

August 26, 2009

Elizabeth Farrelly  
Commission for Energy Regulation  
The Exchange  
Tallaght  
Dublin 24

Dear Ms Farrelly:

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So in summary why do I object to debt blocking,

1. Refusing to pay a bill due to bad service is a legitimate way for a consumer to resolve a complaint, in fact it is the only tool open to a customer when dealing with a company **XXX**, if good service was provided bad debts and account hopping would reduce. Debt blocking does nothing to improve dispute resolution.
2. Debt is part of normal commerce and it is up to suppliers to manage this debt.
3. From a competition point of view, those companies that manage debt and minimize losses in this regard will be able to supply their good customers with cheaper energy, debt blocking just rewards those incompetent companies **XXX** that can't manage debt.
4. Paragraph Removed for Publication
5. Under Statutory Instrument signed by the chairman of the CER companies **XXX** can hold the account holder liable until the account is taken out of their name, this ensures somebody is accountable for the debt up to that point.
6. Under company legislation directors are responsible for ensuring that they safe guard the assets of their company, therefore when a company is informed of an account changing hands the directors of the company that own the meter know they have an unsecure asset and it is up to them to lock it or find a new account holder to take responsibility, so the company is never exposed to unknown occupants.
7. Debt is minimised when invoices are generated regularly and payment sought on a regular basis, it is clear that this is not always the case **XXX**.

8. From my experience companies [redacted] are acting illegally in their debt collection methods with the consent and knowledge of the CER, debt blocking just facilitates more illegal activity.
9. The CER does not have the integrity, competencies or resolve to fulfill their statutory responsibilities in relation to investigating complaints against companies who will abuse this unjust facility if granted.

Sincerely,

Ray O'Connor

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PHONE: • FAX: