



Department for
Business, Energy
& Industrial Strategy

Non-domestic Alternative Fuel Payment Scheme

Guidance for non-domestic Electricity
Suppliers in Northern Ireland

WITHDRAWN

6th February 2023

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1 The Non-Domestic Alternative Fuel Payment Scheme

- 1.1 The Non-Domestic Alternative Fuel Payment (ND AFP) is a scheme which forms part of the government's cost of living assistance package for non-domestic consumers over winter 2022 to 2023.
- 1.2 The ND AFP provides non-domestic customers in Northern Ireland with a £150 payment. For identified eligible customers with a relationship with a non-domestic supplier, this will be delivered by electricity suppliers in February and March 2023. These customers do not need to apply for this payment.
- 1.3 This Guidance is provided by the Department for Business Energy and Industrial Strategy (BEIS) to support non-domestic electricity suppliers to support electricity suppliers to deliver the ND AFP to eligible customers.
- 1.4 Non-domestic customers using alternative fuels in Great Britain will receive a payment through the Great Britain ND AFP scheme, details of which can be found here: <https://www.gov.uk/government/publications/non-domestic-alternative-fuel-payment-scheme-great-britain-guidance-for-electricity-suppliers>
- 1.5 A top-up payment in addition to the £150 will be available for large users of heating oil (kerosene) in Great Britain and Northern Ireland to take account of their higher usage. These top-up payments will require an application and will be banded based on level of usage. The highest users will receive a bespoke payment corresponding to the actual quantity of heating oil used.

2 Legal and regulatory framework

- 2.1 The Secretary of State for Business, Energy and Industrial Strategy has made a Direction under section 22 of the Energy Prices Act 2022 - the ND AFP NI Direction.
- 2.2 The Direction can be found at <https://www.gov.uk/government/publications/non-domestic-alternative-fuel-payment-scheme-northern-ireland-ministerial-direction> .
- 2.3 The Direction comes into force on 8th February 2023 and has effect for one year, with the period for all payments to be completed on 30 June 2023.
- 2.4 This Guidance is issued by the Secretary of State for Business, Energy and Industrial Strategy (BEIS) to non-domestic electricity suppliers – a person who holds a licence under section 6(1)(d) of the Act and who supplies or intends to supply electricity to non- domestic customers – to support the implementation of the scheme.

The role of UREGNI in the ND AFP

- 2.5 UREGNI have contributed to this Guidance in line with their ND AFP responsibilities.
- 2.6 The Direction from the BEIS Secretary of State will set out the suppliers' obligations in delivery of the scheme.
- 2.7 BEIS will alert UREGNI if there is evidence to suggest that the Direction has potentially been breached, under the UK Energy Prices Act (and subsequent secondary legislation), by an electricity supplier in the ND AFP. If there is evidence of a breach UREGNI will engage in enforcement action under the terms of their enforcement procedure.
- 2.8 UREGNI will make the decision on whether to enforce or not enforce, in line with the principles outlined in the enforcement procedure. UREGNI will treat any breach of the direction as a breach of a relevant requirement.
- 2.9 If it was determined a breach had occurred, proportionate and appropriate action would be taken by UREGNI pursuant to their Enforcement Policy.
- 2.10 UREGNI cannot provide advice on operational management issues including the specific arrangements a supplier puts in place to implement the ND AFP. Nor can they complete any reporting documentation on behalf of a supplier.

Contact

2.11 The BEIS ND AFP team can be contacted at ndaftp@beis.gov.uk

Data sharing and data privacy

2.12 BEIS may share with UREGNI the number of customers each non-domestic electricity supplier has provided with the £150 payment in the form of aggregate level reporting data. This information sharing may be necessary for the purpose of enabling UREGNI to monitor and enforce compliance.

2.13 A privacy notice will be published on Gov.UK shortly.

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3 Customer eligibility

- 3.1 To be eligible for the £150 ND AFP payment the premises must be non-domestic, with an active, energised, electricity meter reading above zero electricity use within the past 12 months (23rd January 2022 to 22nd January 2023).
- 3.2 There is to be one payment per unique address.
- 3.3 Non-domestic electricity suppliers will be provided with a list of Meter Point Reference Numbers (MPRNs) by the Distribution Network Operator (DNO) in Northern Ireland which may be eligible to receive support under the scheme based on analysis of their records. This will then be confirmed through a collaborative process between the DNO and suppliers.
- 3.4 Non-domestic electricity suppliers in Northern Ireland are instructed to distribute these payments to eligible customers that are supplied electricity to.
- 3.5 Non-domestic suppliers are not responsible for paying any customer who does not correspond to a provided MPRN, regardless of their relationship with this customer.
- 3.6 A top-up payment will be available to 'large users' of heating oil (kerosene) in non-domestic properties. Further details on this scheme will be provided in due course.

