of UR and the Northern Ireland Government's work on the Climate Change Act (Northern Ireland) 2023.

3.4 The core themes identified for CPP24 were as follows:

1. **Research and Leadership** – Providing evidence-based thought leadership in delivering the consumer protection policy agenda.
2. **Enablement** – Creating the frameworks and environment for domestic and non-domestic consumers to engage in a meaningful way with electricity, gas and water services.
3. **Protection** – Providing appropriate protection for domestic and non-domestic consumers who may need additional support to ensure they avail of the best-in-class electricity, gas and water services in Northern Ireland, both now and in the future.

Consultation Responses

3.5 There was agreement amongst stakeholders who responded to our consultation that the themes identified within CPP24 were appropriate.

3.6 Consumer bodies were keen to stress that the impact of high energy prices and the ongoing cost of living crisis means that affordability issues remain a significant challenge for consumers, and that this should be reflected within the work plan of the CPP24.



- 3.7 One supplier felt it was important for UR to provide a more detailed work plan with clear timelines to ensure effective implementation of CPP24 and to allow UR to measure progress accurately.

UR Decision

- 3.8 It is the decision of UR that CPP24 will proceed with the core themes as identified.
- 3.9 UR recognises the impact that high energy prices have on consumers and remains fully committed to tackling affordability issues. It is our intention to address affordability through various projects across each of the core themes in CPP24. For example, through the outworking's of our lived experience energy debt research, we will work with suppliers to improve their approach and response to consumers in debt.
- 3.10 Further information on each of the projects planned for delivery in years one to three has been provided in Annex 1. A delivery plan for years one to three of CPP24 is provided in Annex 2. Additional details of each project will be provided to stakeholders during the development phase of each project.

Duration

UR Consultation

- 3.11 In the consultation paper we outlined our plan to deliver CPP24 across a five-year programme period between 2024 and 2029. Doing so ensures that the programme is aligned with the new UR Corporate Strategy which has the same duration.
- 3.12 To ensure that CPP24 is sufficiently agile to adapt to emerging challenges and changes, we also proposed to include a mid-term review of CPP24 which would be conducted at the end of year three. This will allow UR to develop workstreams and projects for the remaining two years that are relevant to emerging consumer needs.

Consultation Responses

- 3.13 Respondents indicated support for a five-year programme period with a review built into year three.
- 3.14 One supplier suggested that UR should have the added flexibility to allow for a special review at any time throughout the programme should there be significant change in external factors that could result in a change in the needs of consumers.
- 3.15 Another supplier expressed some concern over the lack of a contingency



plan should progress not be made. They stated that they would welcome a framework with more periodic assessment and suggested a light touch annual review as an option.

UR Decision

- 3.16 It is the decision of UR that the five-year duration and planned review period of CPP24 will remain unchanged from the consultation. It is the view of UR that this will provide the required flexibility to deliver the programme effectively. There will be periodic assessments of the status of all of the CPP24 projects, and the annual review will be reported on as part of the UR Forward Work Plan review process.
- 3.17 As demonstrated with the previous CPP, due to urgent COVID-19 service delivery issues, our Board endorsed a proposal to review and re-scope the CPP. Likewise, CPP24 is designed to be a flexible programme that can adapt to fit changing circumstances when necessary.

Theme 1: Research and Leadership

UR Consultation

- 3.18 We proposed that a key tenet of CPP24 would be to provide a sound evidence base to enable positive policy outcomes for current and future consumers. This will provide leadership and direction in developing appropriate consumer protections for both domestic and non-domestic consumers via our existing legislative and statutory framework.
- 3.19 **Domestic and Non-domestic Insight Tracker** - We proposed to continue our robust research programme during CPP24 which will be used to provide evidence-based planning and decision-making for domestic and non-domestic consumers and will also enable comparisons over time. This will include the continuation of our core quantitative research vehicles: the Domestic Insight Tracker and the Non-domestic Insight Tracker.
- 3.20 **Energy Transition and Consumer Issues** - We consulted on continuing to develop our research into the energy transition. This will inform future workstreams to support Just Transition, as well as providing important insight to support development of wider government policy.
- 3.21 **Energy Literacy (Qualitative Research)** - We outlined our plan to conduct qualitative research with consumers to develop an in-depth understanding of energy literacy issues and how these can be addressed in relation to both the current energy market (for example understanding of bills, energy usage, comparing deals and consumer protections) and the future market and Just Transition (for example decarbonisation, new technologies, barriers and



concerns). This research will allow UR to establish a baseline of energy literacy amongst consumers in Northern Ireland. It will also inform our understanding of any barriers or issues consumers face that reduce their ability to engage within the energy market and Just Transition.

3.22 Debt and Affordability - Following on from our lived experience research with consumers struggling to pay for their energy that has been conducted under our current CPP, we proposed to continue to lead in building a usable evidence base around consumer experiences of debt and affordability. To achieve this, we proposed to establish a working group with relevant stakeholders to facilitate discussion on:

1. How to improve supplier approach and response to debt; and
2. How to best support and educate consumers regarding debt and affordability related issues.

The working group would facilitate improvement in the supplier's approach and response to dealing with debt and affordability related issues. This will include improving how suppliers communicate with consumers who are experiencing financial difficulty, reviewing supplier debt recovery processes and identifying the best ways to support consumers.

Through the working group and using the outcomes of the lived experience research, we would also explore how to identify self-disconnection as well as the support and education needed for consumers at risk of self-disconnection.

3.23 Private Rented Sector - Domestic consumers who live in private rented sector (PRS) accommodation have been identified as a group of consumers that could experience detriment, both currently and throughout the move to net zero. We therefore proposed to undertake a research project to explore the experiences of domestic electricity and gas consumers who live in PRS accommodation. This research will allow us to establish a baseline of the potential issues and impacts that are experienced by these consumers. This will include experiences of engagement with the energy market and with Just Transition. The research will be used to inform the development of policies to support enhanced protection of vulnerable consumers living in the PRS.

3.24 Consumer Experience of Smart Meter Rollout - Consumer needs must be core to the development of Smart Metering and to support this UR outlined work with the Department for the Economy (DfE) on performing cross-jurisdictional research on the consumer experience and lessons learnt to help provide an essential focus on the consumer experience in the high-level design of Smart Meters in Northern Ireland. The outcomes of the research will enhance understanding of the impacts that Smart Metering will have on



consumers and will identify what actions need to be taken to enable Smart Meters to be introduced with the consumer as the focus, maximise the benefits, and avoid any potential harms in advance of the introduction of Smart Meters in Northern Ireland.

Consultation Responses

- 3.25 There was broad support for an evidence-based approach to the development of policy amongst respondents to the consultation on CPP24.
- 3.26 One supplier suggested that supporting active consumers should be the focus to protect consumers during the energy transition. They said they *“believe that the granular research focused on affordability is of less importance, not because it is less of an issue for consumers but rather because the active steps, we as an industry should be focusing on is a modern, active customer enabled system that empowers customers to meet their energy needs in different ways which will ultimately protect consumers in the long-term.”*
- 3.27 A consumer body stated that CPP24 could contain more information on how UR will demonstrate leadership. They cited research which highlights that consumers are concerned about high energy prices, rising fuel poverty and are seeking leadership in the drive towards net zero.
- 3.28 Another consumer body stated that they were encouraged that the PRS has been highlighted as an area for attention and that they would like to see this progress alongside work to tackle self-disconnection issues amongst consumers with a Pre-Payment Meter (PPM). They also believed that UR should show leadership by supporting the development of the social tariff debate through building an evidence base and exploration of operational models for the introduction of social tariffs in Northern Ireland.

UR Decision

- 3.29 It is the decision of UR to proceed with all of the projects outlined in the consultation paper. It is the view of UR that the identified projects target the areas most pressing in terms of consumer needs, demonstrate leadership and are deliverable within the timeframe of CPP24.
- 3.30 In addition, based on the consultation responses, further stakeholder engagement and supplementary input obtained from concurrent workstreams (e.g. Review of Non-domestic Regulation) we will also be adding a further five projects outlined below.
- 3.31 **Social Tariff (Evidence Base)** - We agree that UR can demonstrate leadership by supporting the discourse around the introduction of social



tariffs. In 2023, the UK Government made a commitment to consult on a social energy tariff to protect vulnerable consumers. If adopted there would be an expectation for a similar approach in Northern Ireland. In anticipation of this policy area progressing, we will seek to develop a trusted and impartial evidence base to support policy and decision makers in Northern Ireland, to evaluate the need for social tariffs and how they might operate.

- 3.32 **Supporting Just Transition to Net Zero** - As outlined in the Corporate Strategy and the Forward Work Programme (FWP), UR is committed to supporting Just Transition to net zero. In doing this we must seek to understand through stakeholder engagement; (i) Consumer expectations around Just Transition, (ii) The role UR can play in embedding Just Transition principles and, (iii) Potential new vulnerabilities for consumers that might arise as part of the energy transition and ways in which these can be mitigated. We will undertake a project in CPP24 to help develop our understanding in relation to these areas which will include defining options for future work that will progress Just Transition in Northern Ireland.
- 3.33 **Establish Non-domestic Energy Market Forum** - We will establish a regular non-domestic energy market forum with relevant stakeholders to facilitate discussion on the experience of non-domestic consumers, as well as pertinent market information and UR work relevant to non-domestic consumers.
- 3.34 **Domestic Consumers Supplied by Non-domestic Contracts** - To improve our understanding of the various types of domestic consumers being supplied by non-domestic contracts, we will undertake research to evaluate both the types and number of these consumers; and the impacts or additional challenges that domestic consumers supplied by non-domestic contracts might face.
- 3.35 **Farming Sector (Engagement and Research)** - We will also undertake a program of work to develop our understanding of the farming sector's engagement and experiences with the utilities market, including the identification of any issues faced. This project will help UR identify and remedy any potential gaps in the existing regulatory framework for these customers to ensure fair engagement and outcomes in the retail energy market for the farming sector.



