



The Consumer Council

Elizabeth House,
116 Hollywood Road,
Belfast BT4 1NY
Tel 028 9067 2488
Fax 028 9065 7701
e mail info@consumercouncil.org.uk

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Ref: PD20010768

Jean Pierre Miura
Utility Regulator
Queens House
10-18 Queen Street
BELFAST
BT1 6ED

Dear Jean Pierre,

Re: Extension to the Criteria for Approval of Intermediary Applications under the Trading Settlement Code

The Consumer Council is a Non-Departmental Public Body set up in legislation to safeguard the interests of all consumers, and particularly the vulnerable and disadvantaged. The Consumer Council is an independent organisation which operates to promote and protect the consumer interest.

We welcome the opportunity to respond to this consultation on the extension to the criteria for approval of intermediary applications under the Trading Settlement Code.

With fuel poverty levels in Northern Ireland at 44 per cent, many households are struggling to adequately heat their home, it is important that the regulatory structures look to minimise the cost of energy to consumers.

Extending the criteria for the approval of intermediary applications could bring benefits for consumers through promoting competition in the SEM. The extension of the criteria must be safeguarded to mitigate the exertion of market power by other existing participants.

The SEM Committee should take into consideration that the extension of the criteria is to allow a single entrant access to a support-scheme. Changes to the criteria should consider the overall structure of the SEM and should only be undertaken if the cost of this action will be offset by the benefit to

consumers, which will ultimately be in the form of lower prices. Any changes should also protect the interests of all consumers.

I hope that these comments are helpful and are given due consideration. Please contact me if you require any clarification.

Yours Sincerely,

Andrew Murray
Senior Consumer Affairs Officer