Data matching

- 3.7 To identify eligible customers, Northern Ireland Electricity Networks have extracted a relevant list of MPRNs for each supplier, identifying non-domestic premises to receive automatic payments for the ND AFP using the eligibility criteria.
- 3.8 Suppliers will then be asked to identify which of these MPRNs were their customers on the qualifying date of 22nd January 2023 and conduct checks based on their own records to confirm these customers are indeed eligible for support under the scheme.
- 3.9 For the purpose of the scheme, eligibility refers to only one contract (or deemed contract) per designated premises.

- 3.10 Where there are multiple meter points at a single unique address, Northern Ireland Electricity Networks in collaboration with electricity suppliers will aim to provide the AFP support to a single meter point in the property.
- 3.11 For accounts where two-meter points serve two separate occupied designated premises, both meter points should receive an ND AFP payment.
- 3.12 Suppliers will then provide the DNO with a list of MPRNs that they believe to be eligible for support under the scheme. The DNO may conduct further reasonable checks on this information. Once confirmed – BEIS will provide a payment to each supplier equal to their number of eligible customers multiplied by £150.
- 3.13 Non-domestic electricity suppliers are asked to deliver the £150 payment to their eligible customers by 10th March 2023.
- 3.14 Once suppliers have provided their customers the payment, or just before, they will need to email or post a letter using the template letter in Annex D or communicate in some other way with their customer to inform them they have received the £150 payment. The arrival of the payment in the account can also be included as a line on the bill if that is possible.
- 3.15 Where non-domestic suppliers have a customer who is on a pre-payment meter, they are asked to provide that customer with a cheque to the value of £150.
- 3.16 If an eligible customer switches supplier after 22nd January 2023 and before the £150 is paid to them by 10th March 2023 then the customer should be given £150 in the rebalancing of their account.
- 3.17 Suppliers are not responsible for paying any customer who does not correspond to a provided MPRN, regardless of their relationship with this customer.
- 3.18 After the cut off date on 10th March 2023, there will be a reconciliation process carried out where non-domestic suppliers will be asked to provide evidence they have provided their eligible customers with the £150 payment. The number of payments made to eligible customers will be checked against the original calculation of eligible customers agreed between individual non-domestic electricity suppliers and the DNO. Where additional funding is owed to suppliers it will be transferred by BEIS and where fewer payments have been made by suppliers to their customers then that funding, plus interest accrued on the bank account will need to be repaid to government.

- 3.19 Once this reconciliation process has been completed there will be an audit carried out by a third party.

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4 Operations

- 4.1 Suppliers are required to provide administrative and readiness information and prior to delivery of the scheme.

Deed

- 4.2 The BEIS Terms of ND AFP Deed sets out the terms under which BEIS will make payments pursuant to the Direction.
- 4.3 The Deed must be signed by a senior person such as the supplier Finance Director or CEO (or equivalent). The signatory may provide an e-signature or an ink signature scanned into a PDF.
- 4.4 The signed Deed must be returned to BEIS by email to energyprocessing@beis.gov.uk and copy in AP1BillinghamFinance@uksbs.co.uk by 8th February 2023.

Supplier information

- 4.5 Supplier information, as set out in Annex A, is required to support the administration of the scheme and is requested to be reported to BEIS by 8th February 2023.
- 4.6 For the purpose of administering the scheme suppliers are required to appoint and provide details of the following people:
- a. Their Finance Director – who may be a person with this job title or a person in a similar senior financial role or a senior director role.
 - b. The Responsible Person – who has overall supplier responsibility for delivering the scheme. This should be someone in the company with sufficient understanding of and authority over relevant supplier systems and processes to ensure delivery of ND AFP, as well as sufficient and appropriate authority to sign off reporting submissions to ensure the supplier meets their obligations under ND AFP.
 - c. The Senior Compliance Officer – who is required to complete internal assurance and must be independent and not under the Direction of the Responsible Person. They need to be of the appropriate authority to sign off the requested reporting submissions and will be held accountable for the accuracy and validity of the content.

- They can either be part of an internal audit or assurance function and/or an individual who is both independent (of scheme delivery) and capable. To ensure the internal assurance declaration has validity the Senior Compliance Officer must be a separate individual from the Responsible Person, as the Responsible Person should not audit their own work.
 - Independent in this context means an individual who has appropriate authority and independence from the Responsible Person. They must be able to question the accuracy of the return and have the authority to do so.
 - Capable in this context means an individual who is sufficiently competent to undertake verification, to understand the supplier obligations under ND AFP, and who understands the ND AFP reporting requirements. There is no requirement for this person to be a qualified auditor or hold Consultative Committee of Accountancy Bodies (CCAB) qualifications.
- d. The person responsible for the day-to-day administration of the scheme – who can be any person chosen to receive and be responsible for all correspondence with BEIS on scheme delivery.
- 4.7 Suppliers should also provide details of those persons who will require access to the Data Management System (DMS) to submit scheme reporting.
- 4.8 Suppliers should inform BEIS if their supplier information changes at any time.

Supplier bank account

- 4.9 Suppliers are required to hold a qualifying bank account to receive and administer ND AFP funding. This may be a new account or an existing one – but must be solely dedicated to receiving funds under the ND AFP.
- 4.10 A qualifying bank account must be a bank account in the name of the non-domestic electricity supplier with a bank in the United Kingdom which will be maintained separately from the supplier's other bank accounts and into which only ND AFP monies will be paid.
- 4.11 Ahead of the payment, suppliers should provide a letter signed by their Finance Director (see 4.5) confirming their bank account details by 8th February 2023. This should be returned to BEIS with the initial solvency

statement (see from paragraph 5.6). A template declaration can be found at Annex C.

- 4.12 Suppliers must not release or transfer monies out of the qualifying bank account for any purpose other than providing the ND AFP payment to an eligible customer or returning funds to BEIS when requested.
- 4.13 Any interest accrued or balance held must be returned to BEIS as part of the scheme reconciliation. Any charges made to the account are not eligible for reimbursement from ND AFP funds and equivalent funds must be reimbursed to the account by the supplier.
- 4.14 This account must remain active until the final scheme reconciliation has been completed and this has been confirmed in writing by BEIS.

Supplier information notifications

- 4.15 Suppliers are required to submit the following information to BEIS via ndafp@beis.gov.uk by 10th March 2023:
- A description (including a payment schedule) of how you have provided an ND AFP payment to your eligible customers who are prepayment customers, direct debit customers and credit customers.
 - How you have identified and recorded the number of eligible customers who you have not provided a ND AFP payment by the cut-off date on 10th March 2023.
 - A description of how you notified your eligible customers who are prepayment customers, direct debit customers and credit customers of their eligibility for the £150 ND AFP payment.
 - A description of how the non-domestic electricity supplier has verified its ineligible customers from the DNO list.
 - A description of any systems you have developed and testing you carried out before delivering the ND AFP payment.
 - A description of any management processes put in place by you to oversee compliance by you with your obligations under the Direction.
 - A description of the measures taken by you to prevent fraud, misuse or abuse while providing the ND AFP payment to your eligible customers.

- How you are carrying out the internal audit following the cut off on 10th March 2023? What type of evidence you will include in this report?

Managing the risks of fraud

- 4.16 The government will not accept any manipulation or fraud within this Scheme. Any allegation or suspicion of fraud, misuse or abuse will be treated seriously.
- 4.17 Suppliers must maintain business as usual fraud detection, prevention, reporting and recovery processes and procedures that are proportionate to and appropriate for ND AFP scheme delivery.
- 4.18 If suppliers detect any attempted or actual fraud or misuse of public monies by an internal actor, customer group or third party, they should immediately report it to ndaafp@beis.gov.uk to ensure this intelligence can be signposted appropriately for the development of control measures.
- 4.19 Supplier bank accounts will be checked using control measures including the government's digital due-diligence tool Spotlight to ensure funds are held safely and in line with the requirements of the Direction. Suppliers will also be required to confirm to BEIS their supplier bank account that the ND AFP payment funding will be paid (see paragraph 4.9).

5 Providing the ND AFP payment to suppliers

- 5.1 BEIS will provide each supplier with the funding required to provide the ND AFP to all their eligible customers.
- 5.2 Funding will be paid to suppliers as soon as possible in February 2023, provided the supplier has provided the required information.
- 5.3 The supplier is responsible for ensuring that the funds are used for the sole purpose of providing ND AFP to eligible customers. Suppliers must not retain any payment funding to reimburse costs incurred or for any other purpose.
- 5.4 Funding will not be provided to suppliers for scheme administration. Scheme implementation may cause suppliers to incur costs, whilst providing benefits in other areas of their organisation.
- 5.5 The ND AFP will close for delivery on 30th June 2023. Any funds provided to suppliers and not dispersed by the scheme closing date of 30th June 2023 must be returned to BEIS (see paragraph 14 of the Direction on overpayments).

