



# ***CONSULTATION RESPONSE***

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## **Utility Regulator: Review of the Electricity Guaranteed Standards of Service and Overall Standards of Performance**

### **About National Energy Action**

National Energy Action (NEA) is the national fuel poverty charity. We've worked across England, Wales, and Northern Ireland for over 40 years, to ensure that everyone can afford to live in a warm, healthy home.

Together with frontline practitioners, companies, regulators and governments, National Energy Action works to support vulnerable clients, raise awareness and achieve enduring change.

In Northern Ireland, we chair the [Fuel Poverty Coalition NI](#) and act as the secretariat to the [All-Party Group on Fuel Poverty](#). We advocate for policy and regulatory reforms to protect the most vulnerable, and we deliver accredited training to improve standards in energy advice.

Through the [Belfast Warm and Well Project](#), we provide advice and practical support to local people struggling to keep their homes warm.



## Consultation Response

NEA NI understands that this consultation is supplemental to the UR's 2023 consultation on the Review of Electricity Guaranteed Standards of Service (GSS) and Overall Standards of Performance (OSP). This follows the UR's revised legal understanding of the current GSS application, and the events of Storm Éowyn in January 2025 highlighting the need to explore the role of GSS during periods of severe weather. We welcome the opportunity to provide comment on the updated and additional elements of the review, which aim to enhance consumer protection in NI.

Our comments are informed by our research, expertise and extensive experience supporting fuel poor households and vulnerable energy consumers in NI.

### *Chapter 3 – Impact Assessments*

**Q1: Do respondents think that the proposed GSS and OSP will have no negative impact on the groups listed? Please provide evidence.**

We consider that the proposed GSS and OSP is expected to be positive for all consumers. We have not identified any evidence to suggest that any Section 75 Category groups would be negatively impacted.

**Q2: With regards to the Regulatory Impact Assessment, what do respondents consider the key costs and benefits (both monetary and non-monetary) from the implementation of the proposed GSS and OSP are likely to be? Please provide evidence.**

No comment.

**Q3: Do respondents wish to add any views in relation to the impact of the proposed GSS and OSP on those living in rural areas? Please provide evidence.**

We note that the proposed amends to the GSS and OSP would apply to all electricity consumers, including those living in rural areas. Section 4A of the Rural Needs Impact Assessment highlights some of the particular challenges rural households can face with regards to electricity service and supply, albeit in limited detail. These include geographic remoteness and its impact on service restoration, and greater reliance on electricity for heating in off gas-grid areas.



Loss of supply can therefore have a more significant impact in rural areas. In this context, the proposed GSS and OSP may be of particular importance to those living in rural areas.

## ***Chapter 5 – Metering***

**Q4: Do respondents agree with the amended proposed metering GSS for electricity suppliers presented in this chapter? Please provide evidence to support your response.**

**Yes.** Overall, we are satisfied with the proposed metering GSS for electricity suppliers, and we welcome the new clarity that these proposals update regulations which are currently already applicable to electricity suppliers.

The amends and clarification of the parties responsible should make GSS more effective. It is positive that the proposals provide electricity suppliers with clearly defined and realistic timescales to achieve metering activities to the expected standard.

In response to the 2023 consultation, the Consumer Council for Northern Ireland (CCNI) advised that ‘final bills and refunding of final credit balance’ was an area that ought to be considered for inclusion in GSS for electricity suppliers. This was based on CCNI seeing an increasing number of consumers experiencing delays in this area. We note that the proposed metering GSS for electricity suppliers presented in this chapter does not appear to include what CCNI recommended, that:

- Final bills should be issued to customers within 6 weeks of leaving a supplier.
- Final credit should be refunded within 8 weeks.

We are keen to understand from the UR what consideration was given to these recommendations and why it was decided not to include them.

**Q5: Do respondents agree with the amended proposed metering OSP for electricity suppliers presented in this chapter? Please provide evidence to support your response.**

**Yes.** We welcome the proposed OSP on moving of meters, change of meter, and meter reading, that would apply to electricity suppliers.

While OSS has no specific compensation, it is a good practice guidance and gives targets to incentivise suppliers to achieve high customer service levels. We agree with CCNI, in its 2023 consultation response, that annual reporting on these



targets should be published to provide transparency about how each supplier is performing. We also agree that consideration should be given to how and where the information is published to help inform consumers and ensure it properly incentivises suppliers to improve their customer service levels.

