



CONSULTATION RESPONSE

Submitted: September 2026 | Contact: shannon.barber@nea.org.uk

Consultation on the Publication of Utility Regulator Compliance and Enforcement Annual Report

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

1. Do you agree with our proposed compliance data providing detail of both our routine and annual compliance monitoring?

Please provide clear reasoning and examples where possible evidencing the impact of your views.

Yes. NEA NI agrees that the UR's compliance data should provide detail of both routine monitoring of licence compliance and annual Statement of Licence Compliance (SoLC) findings. Together, these provide a more complete picture of licence performance and regulatory oversight throughout the year.

Publishing information from both sources is a transparent approach that provides greater insight for consumers and stakeholders into how the UR holds the companies it regulates to account, increasing consumer confidence in regulatory oversight. As a fuel poverty charity, NEA NI understands that consumers need confidence that suppliers and distribution network operators are meeting their obligations consistently and not simply at annual reporting points. We therefore support publication of information on both routine and annual compliance monitoring.

For households experiencing fuel poverty, failures in areas such as billing, debt management, customer service or support for vulnerable consumers can have a significant impact on health, wellbeing and energy affordability. Routine compliance monitoring can help identify emerging issues at an earlier stage, while annual compliance reporting provides assurance regarding overall governance and resolution arrangements.

2. To what extent would it be necessary or desirable to have the published data anonymised / pseudonymised?

Stakeholders should outline and explain (where applicable) their rationale for the views expressed and include examples where appropriate.

NEA NI supports a proportionate and consumer-focused approach to anonymisation.

We recognise that there may be circumstances where anonymisation is appropriate, particularly where issues are unproven, relate to early-stage compliance concerns, or where publication could prejudice an ongoing investigation. In such circumstances, anonymised reporting may be appropriate to avoid unfair reputational damage while allowing the UR to report on emerging themes and risks.

However, where investigations have concluded, enforcement action has occurred, or significant consumer detriment has been identified, we believe transparency should generally prevail and companies should ordinarily be identified. Transparency is a powerful incentive for compliance and for encouraging performance improvements across the sector. This supports the UR's



objectives in relation to 'Enabling best in class energy and water companies'. Transparency can also increase public confidence that regulatory action is delivering meaningful accountability.

Consumers have a legitimate interest in understanding which companies have failed to meet regulatory obligations, particularly where those failures have affected customer outcomes. Naming companies where compliance failures have been established can help ensure accountability and encourage improvements in performance across the sector.

NEA NI would welcome further clarity from the UR regarding the criteria that will determine whether information is anonymised or pseudonymised.

3. To what extent do you agree with our proposal to include relevant detail by licence type to ensure the data remains of value to the reader.

Stakeholders should outline and explain (where applicable) their rationale for the views expressed and include examples where appropriate.

NEA NI agrees with the proposal.

At a bare minimum, where information is anonymised or pseudonymised, we support the inclusion of detail by licence type to ensure the information remains valuable to readers and supports stakeholder assessment of compliance and enforcement activity. For example, reporting by licence type could help identify trends and whether there are any recurring issues within specific sectors.

However, reporting solely by licence type will not always provide sufficient transparency. Licence-type reporting should not be viewed as a substitute for company-level accountability where publication is justified, particularly where compliance failures have occurred or regulatory action has been taken.

Consumers are ultimately affected by the performance of individual companies rather than licence categories. Therefore, while licence-type data is useful and should be included, it should not necessarily replace company-level transparency where publication is justified.

4. Should information about cases closed at the Initial Enquiry Stage through an alternative resolution also be published in our Compliance and Enforcement Annual Report?

Please provide the rationale for your position including how it represents the consumer interest.

Yes. For completeness and transparency, information about cases closed at the Initial Enquiry Stage through an alternative resolution should also be published in the UR's Compliance and Enforcement Annual Report.



Excluding alternative resolution cases would provide an incomplete picture of the UR's compliance and enforcement activity, whereas publication would improve transparency around how potential licence breaches are identified, investigated and resolved, even where formal enforcement action is not ultimately pursued.

Publication of this information can demonstrate regulatory accountability, increase public understanding of the UR's enforcement process and strengthen consumer confidence that compliance concerns are being appropriately addressed.

From a consumer perspective, it is important that stakeholders can understand not only where formal enforcement action has been taken, but also other compliance concerns have been resolved. Where alternative resolution is agreed, NEA NI considers that the report should clearly explain the outcomes that were secured for consumers.

5. Do you have any additional comments on the proposed annual report in relation to how the publication of the proposed information is in the interests of consumers?

If you have any additional comments, please provide clear rationale.

NEA NI strongly agrees that publication of the proposed annual Compliance and Enforcement Report is in consumers' interests.

As a charity working to end fuel poverty and protect vulnerable energy consumers across NI, NEA NI has consistently supported measures that strengthen transparency, accountability and consumer protection. We therefore welcome the UR's proposal to bring compliance and enforcement information together within a single annual report.

The proposed report has the potential to improve public understanding of the UR's compliance and enforcement activities and provide greater visibility of how regulated companies are being monitored and held accountable to meet their licence requirements.

From NEA NI's perspective, the value of the report will be maximised where it demonstrates not only regulatory activity, but also how that activity contributes to improved consumer outcomes, particularly for consumers in vulnerable circumstances and households experiencing fuel poverty.

The report should also be presented in a clear and accessible format, using plain language and concise summaries, so that consumers, representative organisations and other stakeholders can easily understand and assess the UR's compliance and enforcement activity over the reporting period.

6. Do you agree that where this document has an impact on the groups listed, those impacts are likely to be positive in relation to equality of opportunity for consumers?

If you do not agree, please provide your rationale and examples where possible.



Yes. NEA NI agrees that the proposed report is likely to have a positive impact in relation to equality of opportunity for consumers. To maximise positive equality impacts, the UR should ensure that the annual report is accessible and easy to understand. This includes using plain English, plain numbers, making the report available in accessible formats, and promoting its findings through appropriate communication channels so that consumers and stakeholder organisations are made aware of the information available.