Solvency statement

- 5.6 To receive payment from BEIS each supplier is required to provide a declaration signed by their Finance Director or someone in a similar role (senior financial role or senior director) by 8th February 2023.
- 5.7 The declaration must confirm that an insolvency event has not occurred and that, having made reasonable enquires, the Finance Director is not aware of any circumstances that could reasonably be expected to give rise to such an insolvency event during the calendar month in which the declaration is given in or in the immediately following calendar month.
- 5.8 An alternative provision will be put in place for any supplier operating under a Special Administration Regime (SAR), details of which will be communicated to them.
- 5.9 This declaration must be dated Wednesday 8th February 2023.
- 5.10 The declaration must be provided no later than 12:00 hours on Wednesday 8th February 2023 or there is a risk of not receiving the ND AFP payment.

The declaration must be submitted to ndafp@beis.gov.uk. A template can be found at Annex C.

- 5.11 After signing the solvency statement, if a supplier is concerned about the potential of an insolvency event taking place then they should email ndafp@beis.gov.uk as soon as possible.

Calculating payments to suppliers

- 5.12 The payment to suppliers will be based on the number of eligible customers the supplier will be required to make the ND AFP to.
- 5.13 Suppliers are expected to provide the estimated number of qualifying customers on the qualification date of 22nd January 2023 based on their energised meter data.
- 5.14 Suppliers will receive 100% of the estimated funds for the ND AFP.
- 5.15 The figure going to each supplier will be communicated by BEIS to the suppliers in advance of the payment date, giving the supplier an opportunity to review and raise any error before the payment is issued.

Payment reconciliation

- 5.16 Following the closure of the scheme on 30th June 2023 a final audited reconciliation will take place, allowing for confirmation of final expenditure under the scheme and reimbursement to suppliers of any balance due or repayment of undispersed balance to BEIS.
- 5.17 To complete the scheme reconciliation, a final end of scheme report must be submitted to BEIS by 31st July 2023 (see from paragraph 8.1).
- 5.18 The information provided in the report will be used by BEIS to fully reconcile actual payments made under the scheme against estimated allocations provided to suppliers.
- 5.19 Following the completed reconciliation BEIS will write to suppliers confirming:
- a. The total allocation of payment made to the supplier.
 - b. The value of eligible payments delivered.
 - c. The balancing figure for remittance or recovery.

- 5.20 Any undispersed funding resulting from monies which exceed the payment delivered will need to be returned to BEIS in full within 5 working days of the receipt of the reconciliation notification. The notification will provide full details of how to make any payment.
- 5.21 Suppliers are not expected to make any payment to BEIS ahead of receiving a reconciliation notification request and should not routinely expect to make any repayment before the scheme closure, except if this is required on an exceptional basis.

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6 Providing the ND AFP to customers

- 6.1 Suppliers are responsible for paying all eligible customers (see section 3 and below).
- 6.2 Customers already in receipt of the £400 Energy Bills Support Scheme (EBSS) and the £200 Alternative Fuel Payment (AFP) who have only a domestic MPRN are not eligible for a payment under this scheme.
- 6.3 Non-domestic electricity suppliers will be provided with a list of MPRNs by the DNO which may be eligible to receive support under the scheme based on analysis of their records. This will then be confirmed through a collaborative process between the DNO and suppliers.
- 6.4 Suppliers are not responsible for paying any customer who does not correspond to a provided MPRN, regardless of their relationship with this customer.
- 6.5 The ND AFP will be delivered by electricity suppliers as a payment on electricity bills. It must be delivered by 10th March 2023. Providing the payment to eligible customers.
- 6.6 The payment will be provided in the form of credit to the customer's account, refund or cheque. With some customers paying their bills quarterly this means they will have been credited the payment in the scheme period but won't receive it until their quarterly bill date.
- 6.7 Suppliers should provide the ND AFP to all eligible customers as soon as possible within the scheme period and must have provided the ND AFP by cut-off date of 10th March 2023. Where this has not occurred suppliers should follow the process for outstanding customers.
- 6.8 Where a supplier provides other services to a customer alongside energy as part of a bundled account, they may apply the ND AFP to the bundled account, provided the customer has not elected otherwise.
- 6.9 For all customer and payment types suppliers must retain sufficient records to evidence each ND AFP payment being provided, as per the compliance, audit and assurance requirements of this Guidance and must report on these payments by customer and payment type.
- 6.10 Where a customer uses a combination of payment types the supplier should provide the ND AFP payment once only, applying it to the primary method of payment.

- 6.11 Where a customer's payment type changes mid-month, and before an ND AFP payment is provided, the supplier should provide the ND AFP payment in accordance with the new method of payment.
- a. Crediting the energy account by an amount equal to the ND AFP payment; or.
 - b. Reducing the amount (including Value Added Tax) charged to the customer by an amount equal to the ND AFP payment.

Value Added Tax

- 6.12 When applying the £150 ND AFP payment to eligible non-domestic customers' accounts electricity suppliers are asked to treat customers with credit on their account (at or above £0.00 credit) and those in debt (below £0.00 credit) differently regarding the application of Value Added Tax (VAT). If a customer is in credit (at or above £0.00) on their electricity account then pay the customer £150. Where the money is paid direct to the customer in cash no tax point arises as the money is at no point consideration for a supply.
- 6.13 If an eligible customer owes money on their electricity bill (i.e. their account is below £0.00) then first deduct £150 from the final balance the customer owes for their electricity bill and taxes and then pay the remaining balance to the customer. For example, if a customer owes £100 in electricity charges with VAT at 20% then the total amount the customer owes is £120. As the ND AFP payment is £150 and £120 is owed from the customer to the electricity supplier then this means the customer is paid £30 ND AFP payment. Payments made under the scheme into the customers energy account are regarded as third-party payments from the Government. Energy suppliers are required to account for VAT under the normal rules as the payment is made for a taxable supply of energy.

ND AFP payment by type

Direct Debit

- 6.14 A fixed Direct Debit customer is a customer who agrees to pay by way of regular Direct Debit payments of a fixed amount (which amount may be varied from time to time), to spread the cost of uneven monthly consumption over 12 equal payments.

- 6.15 For fixed Direct Debit customers, the supplier should provide the £150 ND AFP payment by one of the following methods:
- a. Reducing the amount (including Value Added Tax) collected from the customer by an amount equal to the ND AFP payment; or
 - b. Providing a refund to the customer equal to the ND AFP payment, following the normal collection of a Direct Debit payment; or
 - c. Providing a payment to the customer or credit to the customer's energy account equal to the ND AFP payment.
- 6.16 Where a supplier chooses to provide a refund, this should be provided as soon as reasonably practicable. Where it is possible, the refund should be provided immediately, and in all cases, suppliers should endeavour to provide the refund as soon as possible after the Direct Debit is collected from the customer.
- 6.17 Where it is not possible to provide the refund by 10th March 2023 the supplier must follow the process for outstanding customer (see paragraph 6.26) and provide any outstanding AFP to the customer as soon as possible.
- 6.18 Where a refund or reduction equivalent to the full value of the ND AFP is not possible because the ND AFP is greater than the amount of the customer's Direct Debit, a credit should be made to the energy account of an amount equal to the balance between the ND AFP and the amount reduced or refunded. This could include putting the customer on payment holiday (by reducing the Direct Debit to £0) and crediting the account by the balance of the ND AFP amount.

Variable Direct Debit

- 6.19 A variable Direct Debit customer is a customer who pays by way of regular Direct Debit payments of a variable amount, paying outstanding charges to their account in full.
- 6.20 For variable Direct Debit customers, the supplier should provide the ND AFP payment by one of the following methods:
- a. Crediting the energy account by an amount equal to the £150 ND AFP payment; or
 - b. Reducing the amount (including Value Added Tax) charged to the account by an amount equal to the £150 ND AFP payment.
 - c. Providing a payment to the customer or credit the customer's energy account equal to the ND AFP.

Pre-payment meter

- 6.21 Where non-domestic suppliers do have pre-payment customers they are encouraged to either provide these customers with a cheque to the value of £150.

Bundled accounts

- 6.22 Where a non-domestic customer has a bundled contract they may have the £150 ND AFP applied to their bundled energy account rather than their energy account.