**Q6: Do respondents agree with the amended proposed metering GSS for electricity distribution presented in this chapter? Please provide evidence to support your response.**

**Yes.** Overall, we believe the proposed standards are sufficient and provide a good level of consumer protection. We welcome the introduction of GSS for metering errors, which is a new standard for both distributors and suppliers.

It is good that the proposals clearly outline the responsibilities of an electricity distributor when a consumer informs them of a meter error or issue, and the timeframes to report this to the electricity supplier.

**Q7: Do respondents agree with the amended proposed metering OSP for electricity distribution presented in this chapter? Please provide evidence to support your response.**

**Yes.** We welcome the amended proposed metering OSP for electricity distribution. The targets are ambitious and annual reporting on these targets should be published to provide transparency.

### ***Chapter 6 – Supply restoration in severe weather conditions***

**Q8: Of the options presented, can respondents please share their preference in relation to introducing a standard for supply restoration in severe weather conditions. Please provide evidence to support your response.**

We welcome the UR's decision to revisit the supply restoration GSS regulation to specifically consult on the suitability of providing a GSS that would apply during severe weather. This was a crucial outcome of the working group established following Storm Éowyn (Chapter 6.2), and it is positive to see this work being taken forward.

We also welcome the additional research undertaken by the UR into the impacts of severe weather on energy consumers. It is concerning that a majority of consumers (57%) have experienced loss of electricity supply to their home due to severe weather or a storm, and particularly alarming that those reliant on electricity for healthcare needs have been disproportionately affected (67%



compared to 55%)<sup>1</sup>. With severe weather events expected to become more frequent and potentially more severe, it is essential that the role of GSS in such circumstances is agreed and implemented in a timely manner.

NEA NI would not recommend retaining the existing standard (Option 1) or implementing the GB regulations as they stood in 2015 (Option 2). These options do not adequately reflect consumer concerns around severe weather and would leave NI behind on progress made in GB.

Of the remaining options, we consider that implementation of the current GB Regulations which came into force on 1 November 2024 (Option 3) may be the most appropriate. This position should be understood as a pragmatic assessment rather than our ideal preference. Our clear preference is that all GSS payments are funded by industry and not by consumers. However, we recognise that a GSS applicable to severe weather events is not directly comparable to other forms of service underperformance. In such circumstances, the electricity distributor may genuinely be constrained by safety considerations and by the scale of physical damage to the network. Thus, it may not be reasonable to expect this particular GSS payment to be funded in exactly the same way as others.

While we do not agree in principle that consumers should bear any of these costs, we do strongly agree that consumers who experience prolonged outages during severe weather should receive a payment in acknowledgement. On this basis, Option 3 may represent the most appropriate approach currently presented. It maintains alignment with GB, builds on an established framework, and provides acknowledgement of the impact on consumers who experience extended loss of supply.

At the same time, we can also see credible arguments for a delayed repair following loss of service payment scheme (Option 4). A similar Ofgem scheme is voluntary, but we welcome the UR's confirmation that, if introduced in NI, such a scheme would be mandatory under GSS Regulations (Chapter 6.54). The principal advantage of this option is its significantly lower impact on consumer bills. Had it been in place for Storm Éowyn, the UR's modelling suggests the consumer contribution would have been a one-off additional £1 if recovered from all consumers (Chapter 6.58). This amount is far more manageable for the average NI consumer, in the context of high energy prices and ongoing cost-of-living pressures. For example, our most recent polling with LucidTalk revealed that 1 in 5 households have gone without heating or electricity on at least one occasion in the last 24 months, due to not being able to afford it<sup>2</sup>.

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<sup>1</sup> Utility Regulator, (2025). [‘Domestic consumer views of electricity supply loss during severe weather events.’](#)

<sup>2</sup> NEA NI, (2025). [‘LucidTalk – NEA NI: September 2025 – Northern Ireland \(NI\) Attitudinal Poll’.](#)



The principal disadvantage of Option 4 is that it would result in much lower payments to those affected, representing a weaker acknowledgement of the hardship caused by prolonged outages than Option 3. However, both the UR's consumer research and engagement with consumer representative bodies, including NEA NI, indicate that compensation is not consumers' primary concern during such events. Instead, consumers prioritise speed of restoration, clear and reliable information on when supply will return, and access to practical support while power is off. This is reflected in the survey findings, where restoration of supply, communication, and access to local supports ranked significantly higher than compensation.<sup>3</sup> Stakeholder engagement also highlighted the importance of better identification and support for vulnerable consumers, including greater promotion and use of the NIE Networks Customer Care Register, and improved advance preparation, including coordinated advice on how to stay safe, warm and supported during severe weather events.