Overview of Projects Under the Research and Leadership Theme

- Domestic and Non-domestic Insight Trackers
- Energy Transition and Consumer Issues
- Debt and Affordability
- Private Rented Sector
- Energy Literacy (Qualitative Research)
- Consumer Experience of Smart Meter Rollout Social Tariff (Evidence Base)
- Supporting Just Transition to Net Zero
- Establish Non-domestic Energy Market Forum
- Domestic Consumers Supplied by Non-domestic Contracts
- Farming Sector (Engagement and Research)

Theme 2: Enablement

UR Consultation

- 3.36 **Improving Energy Literacy** - In the consultation paper, we proposed a project on improving energy literacy, which encompasses a consumer's ability to access energy related information, to understand this information and to use this information.

We proposed to conduct research to assess the levels of energy literacy across all consumer groups. This research would be used to inform the design of a programme to help develop energy literacy and work to implement this in partnership with stakeholders.

The energy literacy project will also play an important role in supporting consumers throughout the Energy Transition. Through the project we are proposing to work with utility providers to ensure that consumers receive the right information in terms of new and emerging technologies. This would help consumers to be informed and empowered to achieve positive outcomes.

- 3.37 **Plan for Implementation of Smart Meters and Systems** - UR proposed to continue to work in partnership with DfE on the plan for the implementation of Smart Meters and systems over the next five years. This work would ensure that Smart Meters can be introduced with the consumer as the focus, maximising the benefits, and avoiding any potential harms in advance of the introduction of Smart Meters in Northern Ireland.

Consultation Responses

- 3.38 Most of the respondents to our consultation were supportive of the projects outlined under this theme.



- 3.39 One supplier was keen to understand what the programme for improving energy literacy will look like and how it will be delivered. They stressed that tackling energy literacy is a bigger challenge than what any one supplier can address, and that it should therefore be addressed through a consistent and sustained education programme led by government departments and consumer groups.
- 3.40 Several respondents sought further clarity on the delivery plans for the energy literacy programme, the nature of the role of the UR and the role of their stakeholders in the programme. Others provided suggestions for inclusion in the development of an energy literacy programme, with one consumer body saying that UR should consider following the Financial Conduct Authority's (FCA) lead and shift towards requiring communications that enable customer understanding and thereby leading customers to make informed choices.
- 3.41 A consumer body was supportive of this theme and the projects outlined within it but stressed the importance of ensuring that work undertaken is done so in a collaborative manner that complements existing education, enablement and empowerment activities.
- 3.42 On Smart Metering a supplier noted that due to high electricity costs and the impact this has on consumers bills, UR and DfE should look creatively at Smart Meter funding rather than pass the cost through on consumer bills.

UR Decision

- 3.43 It is the decision of UR to proceed with all the projects outlined in the consultation paper. UR welcome the input from respondents on the energy literacy programme and will consider all comments during development of this workstream. We are fully committed to working collaboratively in the delivery of the projects in CPP24.
- 3.44 Further details on the delivery of the energy literacy programme will be provided to all stakeholders following the project development phase.
- 3.45 In terms of Smart Meter implementation, the issue of cost will be considered through that bespoke workstream, and UR will work with DfE to ensure the most cost-effective approach for consumers is adopted.



Overview of Projects Under the Enablement Theme

- Improving Energy Literacy
 - Evaluation of consumer understanding
 - Establish an energy literacy working group
 - Develop consumer understanding of Energy Transition and emerging technologies
- Plan for the Implementation of Smart Meters and Systems

Theme 3: Protection

UR Consultation

3.46 As well as enabling and empowering consumers, we need to ensure that the frameworks to protect consumers are in place and are fit for purpose. Appropriate consumer protection ensures the fair and responsible treatment of consumers, especially those who, due to specific circumstances, are not able to navigate energy and water services easily themselves.

3.47 **Best Practice Framework (New Code of Practice)** - In the consultation, we outlined our intention to deliver our Best Practice Framework (BPF) programme outcomes following on from consultations during the CPP for 2021 to 2024. The BPF programme is a combination of principles and measures which electricity, gas and water suppliers and distribution network companies in Northern Ireland must implement to better identify, support and protect consumers in vulnerable circumstances.

Through the BPF, we will introduce licence modifications to implement a new mandatory Code of Practice (CoP) for consumers in vulnerable circumstances to apply to all suppliers and Distribution Network Operators (DNOs) across electricity, gas and water. The new CoP will consist of a combination of ten high level principles, supported by industry specific required measures.

We also proposed to introduce a new wider 'vulnerable' definition into licences (and the new CoP) to be used by regulated companies in Northern Ireland to identify and support consumers in vulnerable circumstances across all of their operations where there are requirements regarding vulnerability.

