An Coimisiún um Rialáil Fóntais

Commission for Regulation of Utilities

CRU Decision on Additional Customer Protection Measures for Household Electricity and Gas Customers 2025/26

Decision Paper

Reference:	CRU2025125	Date Published:	29/08/2025		

The Exchange, Belgard Square North, Tallaght, Dublin 24, Ireland
T +353 1 4000 800 | F +353 1 4000 850 | www.cru.ie

CRU Strategic Plan 2025-27

Vision, Purpose, and Values

OUR VISION:

Resilient, efficient, sustainable, and safe energy and water services for Ireland.

OUR PURPOSE:

We actively serve the public interest by regulating the provision of energy and water to Irish homes and businesses, while supporting the transformation to net zero.

OUR VALUES:

- Integrity
- Professionalism
- Openness
- Accountability

Executive Summary

The CRU's Additional Customer Protection Measures ("the Measures") were initially published in September 2022[1], as a response to the Government's National Energy Security Framework[2] ("the Framework"). The Framework sought to address the challenges of ensuring ongoing and long-term security of affordable energy supply arising from the war in Ukraine. The original CRU Additional Customer Protection Measures Decision, published in September 2022, addressed two responses designated under the Framework as necessary for managing the impact on consumers and businesses with a specific focus on financially vulnerable residential consumers in the short-term.

The initial CRU Additional Customer Protection Measures Decision Paper addressed these themes by introducing 15 measures, ranging from promoting training for call-centre staff to

---

[1] https://www.cru.ie/publications/27364/

[2] https://www.gov.ie/en/department-of-the-environment-climate-and-communications/publications/national-energy-security-framework/

increased disconnection moratoria length. Subsequent CRU Additional Customer Protection Measures Decisions, published in August 2023[3] and August 2024[4], largely maintained these measures, with some modifications.

The Government recently established the National Energy Affordability Taskforce[5] (NEAT), with which CRU is working. The NEAT aims to identify short-term measures to support energy consumers in advance of Budget 2026, as well as working towards medium-term and long-term measures and structural reforms to lower costs for households. The CRU expects that working with the taskforce will help provide it with a better understanding of the issues customers face in meeting their energy bills, to feed into CRU customer policy.

As of July 2025, the weighted average price of standard electricity and gas tariffs respectively stood at 69% and 102% higher than what they were in January 2021, while the value of arrears on both the domestic electricity and gas markets increased over the past winter. Furthermore, the CRU understands that the forthcoming winter will be the first post-crisis winter in which there will not be a universal Government Electricity Credit Scheme (GECS) for customers. Since March 2022, the GECS have deducted a combined €1,500 (excluding VAT) from the bills of each domestic electricity account in Ireland. Given that arrears levels have continued to climb (with a combined 12% more accounts in arrears across both domestic electricity and gas markets in May 2025 compared to May 2024) while these Credit Schemes have been in operation, it may be expected that arrears levels could spike further in their absence.

Although disconnection levels have remained low (compared to pre-Covid) in part due to suppliers' commitments to the Energy Engage Code to not disconnect customers that are meaningfully engaging with them, the CRU believes that measures included in this decision aimed at customers taking the necessary steps to remain engaged with their supplier will help to avoid disconnection, such as promotion of repayment plans and vulnerable customer registration.

As a result, the CRU has decided that the broad continuation of the measures already in place are necessary for a further year but acknowledges that further work is required outside of these measures to identify bespoke policies that can alleviate energy bill struggles for customers. Therefore, the CRU intends to publish a call for evidence to assess competition in the Irish retail energy markets, which will seek views on ways in which customers struggling to pay their energy bills can be supported beyond the CRU Gas and Electricity Suppliers' Handbook on

[3] https://www.cru.ie/publications/27635/
[4] https://www.cru.ie/publications/28280/
[5] https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/national-energy-affordability-taskforce/

which the majority of measures in this decision are based. This may include suggestions on the advertising of, and customer understanding of, supplier acquisition offers, bill transparency, customer arrears and suggestions on how to foster a more informed customer base to help them find the most competitive offer available to them. The CRU will also be running a communications campaign this forthcoming winter to promote customer switching.

Suppliers, via the Industry Governance Group, and members of the CRU’s Customer Stakeholder Group were provided an opportunity to provide feedback on the effectiveness of the measures over the winter 2024/25 period. This feedback, in conjunction with the CRU’s retail market monitoring activities, has provided the basis for the CRU’s decisions for the measures for winter 2025/26.

Public/ Customer Impact Statement

As has been the objective of the CRU’s Additional Customer Protection Measures Decisions since they were initially introduced in 2022, the measures seek to protect customers from the worst effects of high energy prices, while retaining an open, competitive retail energy market. The CRU, as was the case in previous reviews of the Additional Customer Protection Measures, has sought to balance the data in areas such as arrears, non-payment of account (NPA) disconnections, domestic electricity and gas price trends, payment plans and vulnerable customer registrations, with feedback provided by suppliers and members of the CSG on the measures’ effectiveness.

Table of Contents

1. Introduction

1.1 Background

The Commission for Regulation of Utilities (CRU) is the independent body responsible for overseeing the regulation of electricity and gas sectors in Ireland. The CRU has a legislative obligation to protect the interest of energy customers and promote competition in retail energy markets.

Under its legal mandate, the CRU is responsible for implementing energy specific customer protection measures. This has been carried out through the development of requirements and guidelines for energy suppliers and network companies, reflected in several documents including Standard Terms and Conditions of Supply, Codes of Practice and Customer Charters, as detailed in the Suppliers' Handbook, gas and electricity supply licences and market design rules.

The Electricity and Gas Suppliers' Handbook (the Handbook) sets out obligations on electricity and gas suppliers under Condition 18 of the Electricity supply licence and Condition 21 of the Natural Gas Supply Licence. It sets out the requirements for Codes of Practice which cover all key areas of customer/supplier interaction, such as, marketing and advertising, billing, disconnection, smart services and vulnerable customers. These rules are in place to ensure that customers experience a high standard of protection when interacting with energy suppliers.

The measures identified by CRU in September 2022's decision were the result of a review of the Handbook, and any changes made to those measures in the subsequent Additional Customer Protection Measures Decisions, have arisen due to observations made in CRU's retail market monitoring activities, and due to feedback received from Customer Stakeholder Group members, suppliers and network operators.

The requirements set out in the Handbook remain in place. However, this paper sets out additional protections for customers that enhance the already-existing protections in the Electricity and Gas Suppliers Handbook. These measures seek to continue to protect customers in the face of continually high electricity and gas prices and lessened Government supports.

The CRU has taken a number of factors into account in reaching this decision including:

- Arrears levels: Worsening arrears situation in the past year with a combined 12% more accounts in arrears across both the domestic electricity and gas markets compared to last year (see figure 4 below).

- Retail prices: Have remained persistently high at around 70% and 100% higher than pre-crisis levels in domestic electricity and domestic gas standard tariffs respectively (see figures 1 and 2 below).
- Indications from Government suggest that Irish households are going to face into their first post-crisis winter without any universal supports on their energy bills.
- NGOs have reported very high levels of customer contacts in the last year.
- Supplier hardship funds have either ceased or paused.

The difficulties which still face households, despite being three years on from the most volatile price shocks, are best reflected by observing pricing and arrears data, as these metrics clearly portray how much more difficult it has become for households to meet their energy bills.

Taking January 2021 as a baseline pre-crisis month, the weighted average standard domestic electricity bill is currently 69% higher. The respective increase in the weighted average domestic gas bill is 102%. The weighted average Estimated Annual Bill in both the domestic electricity and gas markets has very marginally increased in the past year (See figures 1 and 2 below), as wholesale prices remain high across Europe as alternative markets are utilised in the absence of Russian gas imports, as well as other factors such as an increase in the PSO levy and a rise in the carbon tax rate.

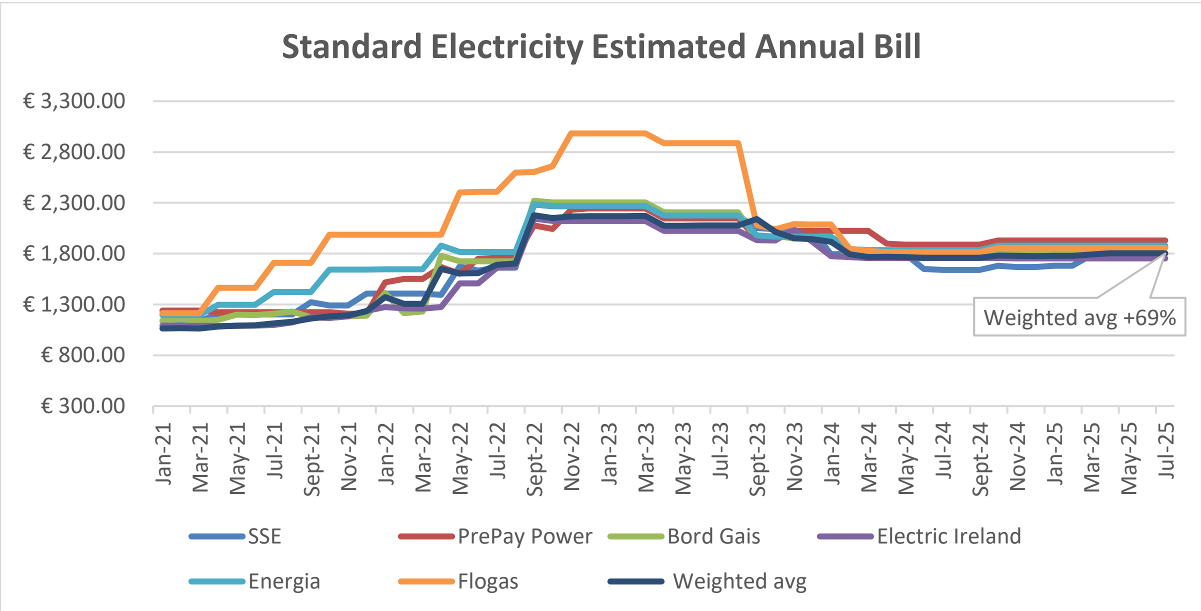

Figure 1: Standard Tariff Electricity EABs 2021-25

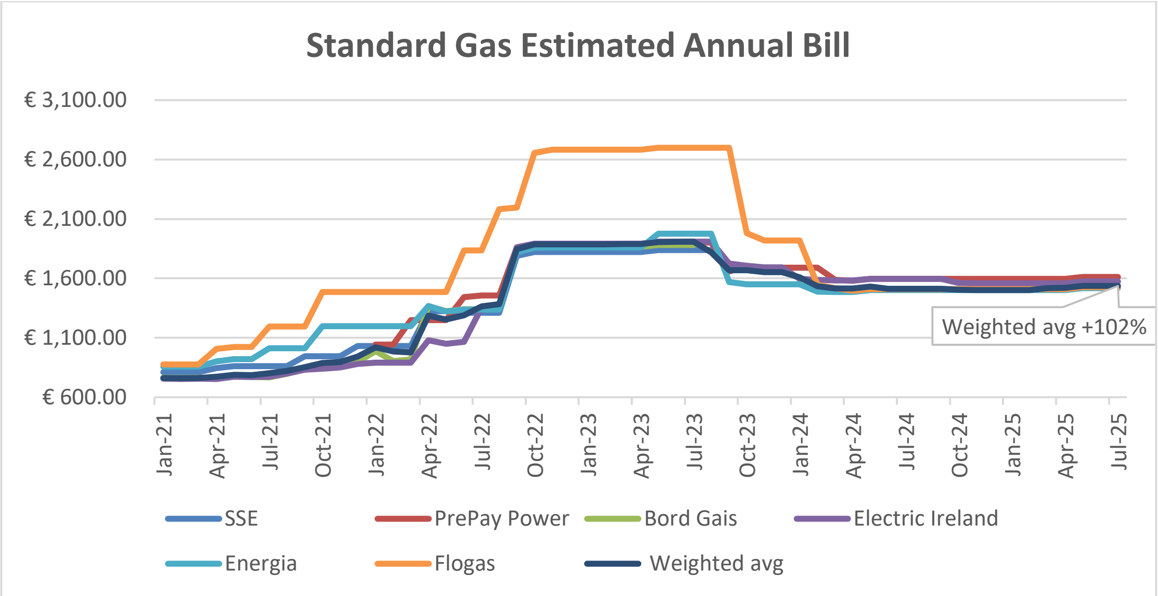

Figure 2: Standard Gas Tariff EABs 2021-25

It is also notable that despite the application of four separate Government Electricity Credit Schemes in the period since the Measures were first introduced in 2022, the value of arrears accumulated by domestic electricity customers has increased by 55%, with the respective increase in the domestic gas market being 57%. In the same period, the number of customers finding themselves in arrears has also increased albeit at a more gradual level, with 7% and 29% increases observed in the number of domestic electricity and domestic gas customers finding themselves in arrears respectively. In turn, this means that those customers who are finding themselves in arrears are also finding themselves with a higher monetary level of arrears to repay, with the average value of an electricity account in arrears rising from €341 to €435 since the beginning of the measures, with the respective gas increase being from €164 to €212.

More pertinently, certain arrears metrics have deteriorated in the past year. In the year to May 2025, the number of domestic electricity customers in arrears increased by 18%, with the value of arrears in the domestic electricity market increasing by 22% (see figures 3, 4 and 5). This increase may be attributed to the lower amount of monetary support from Government Electricity Credits being offered to customers in the past winter[6]. So whilst prices have been largely static in the same period, this shows a deteriorated arrears situation in the domestic electricity market.

[6] With two credits each worth €125 (including VAT) being offered to customers rather than three credits each worth €150 (including VAT) as there were in winter 2023/24.

While the CRU does not collect arrears data based on demographics, the Central Statistics Office does and it's 2024 data collection showed some concerning trends, particularly in relation to families with children under 18 years old – among this cohort, one-parent households finding themselves in utility arrears twice or more jumped from 14.1% in 2023 to 28.2% in 2024, while for two-parent households this figure rose from 5.3% to 8%.[7]

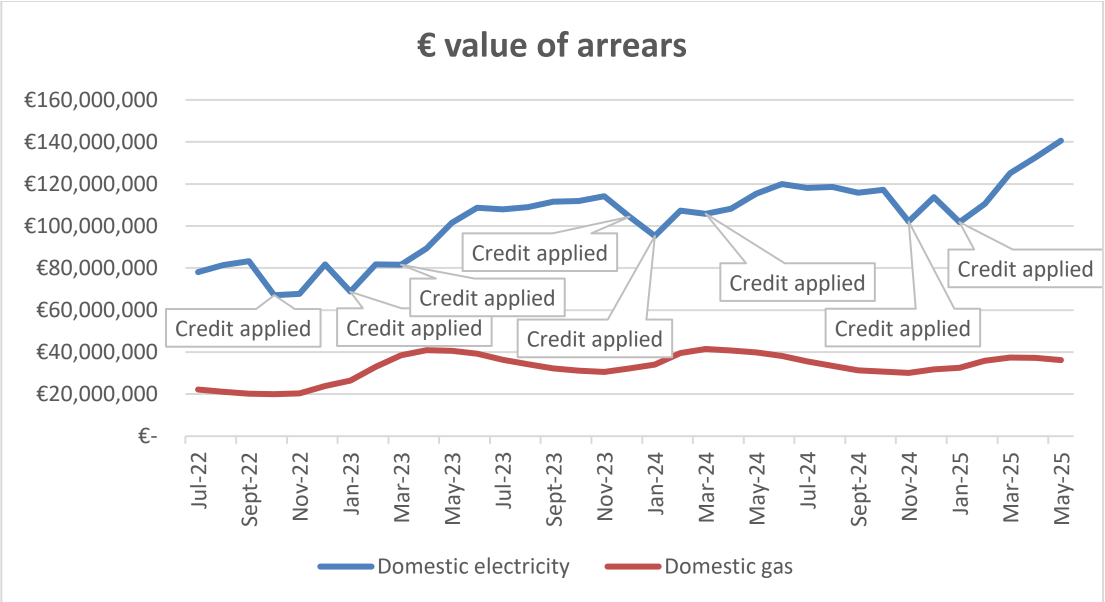

Figure 3: Value of domestic arrears 2022-25

[7] https://www.cso.ie/en/releasesandpublications/ep/p-silced/surveyonincomeandlivingconditionssilcenforceddeprivation2024/householdarrearsandfinancesattheendofthemonth/

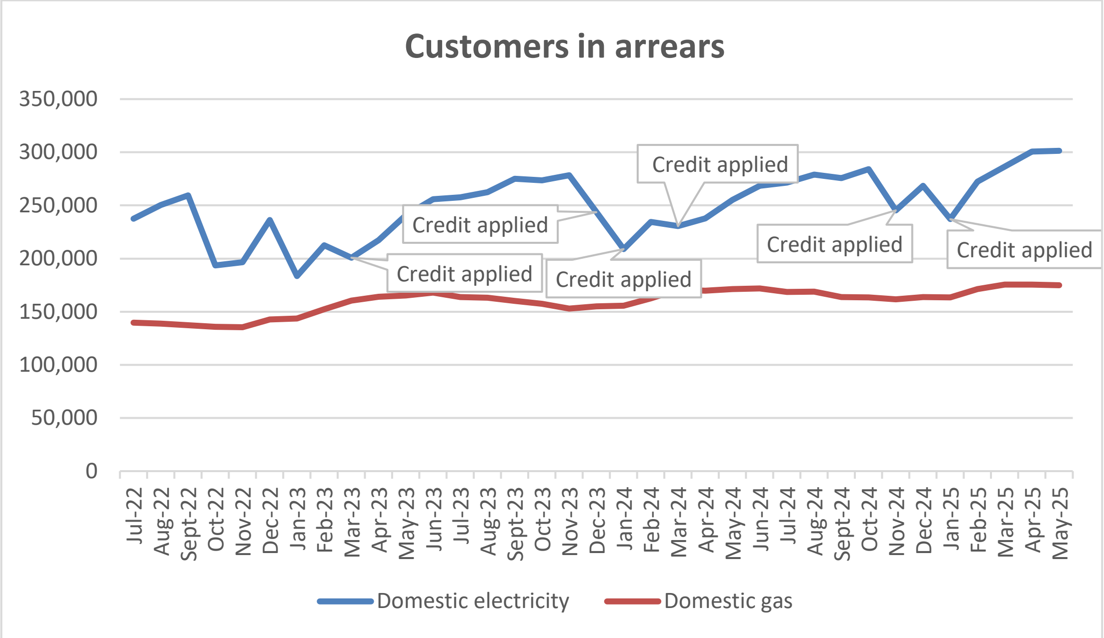

Figure 4: No. of domestic customers in arrears 2022-25

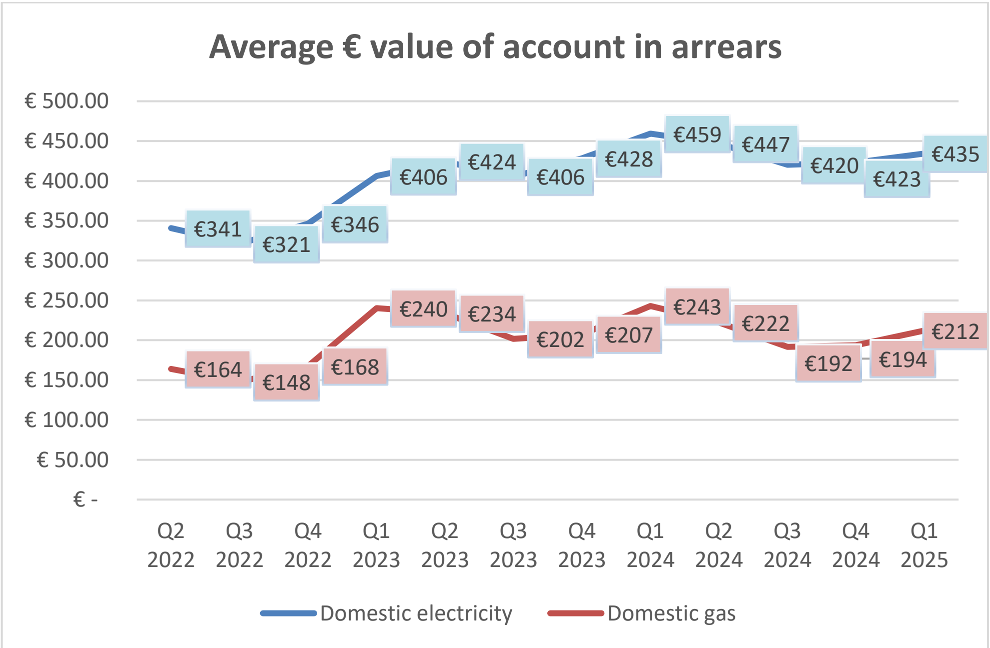

Figure 5: Average value of account in arrears 2022-25

1.1.1 Related Documents

By way of background to this guidance document, the following list of documents is of relevance:

- CRU202324 – Electricity and Gas Suppliers Handbook 2023;

- Department of the Environment, Climate & Communications – National Energy Security Framework
- Department of Climate, Energy and the Environment – National Energy Affordability Taskforce
- CRU202285 – CRU Decision on Additional Customer Protection Measures for Household Electricity and Gas Customers
- CRU2023100 – CRU Decision on Additional Customer Protection Measures for Household Electricity and Gas Customers 2023/24
- CRU202489 – CRU Decision on Additional Customer Protection Measures for Household Electricity and Gas Customers 2024/25

Information on the CRU's role and relevant legislation can be found on the CRU's website at **www.cru.ie**

1.1.2 Structure of Paper

This Decision Paper will follow the following structure

- Effectiveness of the measures in winter 2024/25
- Changes to the measures for winter 2025/26
- Full list of measures for winter 2025/26
- Supplier reporting & next steps

2. Evaluation of effectiveness of measures for winter 2024/25

The CRU has monitored the effectiveness of the additional customer protection measures through analysis of data submitted by suppliers and network operators, which functions as part of CRU's usual retail market monitoring activities.

An update of the effectiveness of the measures is provided below.

- **Disconnection Moratoria:**

CRU Measures in 2024/25:

- **Disconnection Moratorium for all domestic customers from 9 December 2024 to 17 January 2025.**
- **Disconnection Moratorium for all registered vulnerable customers from 1 November 2024 to 31 March 2025.**

Last winter's measures saw a shorter general (all customer) moratorium, reduced from two months down to a period of five weeks. Longer moratoria, while protecting customers from disconnection, have been shown to have some downsides as they can discourage indebted customers from engaging with their supplier, customers may interpret the moratorium as a moratorium on payment of bills which leads to accrued debt for the customer. As it can take up to 14 weeks between a payment being missed and a customer being disconnected, it generally takes a couple of months after a moratorium has been lifted to see which customers have been affected. However, from the information we receive disconnections levels are still running at lower levels than they were pre-Covid (particularly in electricity) and the winter moratorium provides important respite to customers at a time of the year when bills and outgoing expenses are generally at their highest.

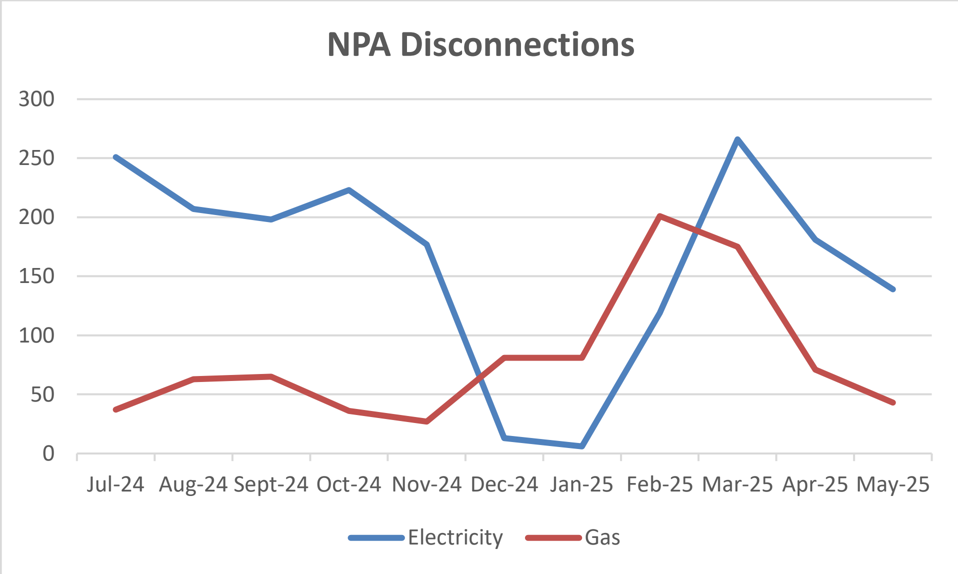

Figure 6: NPA Disconnections 2024-25

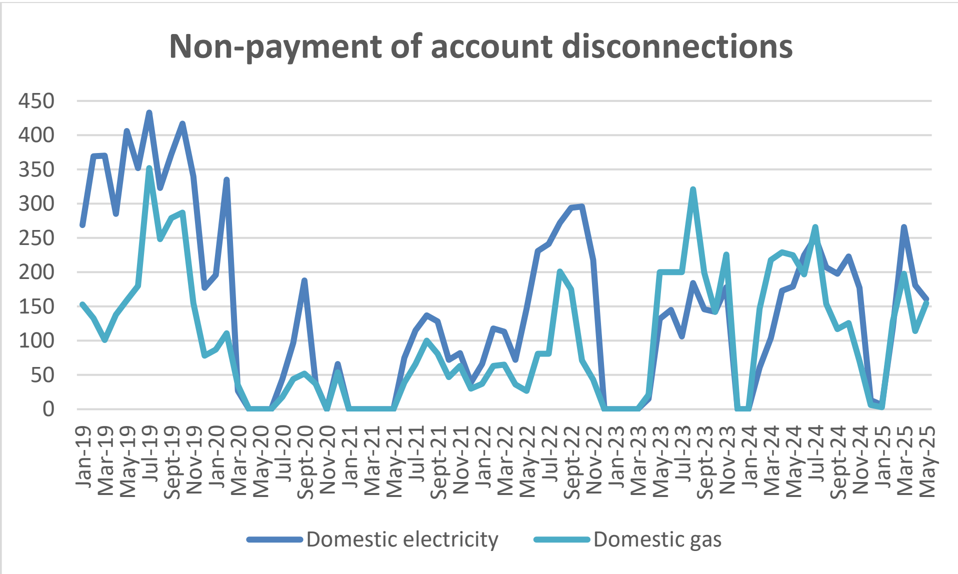

Figure 7: NPA Disconnections 2019-25

Due to the total number of NPA disconnections occurring still running at lower levels (see figures 6 and 7) than pre-Covid, and experience from previous lengthy moratoria that customers can end up losing contact with their supplier and accumulate more debt, the CRU believes it appropriate to maintain the same length of NPA disconnection moratoria for both registered vulnerable customers and all other customers as was in place for winter 2024-25.

- **Debt Repayment**

CRU Measures 2024/25:

- **Debt repayment plans extended to allow a minimum of 18 months for customers on a debt repayment plan. Customers may repay debt in a shorter period if they prefer.**

A key objective of the original Additional Customer Protection Measures was to promote the uptake of repayment plans as a way of encouraging customers to communicate with their supplier and find amenable ways to pay off arrears, acknowledging that the steep price increases being borne by customers would result in greater numbers falling into arrears. As such, the original measures stipulated that suppliers should offer customers a minimum timeline of 24 months to repay their debt (unless the customer themselves requested a shorter timeline). Feedback from suppliers in previous years outlined how this approach was not conducive to customers completing their repayment plans, with suppliers citing that customers would opt for the longest timeline available but then unfortunately break their repayment plan, meaning that an entirely new repayment plan would need to be arranged. In the 2024/25 Additional Customer Protection Measures Decision, the CRU reduced the minimum repayment timeline from 24 months down to 18 months.

The overall number of customers on repayment plans has increased in the lifetime of the measures (by around 70% in both electricity and gas markets), but it still represents a relatively small proportion of the total number of accounts in arrears (<5% of total number of accounts in arrears in March 2025). The CRU understands that it is time-consuming for suppliers to negotiate on a case-by-case basis with customers in arrears which creates inefficiencies against the backdrop of an increasing proportion of customers failing to complete their repayment plan, as has happened this past winter with the ratio of successfully completed vs. broken domestic electricity plans falling from 62%/38% in the October 2023 to March 2024 period to 56%/44% in the October 2024 to March 2025 period. A similar trend has developed in the domestic gas market, with the successfully completed/broken repayment plan ratio dropping from 54%/46% in winter 2023/24 to 48%/52% in the past winter (see figures 8 and 9). However direct contact with customers can encourage customers to enter sustainable repayment plans and prevent further accumulation of debt. The CRU has decided, given that the data across suppliers shows that a persistently high number of repayment plans are being broken, particularly those where customers have been offered a repayment plan of at a minimum 18 months in length, suppliers are required to follow additional requirements when interacting with customers in debt being offered a repayment plan. These requirements are set out in detail in **section 3.2**.

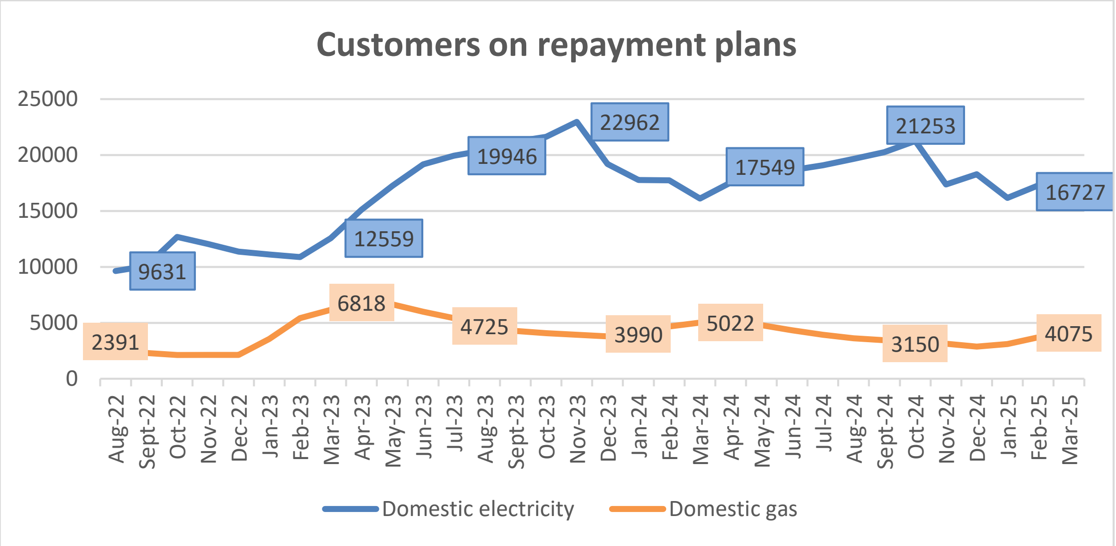

Figure 8: Customers on repayment plans 2022-25

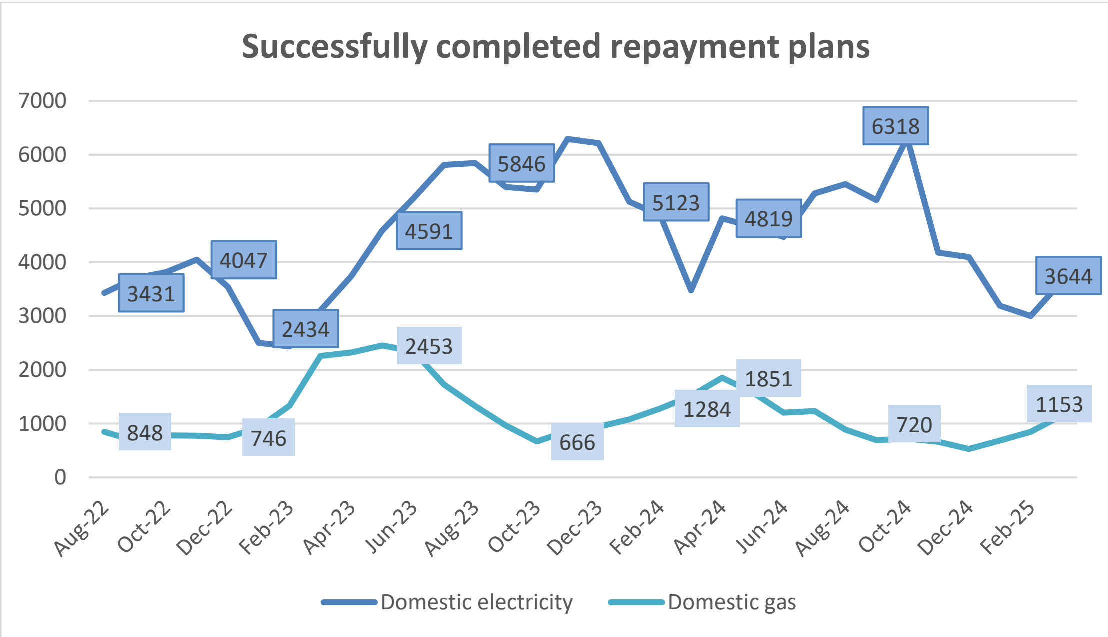

Figure 9: Successfully completed repayment plans 2022-25

- **Financial Hardship, Lifestyle Choice PAYG & Vulnerable Customers**

CRU Measures 2024/25:

- **All customers with a financial hardship meter to be placed on the most economic tariff available from their supplier.**
- **Enhanced requirements on suppliers to actively promote the vulnerable customer register and the protections it offers.**

- **Suppliers required to advise all customers they can have a "nominated representative" to manage their account.**
- **Emergency credit on all electricity and gas PAYG meters to represent no less than €20 credit.**
- **Suppliers required to inform their PAYG customers in debt of other payment options available to them.**
- **Suspension of the €200 gas PAYG to credit meter exchange fee.**
- **Reduction in the debt repayment level on Pay-As-You-Go meters from 25% to maximum 10%.**

Vulnerable Customer Register

The Vulnerable Customer register is a key tool in ensuring that the most vulnerable customers, those that are particularly vulnerable to disconnection, are protected from disconnection. The CRU has sought to promote the register to avoid disconnection, including requiring suppliers to also promote the register in Autumn 2022-2024, stating the benefits of registering as a vulnerable customer.

Customers have repeatedly been receptive to receiving these communications, reflected by the increases seen annually in registrations. By February 2025, the number of registered vulnerable electricity customers reached just under 102k, which is an 18% increase on what it was in February 2024, and a 109% increase on the number there were in August 2022 at the outset of the Measures. Similarly in the domestic gas market, the number of registered vulnerable customers in February 2025 was almost 31k, representing an 18% year-on-year increase, and an increase of 97% in the number of registered vulnerable gas customers that there were at the outset of the Measures in 2022 (see figure 10).

Financial Hardship Customers

The measures have also sought to promote and facilitate switches to credit plans from PAYG financial hardship customers. Suppliers have been required in their communications to their PAYG customers to inform them of alternative options, as well as the €200 fee for domestic gas customers to switch from PAYG to credit being suspended.

In the past winter, this has again seen further customers moving away from a PAYG financial hardship solution, despite increasing arrears levels, with a year-on-year drop of 4% in the number of electricity PAYG financial hardship customers, and 5% in the number of gas PAYG financial hardship customers.

While there continues to be a number of customers opting for a PAYG Lifestyle Choice solution (242k in electricity, 76k in gas), it is important that customers are aware that there is an alternative option to avoid self-disconnection (see figure 11).

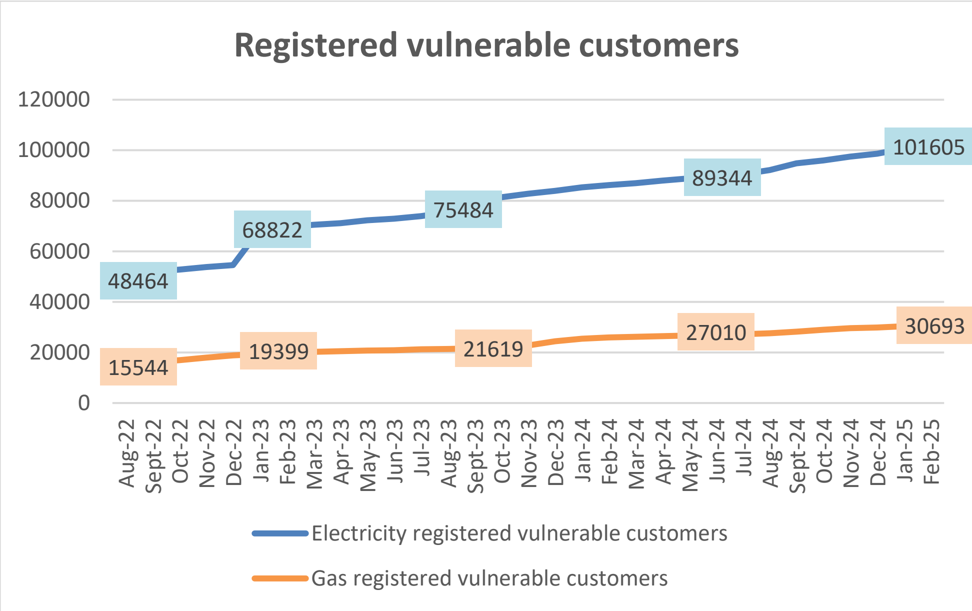

Figure 10: Registered Vulnerable Customers 2022-25

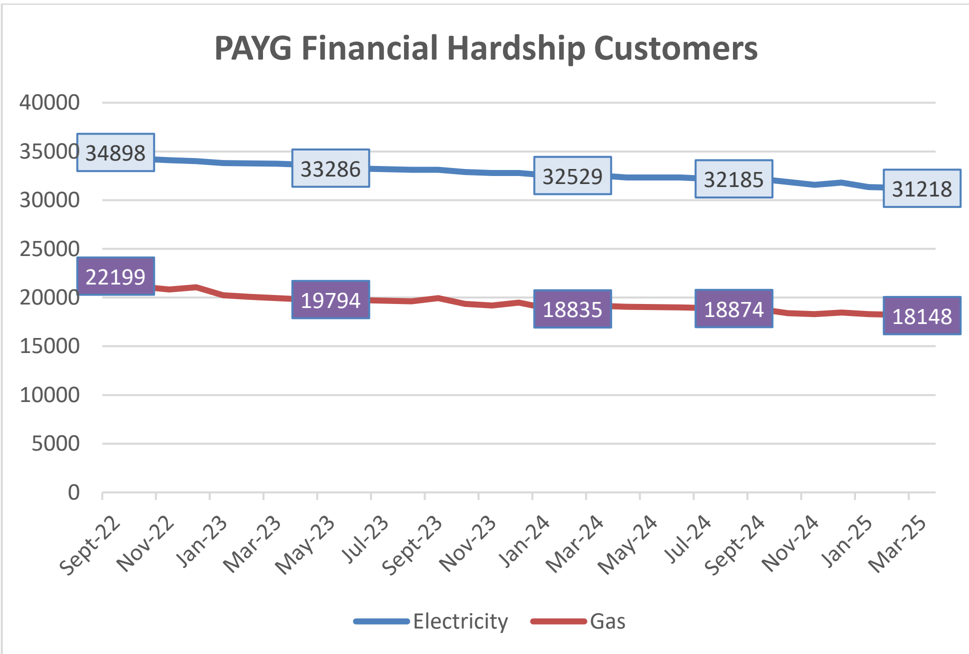

Figure 11: PAYG Financial Hardship Customers 2022-25

Other CRU measures introduced:

- **Suppliers required to waive any termination fee for any of their customers moving from a 24 hour tariff to a Smart tariff.**
- **Suppliers required to publish details of retention offers including relevant discounts for existing domestic customers on their website.**

The number of customers availing of Time of Use tariffs continues to grow, with a 47% increase observed in the year to March 2025 (see figure 12). However, this is likely due to the advancement of the Smart Meter roll-out and accompanying promotion of smart tariffs by suppliers rather than the waiver of termination fees for moving to a smart tariff as the Measures implemented. The number of customers renegotiating their tariff with their supplier has also remained strong over the past year, with 446k domestic electricity customers and 179k domestic gas customers contacting their supplier to get a better deal for their energy in the year-long period to March 2025 (see figure 13).

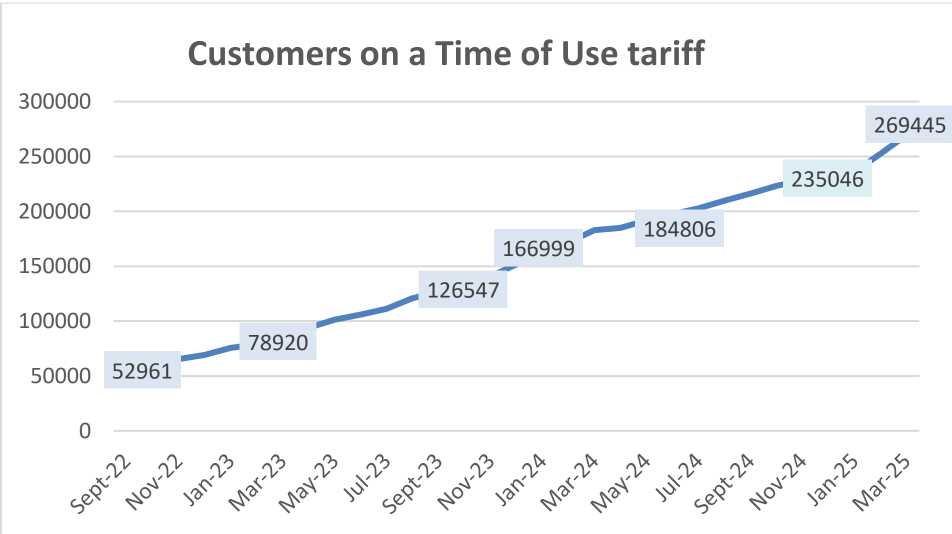

Figure 12: Customers on a ToU tariff 2022-25

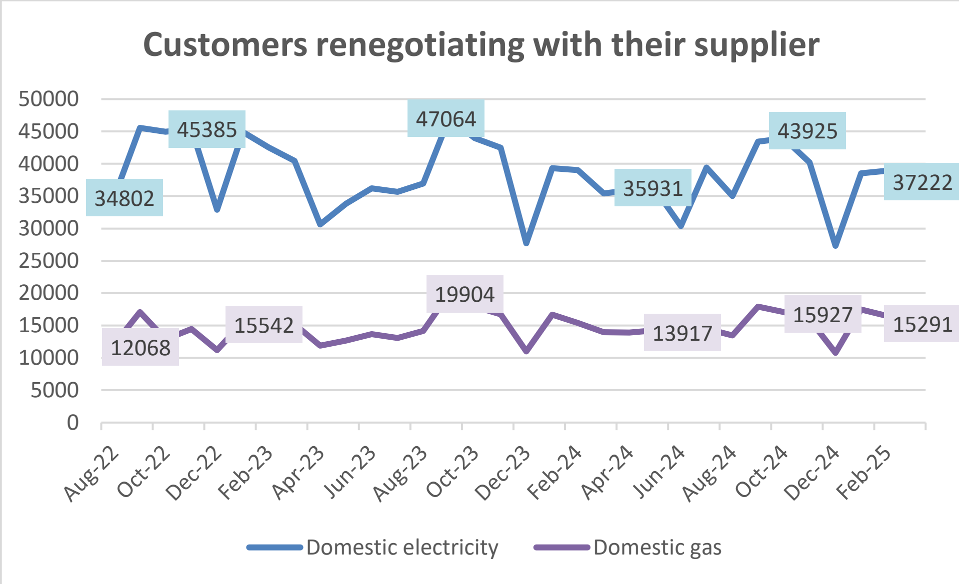

Figure 13: Customer renegotiations 2022-25

Finally, the remaining measures introduced, such as suppliers providing contact details to NGOs, improved training for supplier call center staff, and suppliers notifying their customers of how to register a nominated representative, cannot be measured via data received. In any case, feedback from NGOs has reaffirmed that channels of communication between NGOs and suppliers are functioning for the benefit of customers.

3. Requirements for Suppliers of Electricity and Gas Household Customers winter 2025/26

3.1 Introduction

As shown throughout sections 1 and 2, the measures have continued to offer an additional layer of protection to a customer base of which an increasing number are falling into arrears. The CRU is taking into account a number of factors, namely:

- Arrears levels: Worsening arrears situation in the past year with a combined 12% more accounts in arrears across both the domestic electricity and gas markets compared to last year (see figure 4 above).
- Retail prices: Have remained persistently high at around 70% and 100% higher than pre-crisis levels in domestic electricity and domestic gas standard tariffs respectively (see figures 1 and 2 above).
- Indications from Government suggest that Irish households are going to face into their first post-crisis winter without any universal supports on their energy bills.
- NGOs have reported very high levels of customer contacts in the last year.
- Supplier hardship funds have either ceased or paused.

Taking these factors into consideration, the CRU has decided that many of the Additional Customer Protection Measures will remain in place with some modifications.

Feedback from Suppliers

Feedback from suppliers regarding the effectiveness of the measures focused on two areas:

- the length of NPA disconnection moratoria and;
- the minimum repayment timeline to be offered to customers starting a repayment plan.

On the issue of disconnections moratoria, suppliers do not support a lengthened general moratorium (which would apply to all customers) as there were in winters 2022/23 (four months in length) and 2023/24 (two months in length), suppliers have shown the impact this has on customer arrears which are exacerbated their arrears levels in turn.

The CRU acknowledges the above and therefore a moratorium period of the same length as last year (six weeks) will apply to all NPA disconnections in this year's measures, as well as a five-month moratorium on NPA disconnections for any registered special services vulnerable customers (with priority service register vulnerable customers never being able to be disconnected). The CRU believes a moratorium of this length is balanced in terms of protecting households during the winter months at a time when their energy bills and other outgoing expenses would be highest, against a backdrop of continued high prices.

On the issue of repayment plans, the CRU has received feedback from members of the Customer Stakeholder Group regarding improvements that could be made to the repayment process which could lead to fewer broken repayment plans. These recommendations have been considered by the CRU and are now incorporated as requirements and recommendations for suppliers for winter 2025/2026. They are set out in Section 3.2 below.

Feedback from suppliers cite that the offer of a minimum repayment plan length of 18 months is not an optimum solution. However, the CRU acknowledges that the lower repayment increments resulting from a longer repayment timeline are still needed given the level of arrears on the market and continued high prices discussed earlier.

3.2 Measure No.1 Repayment plans – New Requirements & Recommendations

As mentioned in section 2, the CRU has observed an increasing proportion of repayment plans being broken over the past winter. Feedback from suppliers has clearly expressed that the option for customers to be offered a minimum 18-month repayment plan timeline contributed to this. However, as mentioned in section 3.1 above, the CRU also believes that improvements can be made on the suppliers' side which could reduce the number of repayment plans being broken. As such, the CRU is adding the following requirements and recommendations for suppliers when dealing with customers in arrears, for whom the supplier believes a repayment plan would be an appropriate solution, or for customers already on repayment plans who are struggling to meet the payments:

- Per section 5.3.3. of the Handbook, the customer's ability to meet the repayments must be the starting point for the terms of the repayment plan. In assessing the customer's ability to pay, suppliers must take into account as much information as provided by the customer as possible, including e.g. household income and disposable income, past energy expenditure, number of dependents in the household, recent changes in household circumstances (e.g. employment status, pregnancy, illness, bereavement), and other priority debts the customer may hold (e.g. to financial institutions, courts, taxes).

- Per section 5.3.5 of the Handbook lump sums are to be presented as an option rather than an obligation to customers.
- When laying out the terms of the repayment plan, suppliers must explain to the customer what their energy bills are likely to be during their repayment plan (i.e. repayment plan + typical bill into future). This is to ensure customers understand what they are signing up to.
- Suppliers must explain the repayment plan in terms of months to repay (as well as weeks). This is to ensure customers understand their outgoings on either weekly/monthly basis depending on their income circumstances. Any information, including webpages with information, regarding repayment plans must make clear that a customer can request a repayment plan of at least 18 months in length.
- Suppliers where feasible, should have a specialist contact within the supplier contact centre to deal with elderly people in difficulty paying bills.
- Suppliers should utilise a different approach to repayment plans for customers who find themselves in arrears after a one-off large bill, rather than customers who are in longer term or repeatedly in arrears. This may involve communicating with the customer to understand how the large bill occurred, offering advice on how this may be prevented again going forward, and offering a longer repayment timeline to the customer should the supplier feel it is appropriate.
- Suppliers should offer some level of flexibility to customers on when they are deemed to have broken a repayment plan, i.e. if the repayment is due a few days before their wages get paid then try to offer them some flexibility.
- Where a letter/email is sent to a customer regarding outstanding arrears, suppliers should ensure the team/contact they should speak to regarding arrears, is clearly specified.

3.3 Package of Customer Protection Measures 2025/26

Together with measure number 1 set out in section 3.2, set out below are the amendments to the 2024/25 measures for winter 2025/2026, as well as the full list of measures in the table below.

Measure No. 2 - Where a PAYG meter or budget controller is or will be being installed for a customer who has outstanding debt, suppliers must ensure that up to a maximum of 15% of a single customer vend can be attributed to debt recovery. This is to apply to all domestic PAYG customers.

Feedback from suppliers has shown that the current PAYG debt recovery rate of 10% can lead to customers remaining in arrears for longer, as less of their vends are contributing to paying-off arrears. As the PAYG debt recovery rate was previously 25%, the CRU feels it is now appropriate to increase the recovery rate to 15%. This means 15% of all new top ups/vends will be used to pay off arrears. The CRU will review whether this change helped PAYG customers in arrears next summer. It should be noted that this rate is still below its previous level of 25%.

Measure No. 3 - Suppliers are required to ensure that all customers with a financial hardship meter are automatically placed on the most economic tariff. This includes a tariff that might otherwise only be available to, for example, a new customer or a customer as a retention offer. The customer in financial hardship must be placed on whichever tariff is the cheapest.

Where there has been a Change of Legal Entity at a premises where a PAYG Financial Hardship meter is installed, the supplier is no longer obliged to place the new account holder on the most economic tariff automatically. Suppliers should assess any new customer in this scenario to determine financial hardship PAYG needs.

Measure No. 7 - The Christmas moratorium on disconnections for all domestic customers (for non-payment of account) will be from 8th December 2025 - 16th January 2026.

The forthcoming winter's NPA disconnection moratorium for all customers will be run for the same length of time as it did for winter 2024/25. This moratorium sits alongside the protection from disconnection being offered to customers through the supplier Energy Engage Code, which is a commitment made by suppliers to use disconnection as a last resort, as long as the customer continues to engage with their supplier.[8]

Measure No. 9 – Suppliers are required to send a reminder to inform all domestic customers of the eligibility criteria, how to apply, and the benefits of registering as a vulnerable customer via email/SMS, even where this is not the customers preferred method of communication, where the customer's email address or mobile phone number is available. Suppliers are also required to publicise information in this regard on their website and on their social media channels.

Suppliers must send a reminder to all domestic customers of the eligibility criteria, how to apply and the benefits of registering as a vulnerable customer, at the very latest, by 14 November 2025.

[8] https://eaireland.com/energyengagecode/

The table below provides the complete package of customer protection measures for winter 2025/26:

No.	Requirement	Implementation Date	Relevant requirement in the Handbook (if applicable)
Response 6 of the National Energy Security Framework: **Implement a package of measures to enhance protections for financially vulnerable customers and customers in debt including:** **Ensuring more manageable payment/debt repayment plans by extending the time for repayment**			
1.	Suppliers must make customers entering, or on, a payment plan aware of the option to extend the repayment plan to a minimum of 18 months (or longer should the supplier wish). The customer can repay in less than 18 months if they so wish. Per section 5.3.5 of the Handbook lump sums are to be presented as an option rather than an obligation to customers. Suppliers must follow the requirements / recommendations set out in Section 3.2 of this Decision.	Continuation from winter 2024/25	This is in addition to the existing Handbook requirements set out in Section 5.3 Payment Plans and specifically the below requirement. 5.3.3 A supplier should take account of the customer's ability to pay when agreeing any repayment arrangement, by credit or prepayment meter and confirm with the customer that arrangements are manageable.
Ensuring more manageable payment/debt repayment for customers on financial hardship prepayment meters			
2.	Where a PAYG meter or budget controller is, or will be, installed for a customer who has outstanding debt, suppliers must ensure that up to a maximum of 15% of a single customer vend can be attributed to debt	1 October 2025	This is a clarification of the existing Handbook requirement set out below. 8.1.6 (b) Where a PAYG meter or budget controller is being

	recovery. This is to apply to all domestic PAYG customers. This is implemented centrally in the gas market by Gas Networks Ireland. This is carried out through an increase to the Gas Allocation Rate across all PAYG meters. In the electricity market, this measure is implemented by suppliers.		installed for a customer who has outstanding debt, suppliers must ensure that up to a maximum of 25% of a single customer vend can be attributed to debt recovery.
Enhancing protection for financial hardship prepayment customers			
3.	Suppliers are required to ensure that all customers with a financial hardship meter are automatically placed on the most economic tariff. This includes a tariff that might otherwise only be available to, for example, a new customer or a customer as a retention offer. The customer in financial hardship must be placed on whichever tariff is the cheapest. Should a change of legal entity occur at the premise, the supplier is not obliged to place the new account holder on the most economic tariff available, should they be satisfied that the new account holder is not in need of a PAYG Financial Hardship meter following assessment.	Continuation from winter 2024/25	This requirement currently exists for registered vulnerable customers (Section 7.3.2). The CRU has decided to extend this requirement to customers in financial hardship.
Ensuring customers in debt are on a metering/payment plan that is suitable for them			
	The existing requirements set out within Section 5.3 Payment Plans in the Handbook cover this objective.		
Ensuring suppliers proactively identify customers in debt who should not be on prepayment meters and help them find other options			

4.	Suppliers are required to advise their prepayment customers in debt, of other payment options available to them. Suppliers are required to provide information in this regard on their website. Suppliers are reminded that it is not recommended that vulnerable customers are on prepayment meters.	Continuation from winter 2024/25	
5.	The suspension of the €200 gas meter exchange siteworks charge associated with a customer moving from a PAYG gas meter to a credit meter, for all domestic customers is to be continued. There is no siteworks charge associated with a PAYG electricity customer moving to a credit plan, as there is no meter removal in this instance. This is to be implemented centrally by Gas Networks Ireland.	Continuation from winter 2024/25	
Optimising the involvement of NGOs by ensuring all suppliers nominate specific contacts to support customers in debt			
6.	Each supplier is to continue to provide direct contact details of dedicated staff and/or teams to NGOs such as MABS, SVP and any other NGOs or agencies who represent customers. These direct contact details include, at minimum, a direct dedicated phone number and a direct dedicated email address.	Continuation from winter 2024/25	
Improving protection from disconnection for all domestic customers			

7.	The Christmas moratorium on disconnections for all domestic customers (for non-payment of account) will be from 8th December 2025 – 16th January 2026.	8th December 2025 – 16th January 2026	The Christmas moratorium is put in place by the CRU each year and usually applies from mid-December to mid-January.
Promoting greater awareness and uptake of supplier procedures for dealing with customers in, or at risk of energy debt			
8.	Suppliers are required to continue to provide appropriately trained call-centre staff to help them better identify customers in debt or facing debt, at an earlier stage. Training must provide instruction for call-centre staff to connect customers to the appropriately trained and experienced staff to deal with such customers. NALA's literacy-awareness training may be considered as part of this training.	Continuation from winter 2024/25	
Enhancing protection for vulnerable customers			
9.	Suppliers are required to send a reminder to inform all domestic customers of the eligibility criteria, how to apply, and the benefits of registering as a vulnerable customer via email/SMS, even where this is not the customers preferred method of communication, where the customer's email address or mobile phone number is available. Suppliers are also required to publicise information	14th November 2025	This is in addition to the existing Handbook requirement set out below. 7.3.3 The Code of Practice for Vulnerable Customers must be brought to the attention of customers via written or electronic communication sent to customers at least once a year and on sign up.

	in this regard on their website and on their social media channels.		
10.	Moratorium on disconnections for registered vulnerable customers for 2025/2026 will be from 1st November 2025 – 31st March 2026.	1st November 2025 – 31st March 2026	This is a clarification of the existing Handbook requirement set out below. 5.4.2 VII. Suppliers must specify where disconnection of a customer's supply will not be initiated by the supplier and must include as a minimum the following circumstances: During the winter months (1 November to 31 March) where a person appropriately registered with their supplier in accordance with the requirements of the Code of Practice for Vulnerable Customers;
11.	Emergency credit on all electricity and gas prepay meters should represent no less than €20 credit in total. This is implemented centrally on the prepayment meters/budget controllers by ESB Networks and Gas Networks Ireland.	Continuation from winter 2024/25	This is a clarification of the existing Handbook requirement set out below. 8.1.10 Emergency credit will be set on the prepayment meter/ budget controller by the Distribution System Operator or a qualified and accredited installer. Emergency credit should represent no less than €10 credit. The minimum amount of this credit will be approved by the CRU and may be varied from time to time.

12.	Suppliers are required to advise all domestic customers that they can have a 'nominated representative' to manage their account via email/SMS, even when this is not the customers preferred method of communication, where the customer's email address or mobile phone number is available. Suppliers are also required to publicise information in this regard on their website and on their social media channels. This communication can be included in the notification to customers on how to register as a vulnerable customer. On the same webpage, suppliers must also include information on eligibility and how to sign-up as a vulnerable customer, and how to sign-up for a level payment plan (should the supplier offer one).	Continuation from winter 2024/25	
Response 7 of the Framework: Supporting existing customers to access a competitive rate for their energy			
13.	Suppliers are required to publish details of retention offers including relevant discounts for existing domestic customers on their website.	Continuation from winter 2024/25	
Additional Requirements			
14.	Suppliers are required to waive any termination fee for customers moving from a 24 hour flat rate tariff to a smart tariff (whilst remaining with their current supplier).	Continuation on from winter 2024/25	
15.	Suppliers are required to directly notify customers of tariff increases at least 30 days' in advance via	Continuation on from winter 2024/25	This requirement does not apply to other changes in terms and conditions which

	email/SMS, even where this is not the customers preferred method of communication, where the customer's email address or mobile phone number is available. If the customer contacts the supplier to opt out of this communication, suppliers can cease to provide it. Tariff increases must also be communicated via at least one of the following methods: I. Website II. Mass media (i.e. TV, radio, newspaper advertisement) III. On or with the bill IV. Notification on the top-up.		should be notified to customers as per existing Handbook requirement below. 11.2.2 (J)The means by which the customer will be notified of any change in terms and conditions of supply, including 30 days' notice in advance of those changes taking effect and the existence of the right of withdrawal where there is a material change to the terms and conditions; The means must include, at minimum, at least two of the following methods: I. Website II. Mass media (i.e. TV, radio, newspaper advertisement) III. On or with the bill IV. SMS text message, email, letter V. Notification on the top-up

4. Reporting

For measure number 9, suppliers must send a reminder to all domestic customers of the eligibility criteria, how to apply and the benefits of registering as a vulnerable customer, how to have a 'nominated representative' and how to sign-up for a level payment plan (if applicable) at the very latest, by 14th November 2025 as noted in section 3.3.

The CRU requires that suppliers confirm implementation of measures 1, 3, 4, 6, 8, 12 and 13 by 3rd November 2025, by communicating steps employed to implement the measures to retaildata@cru.ie. The CRU will also continue its regular market monitoring to evaluate the effectiveness of the Measures.

5. Conclusion & Next Steps

As outlined throughout this document, while it is now three years since the peak of the energy price crisis, the problems have not sufficiently abated for the measures to be rolled-back any further than they are for the forthcoming winter. Metrics such as arrears levels, customer contacts to NGOs seeking assistance and energy voucher take-up over the past year show that high numbers of customers are in a persistent struggle with their energy bills

The CRU seeks to balance the need to protect customers in a time of high arrears, retail prices and uncertainty regarding Government supports, with the need to maintain the principles of a competitive energy market which in turn benefits customers.

Unless stated otherwise, the measures in this paper remain effective until another CRU review in summer 2026.

The CRU would finally like to thank both suppliers and members of the Customer Stakeholder Group for their feedback provided, and for their ongoing support and work in implementing the measures.