In summary, while we consider that Option 3 may be the most appropriate option presented, this is a cautious and pragmatic judgement rather than a wholehearted endorsement. Our clear preference remains that consumers should not bear the cost of any GSS payments, but we recognise the practical constraints associated with severe weather events and the clear need for consumers who experience prolonged outages to receive a meaningful payment. We also recognise that Option 4 has potential merits on affordability and consumer acceptability grounds, particularly in light of the UR's own research on consumer priorities. If the UR concludes that Option 3 is the preferred approach, it is essential that any consumer contribution is treated as a temporary and diminishing measure, with a clear expectation that industry funding and improved network resilience should progressively reduce and ultimately remove this burden on consumers.

**Q9: Do respondents think that the proposed level of payments and caps to the payment levels are appropriate? Please provide evidence to support your response.**

In principle, we recognise the rationale for aligning payment levels with those in GB and accept that the proposed payments under Option 3 are intended to provide a meaningful acknowledgement of the inconvenience and disruption caused by prolonged outages. We also note that, based on the UR's analysis, had the proposed cost recovery threshold been in place in previous years, it would only have been exceeded in the case of Storm Éowyn, with other events being fully funded by NIE Networks. This suggests that the mechanism would be triggered in genuinely exceptional circumstances.

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<sup>3</sup> Utility Regulator, (2025). [‘Domestic consumer views of electricity supply loss during severe weather events.’](#)



However, this does not remove our concern about the potential impact on consumers when the cap is exceeded. The consultation indicates that recovery of Storm Éowyn-related costs over a single tariff year would have equated to approximately £15 per consumer. For many households in NI, particularly those on low incomes or in vulnerable circumstances, this would represent a significant and unexpected financial burden at a time when many are already struggling to afford essential energy costs.

For this reason, while we do not oppose the proposed payment levels in principle, we consider the cap and the cost recovery mechanism to be at least as important as the payment amounts themselves. We strongly agree that the cap should be kept under regular review, with a clear objective to reduce the consumer contribution over time as network resilience improves. We would also welcome greater transparency on how the proposed £1 million threshold has been determined, including how it reflects NI's specific circumstances, such as the size of the system, the number of consumers, and our rurality and vulnerability to severe weather.

In addition, it is essential that any payments under a severe weather GSS are made automatically wherever possible, without requiring consumers to submit a claim. The onus should not be on consumers to track incidents, understand eligibility criteria, or navigate application processes in order to receive payments to which they are entitled. This is especially important in the context of variations in literacy levels, digital access and digital confidence across the consumer population.

**Q10: Should a standard for supply restoration in severe weather conditions be implemented, can respondents please share views on how the payment should be funded. Please provide evidence to support your response.**

Our strong preference remains that payments under any severe weather GSS should be funded by industry rather than by consumers. We are concerned about the impact of any further increases in electricity bills, particularly on low-income and vulnerable households, many of whom are already under severe financial pressure and have very limited capacity to absorb additional costs. Even relatively modest increases can cause real hardship, especially in the context of already high energy prices and wider cost-of-living pressures.

At the same time, we recognise that severe weather events are not directly comparable to other forms of service underperformance. In such circumstances, distributors may be constrained by safety considerations and by the scale of physical damage to the network, and it would not be reasonable to treat these events in exactly the same way as more routine failures of service. Proportionality is therefore important, and we acknowledge that, in practice, some limited degree of consumer contribution may be unavoidable.



If consumers are to contribute in any way, it is essential that this contribution is strictly limited, carefully justified, and designed in a way that reflects NI's specific circumstances, including the size of the system, the number of consumers, our rurality, and the vulnerability of many households. It must also be kept under regular review, with a clear expectation that the consumer share should reduce over time as network resilience improves.

We are also concerned about how costs would be controlled in a year with multiple severe weather events. It would be important to understand what safeguards would be in place to prevent against excessive cumulative costs, and whether there would be any limit on the number of incidents in a single tariff year for which costs could be passed through to consumers.

In summary, while we recognise the practical constraints faced by the distributor during severe weather, we strongly caution against any approach that places an undue or open-ended financial burden on consumers, particularly those already in or at risk of fuel poverty.