3.48 **Best Practice Framework (Update Customer Care Register)** - Through the BPF, we will implement the following changes to the current Customer Care Register (CCR) structure:



1. The implementation of a single CCR for electricity, gas and water.
2. The introduction of a two-tiered CCR structure with the top-tier being for medical care and the second being needs based.

The new CCR structure will help to ensure consistency of support and services available for vulnerable consumers across electricity, gas and water. Changes to the CCR structure will have the benefits of making it easier and less confusing for consumers to sign up for additional supports across utilities. Changes will also ensure that consumers are receiving the appropriate support specific to their needs by moving to a two-tiered register (both medical and needs based).

3.49 Implementation of Updated Electricity GSS and OSP - In the consultation we proposed to continue to work on enhancing protection and service standards for consumers through the implementation of updated Electricity Guaranteed Standards of Service (GSS) and Overall Standards of Performance (OSP). This follows on from our review of electricity GSS and OSP proposals consultation.

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 exemptions). OSPs set out general required performance targets that apply to the overall customer base and do not carry a compensatory payment if breached.

The introduction of a GSS/OSP review regime will enhance standards and protections for all consumers. 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.

3.50 Consumer Energy Charter - We also proposed to continue to engage with stakeholders to review the Consumer Energy Charter commitments ahead of the winter period, each year, to ensure each charter continues to provide effective additional support and enhanced protections to consumers.

3.51 Review of the Energy Supplier Codes of Practice - We proposed to review each of the existing supplier CoPs and update them accordingly to ensure that they are fit for purpose. We believe that doing so will enhance standards of service and protections for consumers.

3.52 Company Vulnerability Strategies - In the consultation we proposed to set a requirement for electricity, gas and water companies to develop,



implement and report on a vulnerability strategy for their organisation. It is our view that vulnerability strategies will ensure that consumer protection is given primary consideration at Board level within company decision making, embedding of such considerations within the company culture and providing accountability at a strategic level. We would support this by highlighting best practice examples of vulnerability strategies and provide a framework of requirements which should be met within a strategy.

- 3.53 **Bereavement Support** - We also proposed to strengthen protections for consumers who have been recently bereaved. This would include the implementation of requirements in relation to closing accounts with their suppliers, returning of any credit, switching tariffs (if a plan no longer meets the households needs following a bereavement), training of staff, and dedicated call lines and email addresses.

Consultation Responses

- 3.54 Consumer bodies were very supportive of this theme and the projects identified within it.
- 3.55 One consumer body highlighted the ongoing challenges vulnerable consumers face due to high energy prices, fuel poverty and the cost-of-living crisis. They therefore consider affordability to be a key issue and welcome the commitment to explore issues around self-disconnection.
- 3.56 Another consumer body was supportive of the projects under this theme and believe that given the level of consumer need at this time it is important that their powers are used to complement the powers of UR in protecting consumers. They suggest that the review of the existing CoPs should be prioritised.
- 3.57 Suppliers, whilst being broadly supportive of the theme, did present some concerns.
- 3.58 One supplier noted that there are a substantial number of workstreams under this theme and that it might be beneficial for UR to focus on a smaller number of projects to be delivered in the five-year period. They ask UR to ensure the projects are clearly mapped out in a timeline to ensure appropriate resources from all stakeholders can be allocated to dedicated workstreams.
- 3.59 Another supplier expressed a concern around the work proposed to be undertaken as part of the project to address self-disconnection and improve supplier approach and response to debt. They argued that their processes are already quite robust and involve several attempts to engage with customers from a dedicated team. They stated that there are limitations in



the ability of a supplier to help.

- 3.60 A third supplier expressed concerns over the creation of a single customer register, the broader definition of vulnerability and the lack of detail with regards to some of the proposed projects. They have asked that UR considers the views and feedback provided in response to the BPF when making any determination in relation to CPP24.

UR Decision

- 3.61 It is the decision of UR to proceed with all the projects outlined in the consultation paper. UR notes the concerns about the number of workstreams within this theme. However, it is our view that the projects are appropriately spaced to allow for delivery during the programme period. We have provided a project delivery plan timeline for CPP24 in Annex 2 which will allow stakeholders to map out resources needed.
- 3.62 In terms of the concerns in relation to the project to address self-disconnection and improve supplier approach and response to debt, it is UR's view that the importance of this work means that it should be progressed during CPP24.
- 3.63 UR has also considered the feedback provided in response to the BPF when making the final decisions in relation to CPP24.
- 3.64 In addition to the above projects, based on consultation responses, stakeholder engagement and supplementary evidence from concurrent workstreams (e.g. Review of Non-domestic Regulation) we will be adding the projects outlined below:
- 3.65 **Third Party Intermediaries** - Responses to our December 2023 Call for Input (CfI) regarding the 'Review of the Regulation of the Non-domestic Energy Retail Market'⁴ identified several options related to Third Party Intermediaries (TPIs) and consumer protection issues. We intend to explore these options—amongst others—and determine their suitability for the Northern Ireland market. We will undertake a project to develop our understanding of the operation of TPIs in the Northern Ireland non-domestic energy retail market. This will include exploring a range of potential options to increase consumer understanding of TPIs as well as ensuring a sufficient and consistent level of protection.
- 3.66 **Improving Non-domestic Consumer Experience** - Responses to the December CfI also identified several areas where non-domestic consumers were being impacted adversely. This included—but was not limited to—