Customers in arrears and debt

- 6.23 While the principal aim of ND AFP payment is to support people with ongoing energy costs, the £150 ND AFP payment may be used to reduce arrears and debt balances in certain circumstances, where customer accounts are in debt and arrears. This applies both where a customer has a debt repayment and where there is no repayment arrangement in place.
- 6.24 Customers in arrears are customers who have bills which remain outstanding for longer than 91 days or 13 weeks after they are issued, and who have not yet set up a debt repayment arrangement. Where a customer account is in arrears, the ND AFP payment can reduce these arrears, where an ND AFP payment is applied or partially applied to an energy account.
- 6.25 Suppliers should make it their priority to work actively to move customers with large arrears balances onto debt repayment plans wherever possible.

Ensuring payments are delivered

- 6.26 Suppliers are expected to take all reasonable steps to ensure the £150 ND AFP payment is provided and delivered. The ND AFP payment is provided when a supplier applies a credit, sends a refund or provides payment of the ND AFP to an eligible customer. Delivery is confirmed when the customer has received the financial benefit of the payment (e.g. when an account balance is credited or cheque cashed).
- 6.27 To demonstrate that reasonable steps have been taken to deliver the payment to customers that have been issued with a cheque that has not been cashed and make a minimum of two attempts to contact customers who have not redeemed their payment to encourage the customer to take action.

Outstanding customers

- 6.28 Suppliers must make all reasonable steps to provide ND AFP to their eligible customers by 10th March 2023.
- 6.29 There may be some non-domestic customers on pre-payment meters who would not be able to receive the £150 payment in the same way as a Direct Debit or credit customer. Non-Domestic suppliers are asked to provide those customers £150 through a cheque making sure they have been accounted for in the record of payments made through the ND AFP.
- 6.30 If it is not possible to provide a cheque to the value of £150 then pre-payment meter customers can be directed to apply for the payment through the ND AFP Top up Scheme. Details on this scheme are expected shortly.
- 6.31 In the case of all outstanding customers the supplier should be prepared to evidence the steps taken to provide the £150 ND AFP by 24th March 2023. This includes:
- The number of outstanding customers
 - The reason why the non-domestic electricity supplier has not provided a £150 ND AFP payment to the outstanding customers, including the number of exception cases of each category; and
 - Summary of what steps suppliers are taking to reach those customers.

Exceptions

- 6.32 An exception case is where the non-domestic electricity supplier, having taken all reasonable steps to do so, cannot provide the £150 ND AFP to a person whom it has determined is an eligible customer.
- 6.33 In these cases, having demonstrated a reasonable attempt to pay, a supplier should classify the outstanding customer as an exception case. Once classified as an exception case the supplier is not required to continue to take steps to provide the £150 ND AFP.
- 6.34 An exhaustive list of exception cases can be found at Annex E. These are:
- No forwarding address.
 - Supplier has no name of eligible customer.
 - Vacant property on qualifying date.

- Premises are disconnected.
- Change of tenancy.
- Erroneous transfers.

6.35 Where a customer meets more than one exception case category the supplier may choose which exception to apply and report on.

6.36 Where a supplier identifies an exception case not covered by the exhaustive list, they should contact BEIS explaining their case for proposing an exception. BEIS will consider the case, and if necessary, update the Guidance and Direction.

6.37 As part of the end of scheme reporting suppliers will be required to document the total number and category of exception cases.

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Final payment date

- 6.38 Non-domestic electricity suppliers are asked to provide the £150 ND AFP to all their eligible customers by 10th March 2023. Any funding that does not reach a customer by 23:59 on 30th June 2023 for any reason must be returned to BEIS through the reconciliation process. This includes where a cheque to a pre-payment meter customer was not cashed.
- 6.39 All monies must be fully defrayed from the supplier bank account by 23:59 on 30th June 2023. Any monies paid to customers after this date will not be reimbursed under this scheme and the supplier will be liable for this amount.
- 6.40 The only exclusion is where a non-transferable cheque has been cashed after the scheme closing date of 30th June 2023. In this case suppliers may submit a supplementary reconciliation claim for reimbursement. All claims for supplementary reconciliation should be submitted by 5th January 2024.

Communicating the ND AFP

Communicating that an ND AFP has been provided

- 6.41 Customers must be informed in writing (paper or electronic) when the ND AFP £150 has been provided. This communication may be on the customers next bill or statement of account or otherwise.
- 6.42 At a minimum, the communication must specify that the customer has been provided with a £150 ND AFP payment and that the ND AFP is a payment by His Majesty's Government that has been applied to reduce the customer's charges in an amount equal to the ND AFP.
- 6.43 Suppliers are required to confirm that this communication has taken place or will take place in line with the existing frequency of providing a customer bill or statement, as part of the reconciliation and compliance report.
- 6.44 This communication should be provided using the most relevant and timely business as usual communication approach, and/or in line with the existing frequency of providing a customer bill or statement, which will not always be monthly.
- 6.45 This could include a line on the customer bill, an email or by using the letter template in Annex D which can be populated and sent by email or the post to eligible customers.

