



The Consumer Council

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Ref: PD20090279

Frankie Dodds
Social & Environmental Branch
NIAUR
Queens House
14 Queen Street
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Re: Consultation on Interim Arrangements : Fuel-Mix Disclosure the SEM

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 welcomes the opportunity to respond to the consultation on Interim Arrangements: Fuel – Mix Disclosure in the SEM.

The Consumer Council supports the overall aims and objectives of Article 3(6) of EU Directive 2003/54/EC, as it enables consumers to clearly identify the overall fuel mix and the carbon emissions of their supplier, thus allowing consumers to have an increased recognition of their consumerism and its effect on sustainability.

Unfortunately, due to the lack of energy competition in Northern Ireland, especially in the domestic sector, it will be impossible for the majority of consumers to make a decision on their energy supplier, based on the generation fuel mix and carbon emissions.

Therefore the overall cost of implementing this Directive must be set against the limited benefits that it will currently provide the majority of consumers in Northern Ireland. We would request that the most cost effective methods are used, and the cost is not borne by consumers who can not fully benefit from the information provided.

In the business sector, where competition does exist, information about an individual supply company's generation will not enable consumers to compare suppliers. It will therefore be important to provide comparative information, and this should be made easily available, eg on a website.

In addition, we would like to highlight that currently domestic customers with Keypad Meters do not receive written bills. A method will therefore be needed to ensure all customers, whatever their payment method, receive the same quality of information.

We would request that any information provided does not compromise the principal that all energy bills are clear, easily understandable, accurate and accessible to all. We would like to take this opportunity, to encourage the development of harmonised and consistent bill layout across all utilities and all suppliers, and would encourage the use of consumer focus groups and discussion with organisations representing Section75 Groups and vulnerable consumers, to ensure the clarity and accessibility of energy bills is attained.

If you require any clarification please contact me.

Yours Sincerely,

Richard Williams
Senior Consumer Affairs Officer