⁴ [Call for Input - Review of the Regulation of the Non-Domestic Energy Retail Market | Utility Regulator \(uregni.gov.uk\)](https://www.uregni.gov.uk/call-for-input-review-of-the-regulation-of-the-non-domestic-energy-retail-market)



areas such as tariff transparency and unfair contract terms. We will explore whether a range of options can mitigate these issues and improve the overall experience of non-domestic consumers.

Overview of Projects Under the Protection Theme

- Best Practice Framework (New Code of Practice)
- Best Practice Framework (Update Customer Care Register)
- Implementation of Updated Electricity GSS and OSP
- Consumer Energy Charter each Winter
- Review of the Energy Supplier CoPs
- Company Vulnerability Strategies
- Bereavement Support
- Third Party Intermediaries
- Improving Non-domestic Consumer Experience



4. Conclusion and Next Steps

- 4.1 UR welcomes the endorsement of the aim and core themes of CPP24 by consultees and their recognition that implementation of the programme will result in positive outcomes for consumers.
- 4.2 Following the publication of this paper, UR will work to ensure the efficient delivery of CPP24. UR will work closely with stakeholders through a series of formal and informal platforms to ensure projects are effectively implemented.
- 4.3 Throughout the first three years of the CPP, UR will deliver 23 projects, each of which will support the objectives of one or more of our core themes.
- 4.4 In the previous sections of this paper, we have detailed these projects under each of the core themes that represent our approach to CPP24. However, in practice many of these of these projects support more than one of our core themes. For example, the implementation of a new CCR structure through the BPF will primarily serve to improve protections for vulnerable consumers; but the adoption of the new structure will also help promote the existence of care registers and therefore make it easier for consumers to sign up to them, thus also supporting the enablement theme.
- 4.5 Figure 3 details the overlapping nature of our planned CPP24 projects. We believe that this strengthens the programme and should help ensure that it delivers improved outcomes for consumers.
- 4.6 In Annex 1 we provide additional detail on each of the 23 projects that are planned for delivery throughout years one, two and three of CPP24. This includes what we intend to do within the project and what we see are the desired outcomes.
- 4.7 Annex 2 details our planned timelines for the delivery of each project. Please note, some projects will run on a repeat basis throughout the 3-year period, whilst others will run continuously.
- 4.8 In line with our Corporate Strategy, UR will track the progress in delivering our CPP24 projects on an annual basis and report on this publicly to support the FWP Annual Report.



Annex 1: Projects under CPP24

Project Ref	Project Name	Primary Theme	What we will do	Desired Outcomes
1	Domestic Insight Tracker	Research & Leadership	<p>The purpose of this survey is to monitor domestic consumer outcomes, awareness and behaviour in the Northern Ireland domestic energy market over time.</p> <p>Themes covered in the tracker include payment difficulties, interactions with energy suppliers, consumer protections and support services.</p> <p>This survey will continue to be conducted annually to establish trends.</p>	<p>The Domestic Insight Tracker will continue to develop our evidence base in relation to the consumer experience in Northern Ireland. This enables us to fulfil our statutory duties in relation to protecting the interests of domestic consumers regarding price and quality of service.</p>
2	Non-domestic Insight Tracker	Research & Leadership	<p>The purpose of this survey is to monitor non-domestic consumer outcomes and behaviour in the Northern Ireland non-domestic energy market over time.</p> <p>Themes covered in the tracker include billing, contracts and financial issues; understanding of the energy market; switching; communication and methods of contact; complaint handling; satisfaction with services provided; and energy efficiency, renewables and decarbonisation</p> <p>This survey will continue to be conducted bi-annually to establish trends.</p>	<p>The Non-domestic Insight Tracker will establish a trend of non-domestic consumer outcomes, attitudes, and experiences in relation to energy markets. This will provide important evidence to help facilitate the development of appropriate protections for non-domestic consumers.</p>
3	Energy Transition and Consumer	Research & Leadership	<p>We will build on our research into consumer understanding and awareness of net zero and Just Transition.</p>	<p>Building on previous research, this will inform future workstreams to support Just Transition, as well as provide important</p>



