ALONE Submission on Additional Customer Protection Measures for Household Electricity and Gas Customers

Commission for Regulation of Utilities (CRU)

27 May 2025

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Dear CRU Team,

We welcome the opportunity to contribute to your review of the **Additional Customer Protection Measures for Household Electricity and Gas Customers.**

We strongly support the continuation of measures under CRU202489. Given that energy prices remain high and supply instability continues due to international conflict and fossil fuel dependence, these supports remain necessary. Recent CSO/SILC data show that 25.9% of single adults aged 65+ were at risk of poverty—up from 15.4% in 2023—with 45.6% potentially in poverty without cost-of-living supports. It is our experience in ALONE that energy affordability continues to pose a significant challenge for many older people. In 2024, we supported almost 44,000 older people across our services. Approximately one-third of individuals assessed through our services reported experiencing financial difficulties, most of which were related to utility expenses—primarily energy costs.

Winter Disconnection Moratorium

We particularly welcome continuing the winter disconnection moratorium, which provides vital reassurance to older people during colder months. However, we believe this protection should be extended beyond the current timeframe. Temperature data from 2024 shows that cold conditions begin as early as October and persist well beyond February, with night-time temperatures frequently falling below 7°C; a threshold considered unsafe for older people due to increased risk of hypothermia and other cold-related health issues. We therefore recommend extending the disconnection ban to cover a longer seasonal period as it was in 2023, from October through March. Additionally, automatic disconnections due to non-payment, even when not technically in breach of the winter moratorium, remain distressing and inappropriate for many older individuals who may not be formally registered as vulnerable. We would ask that the CRU be particularly mindful of what qualifies as a “vulnerable person” and ensure that there are protective measures in place that meet a certain level of flexibility in this space.

Debt Repayment

Regarding the CRU's current measures on debt repayment—which allow a minimum of 24 months for customers on a repayment plan—this timeframe should be maintained, rather than reduced to 18 months. The current initiative has helped many people and as long as prices of gas and electricity remain high, the ability of consumers to make quicker repayments is not likely to increase. Suppliers have stated that “reducing the minimum of 18 months will encourage customers to continually engage with their supplier” but we are of the belief this will put unnecessary pressure on the user.

Economic Tariffs

On Point 3, *Ensuring customers with financial hardship meters are on the most economic tariff available*, we would like to highlight that the increasing reliance on digital communication platforms creates barriers for many older people. There are some individuals who are unable to use online price comparison tools or access energy advice, placing them at a disadvantage when it comes to understanding market options or switching suppliers. The CRU no longer publishes age-related breakdowns of customers who switch energy suppliers, but ALONE has found that people over the age of 65 face higher rates of energy poverty because they struggle to switch suppliers. With approximately 275,000 people over 65 in Ireland not using the internet at all, we recommend a parallel system of accessible, offline information and customer support be maintained and strengthened to ensure that all people over 65, particularly those in receipt of the Fuel Allowance, qualify and are made aware of introductory energy offers.

Supports to Customers on Payment Plans

As outlined in the consumer protection measures, in the event that a person is facing difficulty paying their electricity or gas bill, they are encouraged to contact their energy supplier to arrange a payment plan. The CRU requires suppliers to have trained staff available to support such situations. However, there are many reasons why a person may be reluctant or unable to contact their provider directly. Many experience challenges when they do so. Additionally, as previously noted, some individuals may not have access to the internet to research available supports.

Following the European STEP initiative, Lithuanian project partner Vartotojų Aljansas successfully ensured that over 200,000 consumers now see energy advice hotline numbers printed directly on their bills. This allows individuals to access immediate assistance when facing difficulties. ALONE recommends that Irish energy suppliers be required to do the same. In addition to advising customers to contact their supplier, energy bills should also list relevant support organisations—such as MABS, Local Authorities (through Urgent and Additional Needs Payments), and ALONE. This is a zero-cost initiative that can be mandated by the CRU and would provide crucial guidance for customers, particularly those without internet access, helping them better understand and navigate their energy options.

Other Comments

Finally, we would like to share feedback in response to questions raised at the recent Consumer Stakeholder Group meeting about the impact of Storm Éowyn and the actions taken by energy suppliers afterward. Many older people were left without power for extended periods, and we noted several issues with both the delivery and communication of support during this time. While there were positive examples—such as ESB Networks' use of the PowerCheck website and the swift deployment of repair crews from across the EU—many older individuals could not access updates due to a lack of internet access. Radio announcements were especially useful in rural areas, and we strongly recommend their continued and expanded use during future outages. We urge the CRU to enhance requirements for energy and communications providers to ensure timely, accessible information is available to older and vulnerable customers during service disruptions.

Thank you for your ongoing commitment to customer protection. We remain available to discuss these issues further and look forward to continuing to support the CRU's work in this area.

Kind Regards,

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