### *Chapter 7 – Payment levels and inflationary uplifts*

**Q11: Do respondents agree with UR's proposal to increase the current GSS payment levels to align with those currently offered in GB? Please provide evidence to support your response.**

**Yes.** We agree with the UR's proposal to increase the current GSS payment levels to align with those currently offered in GB. It is time the current payment levels were updated, as they have remained unchanged since 1999, and therefore no longer represent a meaningful or proportionate acknowledgement of the inconvenience and disruption experienced by consumers when standards are not met.

Interruptions to supply can have a major impact on households, particularly those already in or at risk of fuel poverty and vulnerable consumers. While we recognise that GSS payment values are not intended to 'reflect or attempt to remedy the actual loss, either partial or while, incurred by the individual consumer in the unique circumstances of every case' (Chapter 7.2), we consider that the proposed increases represent a more reasonable and proportionate acknowledgement of the inconvenience caused to the consumer.

**Q12: Do respondents agree with UR's proposal for annual inflationary uplifts to payment levels? Please provide evidence to support your response.**

**Yes.** We agree with UR's proposal for annual inflationary uplifts. This approach provides a clear and predictable mechanism to ensure GSS payment levels



remain a meaningful and proportionate acknowledgement of the inconvenience and disruption experienced by consumers when standards are not met. It also avoids the long gaps under the existing regime, during which payment levels have “remained unchanged since 1999” (Chapter 7.10). We also welcome that an annual inflationary uplift will apply for payments made by both the electricity distributor and electricity suppliers.

**Q13: Do respondents agree with UR’s proposed methodology for annual inflationary uplifts to payment levels? Please provide evidence to support your response.**

**Yes.** We consider linking adjustments to CPIH and rounding to the nearest £5 a sensible and transparent approach. We encourage the UR to consider how it will communicate annual inflationary increases not just to the electricity distributor and electricity suppliers but also to consumers, so that they are aware of and have confidence in the GSS payment levels they are entitled to receive.

### *Chapter 9 – Exemptions*

**Q14: Do respondents agree with UR’s proposed approach to update the exemptions to be informed by those in place in GB? Please provide evidence to support your response.**

The consultation states that the UR proposes to implement an updated set of exemptions for the electricity distributor and electricity supplier informed by the current GB Regulations. In response to this, we reiterate comments made by CCNI in its response to the 2023 consultation, that while “it is sensible to have parity with other jurisdictions... there should be more clarity around what these exemptions are to ensure that they are appropriate to NI.”

### *Further Comments:*

- We would welcome further clarity on how the UR intends to **monitor compliance** to updated GSS and OSP, how enforcement will operate in practice, and whether this information will be publicly available. Given the importance of these standards to consumer protection, it is essential that there is clear oversight, transparency and accountability.
- We are positive about the proposed GSS and OSP improvements, and it is important that consumers are aware of these developments. As such, we would advocate for a **coordinated awareness-raising campaign** to ensure consumers are properly informed about GSS standards and associated payments. This is especially important for consumers who may have less



communication and relationship with their supplier, such as PPM customers. This awareness-raising should be complemented by automatic payments wherever possible, so that consumers are not required to navigate complex processes to receive payments to which they are entitled.

- We support NIE Networks' proposal to bring forward its tree-cutting programme in order to **improve network resilience**. While this is expected to increase consumer bills by around £1.50, we consider this a proportionate and preventative investment likely to be more cost-effective for consumers than delaying the programme and facing greater disruption and potentially higher compensation costs during severe weather events, particularly if these costs are partly recovered from bills. We look forward to further detail in a forthcoming UR consultation on this matter. It is also important that continued and demonstrable improvements in network resilience are appropriately reflected in future price controls.
- We are positive about the proposed GSS and OSP improvements for electricity and would welcome an update on the current position in relation to GSS and OSP for gas suppliers and gas distribution.
- For ease of reference, below is a summary of the points on which we would welcome further clarity from the UR, which we have highlighted in this response:
  - Why the proposed metering GSS for electricity suppliers does not appear to include a standard relating to final bills or refunding of final credit balances, despite this being a recommendation put forward by CCNI in its 2023 consultation response (see our response to Q4).
  - How the UR intends to monitor compliance with the updated GSS and OSP, how enforcement will operate in practice, and whether information on compliance will be made publicly available.
  - How the value of the proposed severe weather cost recovery threshold was determined (see our response to Q9).
  - How the costs to consumers of a severe weather GSS would be controlled in a year with multiple severe weather events (see our response to Q10).
  - An update on the current position in relation to GSS and OSP for gas suppliers and distribution.