	Issues			insight to support development of government policy.
4	Debt and Affordability (Outworking's of our lived experience energy debt research completed under the CPP 2021 - 2024)	Research & Leadership/ Protection	<p>We will establish a roundtable working group on debt and affordability with relevant stakeholders to facilitate discussion on:</p> <p>(i) How to improve supplier approach and response to debt.</p> <p>(ii) How to best support and educate consumers regarding debt and affordability related issues.</p> <p>We will use the outcomes of the qualitative research on energy debt and affordability to help us explore how to identify self-disconnection and how best to measure it. The support and education needed for such consumers will also be identified.</p>	<p>The working group will facilitate improvement in the suppliers' approach and response to dealing with customers in debt and affordability related issues. This will include:</p> <ul style="list-style-type: none"> Improving how suppliers communicate with consumers who are experiencing financial difficulty. This will include both the language used and the communication approach adopted. Reviewing supplier debt processes. <p>The working group will help identify the best way to support and to educate consumers. It will also encourage a standardised and best practice approach across the utilities which will support improved outcomes for consumers across the board.</p> <p>Suppliers will have increased awareness of how to identify consumers at risk of self-disconnection and will be better able to establish timely contact and therefore offer support to those who are most at risk.</p> <p>This will help protect some of the most</p>



				vulnerable consumers from disconnection. Enhanced support and education needed for such consumers will also be identified.
5	Private Rented Sector (Research)	Research & Leadership	We will undertake a research project to explore the experiences in the energy market of domestic electricity and gas consumers who live in PRS accommodation.	<p>We will establish a baseline of the potential issues and impacts that are experienced by consumers who live in the PRS. This will include experiences of engagement with the energy market and with Just Transition.</p> <p>The research will be used to inform the development of policies to support enhanced protection of consumers living in the PRS.</p>
6	Energy Literacy (Qualitative Research)	Research & Leadership	Qualitative research with consumers to develop an in-depth understanding of energy literacy issues and how these can be addressed in relation to both the current energy market (for example understanding of energy bills, energy usage, comparing deals/contracts, switching and consumer protections) and the future market and Just Transition (for example decarbonisation, new technologies, barriers and concerns).	This research will allow us to establish a baseline of energy literacy amongst consumers in Northern Ireland. It will also inform our understanding of any barriers or issues consumers face that reduce their ability to engage within the energy market and Just Transition.
7	Consumer Experience of Smart Meter Rollout	Research & Leadership	Consumer needs must be core to the development of Smart Metering and to support this UR will work with the Department for the Economy (DfE) on performing cross-jurisdictional research on the consumer experience and lessons learnt to help provide consumer centric approach to the high-level design of Smart Meters in Northern Ireland.	The outcomes of the research will enhance our understanding of the impacts Smart Metering will have on consumers and will also identify what actions need taken so Smart Meters can be introduced with the consumer as the focus, maximise the benefits, and avoid any potential harms in advance of the



			This will be delivered through qualitative research interviews with key policy and decision makers involved in the rollout of Smart Meters in other jurisdictions.	introduction of Smart Meters in Northern Ireland.
8	Social Tariff (Evidence Base)	Research & Leadership/ Protection	In 2023, the UK Government made a commitment to consult on a social energy tariff to protect vulnerable consumers. If adopted there would be an expectation for a similar approach in Northern Ireland. This project will seek to develop a trusted and impartial evidence base to support policy and decision makers in Northern Ireland, evaluate the need for social tariffs and how they might operate.	Development of an evidence base which will be used to support informed debate on the possible implementation of social tariffs in Northern Ireland.
9	Supporting the Just Transition to Net Zero	Research & Leadership	There is a body of work required to: <ul style="list-style-type: none"> 1) Understand consumer expectations around the Just Transition; 2) Understand the role UR can play in embedding Just Transition principles; and 3) Identify potential new vulnerabilities that might arise due to the energy transition and consider ways in which these can be mitigated. 	Consumers will be supported and empowered to take advantage of the energy transition through the full implementation of Just Transition principles.
10	Establish Non-Domestic Energy Market Forum	Research & Leadership	We will establish a regular non-domestic energy market forum with relevant stakeholders to facilitate discussion on: <ul style="list-style-type: none"> (i) The experience of non-domestic consumers (ii) Market information and UR work relevant to 	A regular market forum with a focus on non-domestic matters will provide relevant stakeholders the opportunity to discuss ongoing and emerging issues within the market with UR and other parties.



