Response to the CER’s consultation on the Review of the Supplier’s Handbook

1. Introduction
1.1 Budget Energy is grateful to have the opportunity to respond to the CER and to make our opinions heard about the future of the Energy Market in the Republic of Ireland.
1.2 In the interest of clarity we will be responding to each of the proposed questions in turn.

2. Responses
2.1 Below are Budget Energy’s responses to the questions posed in the Consultation paper.

Question 1
2.2 Budget Energy would agree with the CER in this respect would also like to add that non-household customers are likely to have the resource to be more informed about their energy choices.

Question 2.
2.3 Budget Energy is happy with the proposed requirement. In particular Budget Energy is glad to see additional protection being given to vulnerable customers. We maintain our commitment to ensure that all reasonable steps are taken to accommodate all our customers.

Question 3.
2.4 Budget Energy would suggest that it is sufficient to point customer to where the code of practice can be found. We would also express a strong preference for online as opposed to paper in order to reduce environmental impact.

Question 5
2.5 Budget Energy believes the Existing provisions are adequate

Question 4.
2.4 Budget Energy believes the requirements are sufficient.

Question 6.
2.5 Budget Energy is in favour of the above requirement, we have always prided ourselves on our straightforward marketing practices. We believe that this approach benefits the customer in knowing exactly what they’re getting for their money and the supplier as it keeps the practice simple.

Question 7.
2.6 While Budget Energy are in favour of making finding the tariff information easy to find. We have found that it is helpful to have the tariff information available in no more than 2 clicks. This is the case in Northern Ireland.

Question 8.
2.7 Budget energy is of the opinion that subscription to price comparison websites should be a matter for each individual company and not be a requirement. Further this would be an additional cost that would make it more difficult for smaller suppliers to become established. While we are very much in favour of openness with our customers we are of the opinion that this is an additional step and not beneficial for either supplier or consumer.

Question 9.
2.7 Budget energy is Seeks clarification on whether in proposal 2 these are CER-approved industry average consumption

Question 10.
2.8 Budget Energy is of the opinion that option c) would be the simplest and easiest to understand for the average customer. As Budget Energy is already operating in Northern Ireland we can speak from experience that our customers find this to be an easy to understand system.

Question 11.
2.9 Budget Energy is of the opinion that a limited approach would disadvantage a customer on what the market offerings are and therefore could result in an increase in non-engagement from customers. Budget Energy would prefer a principle based approach for customer protection purposes to ensure that less of regulatory burden on both the Supplier and Consumer. It also is of the opinion that it is more flexible to adapt to changing market conditions.

Question 12.
2.10 Budget Energy is very much in favour of the proposed requirement as it believes that it would encourage openness and transparency in the market.

Question 13
In the interests of the consumer and to aid fair competition, we would agree with this provision

Question 14
Budget Energy believes this is addressed by our reply to Question 13

Question 15
2.11 Budget Energy is very much in favour of the above amendment and anything that would encourage transparency between the customer and the supplier. We would however question the necessity in leaving a cancellation form with the Customer we are currently moving away from paper sign ups and moving towards eforms, however we acknowledge that many customers may not have access to these systems.
Question 16
Please refer to our answer to Question 15

Question 17
Budget Energy would agree with these proposals

Question 18
(c) We believe this would facilitate competition in the marketplace and curb the potential for existing suppliers of scale to in effect subsidise low price offerings for new customers with existing customers on higher tariffs thereby making it more difficult for new supplier entrants to the marketplace

Question 19
6.6.3 We would want to see that there is an onus or a requirement on customers to provide meter readings

Question 20
Budget Energy would agree with these proposals

Question 21
i) Budget Energy believes it is difficult to be too prescriptive on this as each case will vary by supplier & between suppliers
   ii) Budget Energy believes that account must be taken of the greater investment required to be undertaken by suppliers of PAYG meters

Questions 22, 23, 24 & 25
Budget Energy is in agreement with these proposals

Question 26 & 27
Budget Energy believes that this needs to be dealt with on a case by case basis. It is also important to distinguish between cases of genuine hardship and those unwilling to pay for their usage of electricity

Question 28
Budget Energy is in agreement with this

Question 29
Adequate as they are

Question 30
Budget Energy is in agreement with this
Question 26 & 27

2.12 We are in favour of increased regulation in this area. Repayments are a tricky area and debt is in no one’s best interest we would be in favour of any measure that would encourage suppliers and consumers to participate together and come to an Alternative Repayment Arrangement. We are of the opinion that these would need to be based on a case by case basis.

Question 28

Broadly in agreement

Question 29

Adequate as they are

Question 30

Agree

Question 31 & 32

2.13 Budget Energy is of the opinion that a standardised Form for Vulnerable customers would be of benefit. This would ensure that any customers who be classed as vulnerable are identified and protected. If it were left to the suppliers themselves it could be possible that a customer who would be classed as vulnerable and should have the protection that that status affords may fall through the gaps. At the very least we feel like there should be clarification as to what should classify as a vulnerable customer.

Question 33, 35 & 36

Budget Energy is in Agreement with this

Question 37

We believe that this proposal would be overly onerous on suppliers

Questions 38 - 41

Agree

Question 34

2.14 Budget Energy is very much in agreement with the proposed clause. We already have online sign ups and an online system for all of our door to door reps. We already capture any vulnerable customers as part of the sign up process as this ensures that any vulnerable customers are protected from the very beginning and are not left open.

Question 42

Preference for annual billing on PAYG meter customers

Question 44
2.15 Budget energy are happy with the proposed requirement. We do not believe there is any additional information that a consumer would need in order to make a well informed, educated decision on whether a deemed contract is the best decision for them.

Question 45
Strong preference for e-mail / electronic contact as previously noted

Question 46
Agree

Question 47
Budget Energy does not have any additional opinions at present