			non-domestic consumers	Relevant and up to date information can be more easily distributed and discussed within the forum.
11	Domestic Consumers Supplied by Non-domestic Contracts	Research & Leadership	<p>To improve our understanding of the various types of domestic consumers being supplied by non-domestic contracts, we will undertake research to evaluate both the types and number of these consumers; and the impacts or additional challenges that domestic consumers supplied by non-domestic contracts might face.</p> <p>This project will seek to expand our knowledge base in this area and identify key issues (if any) for these consumers.</p>	We undertake research which will improve our understanding of these consumers and, if required, develop an evidence base to allow the development of future projects to ensure these consumers are adequately protected.
12	Farming Sector (Engagement and Research)	Research & Leadership	<p>We aim undertake a program of work to develop our understanding of the farming sector's engagement with the utilities market, including the identification of any issues faced.</p> <p>This project will help UR further its understanding and identify any potential gaps in current protections.</p>	Improved understanding of the specific challenges facing the farming sector and create a baseline of information upon which improvements in customer protections can be monitored. The research will also be an evidence base to allow the development of future project to ensure these consumers are adequately protected.
13	Improving Energy Literacy	Enablement	<p>We will work with relevant partners to define what is meant by 'energy literacy' and to develop a collaborative approach that ensures positive outcomes for consumers.</p> <p>We will use our research on energy literacy to develop an energy literacy programme and work in partnership with stakeholders to implement this programme.</p>	This project will play a crucial role in defining what is meant by energy literacy and identifying UR's role in terms of delivery. This will require engagement with stakeholders and partners, in particular DfE, the Department for Communities (DfC) and the Consumer Council for Northern Ireland (CCNI). Through this we will identify the strands of energy literacy that UR is able to shape, influence and improve and will



				<p>subsequently develop a programme for delivery.</p> <p>Through the energy literacy project, we intend to improve the consumers' ability to access energy related information, to understand this information and to use this information to make decisions in their best interests and engage fully in the market.</p>
14	Plan for the Implementation of Smart Meters and Systems	Protection/ Enablement	Working in partnership with DfE on the plan for the implementation of Smart Meters and systems will be a core work stream for UR over the next five years.	Ensure Smart Meters can be introduced with the consumer as the focus, maximising the benefits, and avoiding any potential harms in advance of the introduction in Northern Ireland.
15	Best Practice Framework (BPF) – Implementation of a new mandatory Code of Practice (CoP) for Consumers in Vulnerable Circumstances	Protection	<p>Through the BPF we will implement a new mandatory CoP for Consumers in Vulnerable Circumstances to apply to all Suppliers and Distribution Network Operators (DNOs) across electricity, gas and water.</p> <p>We will also introduce a new wider 'vulnerable' definition to be used by regulated companies in Northern Ireland to identify and support consumers in vulnerable circumstances across all of their operations where there are requirements regarding vulnerability.</p> <p>The new CoP and vulnerable definition will be implemented through a new licence condition 'CoP for Consumers in Vulnerable Circumstances'</p> <p>Following publication of our final decisions on the</p>	The implementation of this mandatory CoP and the new 'vulnerable' definition will ensure that consumers in vulnerable circumstances are better identified, protected, and supported by electricity, gas and water suppliers and DNOs. The new CoP will consist of a combination of ten high level principles, supported by industry specific required measures.



			<p>new CoP, we will publish statutory consultation notices for suppliers and DNOs to introduce the new licence condition for the mandatory CoP which will then be followed by our final licence modification decisions. Following implementation of the new CoP, we will monitor the effectiveness of the CoP in delivering fair and appropriate protections to customers in vulnerable circumstances on an ongoing basis.</p>	
16	Best Practice Framework - Implementation of a new Customer Care Register (CCR) structure	Protection	<p>Through the BPF, we will implement the following changes to the current CCR structure:</p> <ol style="list-style-type: none"> 1. The implementation of a single CCR for electricity, gas and water. 2. The introduction of a two-tiered customer care structure with the top-tier being for medical care and the second being needs based. <p>The new CCR structure will be developed, implemented and maintained via industry working groups.</p>	<p>The new CCR structure will help to ensure consistency of support and services available for vulnerable consumers across electricity, gas and water. Changes to the CCR structure (to a total of three CCRs) will have the benefits of making it easier and less confusing for consumers to sign up for additional supports across utilities. The changes will also ensure that consumers are receiving the appropriate support specific to their needs by moving to a two-tiered register (both medical and needs based).</p>
17	Implementation of Updated Electricity Guaranteed Standards of Service (GSS) and Overall Standards of Performance	Protection	<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 exemptions). OSPs set out general required performance targets that apply to the overall customer base and do not carry a compensatory payment if breached.</p> <p>We will publish the final decisions on the updated</p>	<p>The introduction of a reviewed GSS/OSP regime will enhance standards and protections for all consumers. 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>



	(OSP)		<p>GSS/OSP regime and work with DfE on preparing and implementing the new regulations.</p> <p>DfE will have the role of laying the GSS regulations before the Northern Ireland Assembly.</p>	
18	Consumer Energy Charter each Winter	Protection	<p>We will continue to engage with stakeholders to review the Consumer Energy Charter commitments ahead of the winter period each year, to ensure it continues to provide effective additional support and enhanced protections to consumers during the winter period where these are most needed.</p>	<p>The charter will put in place enhanced protections for households during the winter period, in particular for vulnerable consumers. Electricity and gas suppliers who sign up to the charter do so on a voluntarily basis.</p>
19	Review of the Energy Supplier Codes of Practice.	Protection	<p>We will review each of the existing CoPs and update them accordingly to ensure that they are fit for purpose. This will include review of:</p> <ul style="list-style-type: none"> - Payment of Bills (protections for those struggling to pay for their gas and electricity or in debt) - Services for Prepayment Meter Customers - Marketing - Complaints Handling Procedure <p>This review will also give consideration to non-domestic consumers and determine whether any protections need amended/expanded to reflect that.</p> <p>We will consider the potential for introducing new CoPs based on any new market issues or Just Transition. These will be scoped after the mid-term review.</p>	<p>Reviewing CoPs will enhance protections for consumers, in particular for consumers in vulnerable circumstances.</p>



20	Company Vulnerability Strategies	Protection	We will set a requirement for electricity, gas, and water companies to develop and report on a vulnerability strategy for their organisation.	Vulnerability strategies will ensure that consumer protection is given primary consideration at Board level and within company decision making, embedding such considerations within the company culture and providing accountability for actions at a strategic level.
21	Bereavement Support	Protection	Aimed at strengthening protections for consumers who have been recently bereaved.	Improved protections for consumers who have been recently bereaved. This will include the implementation of requirements in relation to closing accounts with suppliers, returning of any credit, switching tariffs if a plan no longer meets the household needs following a bereavement, training of staff and dedicated call lines and/or email addresses.
22	Third Party Intermediaries (TPIs) in the Non-domestic Retail Market	Protection	<p>We will undertake a project to develop our understanding of the operation of TPIs in the Northern Ireland non-domestic energy retail market.</p> <p>Responses to our December 2023 Call for Input regarding the 'Review of the Regulation of the Non-Domestic Energy Retail Market' identified several options related to TPIs and consumer protection issues. We intend to explore these options—amongst others—and determine their suitability for the Northern Ireland market</p>	Improved protections for non-domestic customers that choose to use TPIs including increased consistency of approach across suppliers.



23	Improving Non-domestic Consumer Experience	Protection	<p>Responses to our December 2023 CfI regarding the 'Review of the Regulation of the Non-Domestic Energy Retail Market' identified several areas where non-domestic consumers were being impacted adversely. This included—but was not limited to—areas such as tariff transparency and unfair contract terms.</p> <p>We will explore whether a range of options can mitigate these issues and improve the overall experience of non-domestic consumers.</p>	Improve levels of understanding amongst non-domestic consumers and raise overall levels of confidence in the market to enable full engagement.
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Annex 2: Delivery Plan for Years 1 - 3

Ref	Project	Year 1				Year 2				Year 3				Post the Mid Review
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
1	Domestic Tracker	→				→				→				
2	Non-Domestic Tracker	→								→				
3	Research into the consumer issues arising as part of the Energy transition. Energy Transition and Consumer Issues									→				
4	Debt and affordability (Outworking's of our lived experience energy debt research) • Establish a roundtable working group on debt and affordability. • Explore self-disconnection and how best to measure and address this.	→				→				→				
5	Private Rented Sector research (Research)									→				
6	Energy Literacy –(Qualitative Research)	→												
7	Consumer Experience of Smart Meter Rollout	→												
8	Social Tariff (Evidence Base)					→								
9	Supporting the Just Transition to Net Zero	→				→				→				
10	Establish Non-domestic Energy Market Forum	→												
11	Domestic Consumers Supplied by Non-domestic Contracts									→				
12	Farming Sector (Engagement and Research)					→								
13	Improving Energy Literacy					→								
14	Plan for the Implementation of Smart Meters and Systems	→				→				→				
15	Best Practice Framework (BPF) – Implementation of a new mandatory Code of Practice (CoP) for Consumers in Vulnerable Circumstances.	→												
16	BPF - Implementation of a new Customer Care Register (CCR) structure	→				→				→				
17	Implementation of Updated Electricity Guaranteed Standards of Service (GSS) and Overall Standards of Performance (OSP)	→												
18	Consumer Energy Charter			→			→					→		
19	Review of the Energy Supplier CoPs: - Payment of Bills - PPMs - Marketing - Complaints - Potential for new CoPs					→				→				→
						→				→				→
20	Company Vulnerability Strategies									→				
21	Bereavement Support									→				
22	Third Party Intermediaries (TPIs) in the Non-domestic Retail Market					→								
23	Improving Non-domestic Consumer Experience	→				→								



Annex 3: Glossary

BPF	Best Practice Framework
CCR	Customer Care Register
Cfi	Call for Input
CoP	Code of Practice
CPP	Consumer Protection Programme
CPP24	Consumer Protection Programme 2024 - 2029
DfC	Department for Communities
DfE	Department for the Economy
DNOs	Distribution Network Operators
FCA	Financial Conduct Authority
FWP	Forward Work Programme
GSS	Guaranteed Standards of Service
OSP	Overall Standards of Performance
PPM	Pre-Payment Meter
PRS	Private Rented Sector
TPIs	Third Party Intermediaries
UK	United Kingdom
UR	Utility Regulator