Wider communications

- 6.46 Suppliers should use all available channels to communicate the scheme to customers, for example through bills, app, website, social media etc.
- 6.47 Suppliers will be asked to report on the channels and regularity of communications they send to customers and to make an assessment of how far the scheme has been understood.

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7. Control point compliance assessment

- 7.1 To ensure compliance with the requirements of the scheme, suppliers are required to engage with the following compliance, assurance and audit processes:
- Control point compliance assessment
 - Audit and assurance programme
 - End of scheme compliance assessment
- 7.2 Suppliers should take care to ensure that the information contained in reports or assessments is accurate, justifiable and supported by evidence. It is a supplier's responsibility to ensure it has appropriate systems, management controls and senior management oversight in place to ensure that eligible customers are accurately identified and recorded.
- 7.3 Suppliers should retain all documentary evidence for a minimum of 7 years from the date of the £150 ND AFP payment. This may include (but is not limited to): customer number reports and calculations, customer billing system records, individual customer bills, internal governance reports, reporting from third party service providers and copies of correspondence with customers. This is for the purposes of delivery, reconciliation, audit, assurance, compliance and enforcement, and monitoring and evaluation of the ND AFP. These records will be subject to external audit.

Control point compliance assessment

- 7.4 A control point is a step in the ND AFP delivery process against which BEIS will be measuring supplier's compliance. The control points inform the data requirements and reporting obligations for the scheme.
- 7.5 Control points differ depending on the process of providing the AFP (therefore by payment type). Suppliers are expected to retain evidence, at an individual customer account level, to be able to demonstrate having met each control point set out in Annex F.
- 7.6 To report a payment as delivered the supplier should fulfil the control points set out in Annex F.

7.7 Although BEIS will not ask to see such evidence on a regular basis, it may require such evidence as part of scheme spot-checks or compliance deep dives or as part of scheme audit.

Compliance assessment levels

7.8 BEIS will monitor supplier compliance in several ways, including:

- a. Regular engagement and bilateral meetings - during February and March 2023 to check in on supplier progress and understand concerns or issues in delivery of the AFP.
- b. Initial and final end of scheme reports submitted by suppliers.
- c. Initial and final internal audit report submitted by suppliers.
- d. Further assessments as necessary - these assessments, which may include further assessment of the outstanding customers reporting and a request for supplier remediation plan, will help BEIS to understand the underlying cause(s) of supplier under-performance or non-compliance and their mitigating actions and plans in further detail. Requests for information to these assessments will be issued by BEIS directly and tailored to the nature of underperformance in delivering the ND AFP.

7.9 If and where required, suppliers will be notified that further compliance action is initiated, through receipt of a Remediation letter, from BEIS.

7.10 Compliance assessments will be initiated where a supplier is underperforming in delivering the ND AFP to customers. BEIS will use the outstanding customers segment of the reconciliation and compliance report to understand gaps in delivery. BEIS may also request a remediation and recovery plan to understand how the supplier will catch-up on ND AFP delivery.

7.11 Where ND AFP delivery targets are not met over a sustained period or where a supplier is materially behind their target, it will be BEIS' objective to understand and the supplier's obligation to set out what mitigation actions have been taken and what further action is planned to resolve non-compliance. This may result in enforcement action being considered by Ofgem.

7.12 The exact information to be requested for compliance assessments will be informed by the nature of non-compliance observed. Suppliers should take care to ensure that the appropriate systems and processes are in place to accurately record and retain such data.

- 7.13 BEIS do not anticipate these compliance assessments to be a standard course of action and anticipate that most suppliers will meet delivery targets and obligations, as evidenced through the initial report.

Audit and Assurance Programme

Internal assurance

- 7.14 Suppliers must provide internal independent assurance on the accuracy of the information submitted in the initial report and the end of scheme report. Suppliers must submit an internal audit report as part of the submission of both documents, the initial report by 24th March 2023 and final report by 31st July 2023.
- 7.15 The internal assurance will be undertaken by an appointed Senior Compliance Officer, who can either be part of an internal audit or assurance function and/or an individual who is both independent (of scheme delivery) and capable.
- 7.16 The purpose of the internal assurance is to provide assurance to [the Authority] of the accuracy of the information submitted the end of scheme report. This is used as evidence within the compliance assessment to determine if the supplier has delivered in line with their reporting obligations.
- 7.17 If an internal audit report is not submitted with the end of scheme report, the supplier will be contacted to arrange for the submission of the document. If the supplier continues to not provide this report the supplier may be found non-compliant and face possible enforcement action.
- 7.18 Each supplier declaration should contain assurances for each of the data points detailed in the interim and final end of scheme reports and internal audit report including, but not limited to, the following assurances:
- a. Confirmation that the number of eligible customers on the qualifying date has been accurately reported and is supported by source records.
 - b. Confirmation that the number of reported ND AFPs delivered to (e.g., ND AFP applied to the customer account or refunded to bank account) or redeemed (e.g., prepayment voucher cashed) by customers has been accurately and is supported by source records.
 - c. Confirmation that the number of exceptions reported has been accurately and is supported by source records.

- d. Any recommendations arising from the internal assurance process, including action owners and intended timescales for completion.
- 7.19 The name, designation and contact details of the individual authorising the internal audit report should be clearly outlined.
- 7.20 The submission of the internal audit report will be via email to ndafp@beis.gov.uk alongside the requested reconciliation and compliance report, by 24th March 2023.
- 7.21 On receipt of the internal assurance declaration as part of the reconciliation and compliance report, BEIS will complete a review of the information provided. This will inform the compliance assessment. As part of the assessment BEIS may raise questions or concerns with the supplier and may seek clarity on the content and assurances provided by the author of the internal audit report.

Post payment assurance

- 7.22 Post payment assurance will be carried out by BEIS to ensure the effective management of public money. BEIS will undertake detailed assurance checks on a subset of payments delivered to customers by non-domestic electricity suppliers to assess whether appropriate and robust processes were in place to complete the minimum assurance for operating the ND AFP.
- 7.23 Suppliers are required to participate in a post payment sample-based assurance process, the purpose of which is to provide assurance that all ND AFP payments have been delivered in line with the eligibility conditions for the scheme.
- 7.24 Appropriate evidence must be retained to evidence that all ND AFP payments met all relevant criteria at the point of award.
- 7.25 For ND AFP payments delivered, at a minimum suppliers must be able to evidence:
 - a. The meter was an eligible meter.
 - b. The customer eligibility on the qualifying date.
 - c. The value of the £150 ND AFP payments delivered.
 - d. The date of the £150 ND AFP payments delivered.
 - e. The ND AFP payment was communicated with the customer just before or at the time of delivery as a payment funded by HM Government.

- f. The date the ND AFP payment was redeemed where a cheque was issued.
- 7.26 Where a payment was not delivered to an eligible customer the supplier must be able to evidence:
- a. The case falls within one of the categories of exception case set out in the Direction.
 - b. Reasonable steps were taken to provide the ND AFP payment before classing the case as an exception (see Annex E).
- 7.27 Personal information such as customer name and address should be redacted, but the MPRN must be clearly visible.
- 7.28 Suppliers will have 30 days to submit the evidence requested to BEIS.
- 7.29 BEIS will review the evidence presented and confirm satisfactory receipt to suppliers. Where suppliers are unable to provide evidence required to support that ND AFP payments have been delivered then recovery enforcement action may be instigated by BEIS and/or UREGNI.

Audit Programme

- 7.30 BEIS will appoint independent auditors to deliver an external audit programme and obtain audit assurances.
- 7.31 Audit information will be shared between UREGNI and BEIS to assist both parties in undertaking their functions. The purpose of the audit is to:
- a. Ensure that the information provided, including the end of scheme report (see from paragraph 7.1), is correct.
 - b. Provide BEIS with assurance over the number and value of payments provided and delivered.
 - c. Ascertain whether the total value of advances that suppliers have claimed are reconciled against those payments delivered and ensure as far as reasonably practicable that payment figures are reported correctly.
 - d. Evidence will be provided to UREGNI if any enforcement activity needs to be carried out.
 - e. The auditor will be expected to complete a report for each supplier. The audit will include:

- Verifying the accuracy of data submissions to BEIS in line with the Direction and Guidance – test a sample of the data to ensure that information submitted to BEIS for compliance and for progress reporting is accurate.
 - Securing assurance of compliance with this Guidance and with any processes and procedure that BEIS may have reviewed with the supplier.
 - Identifying any suspected fraud, either on the part of the supplier or those parties with whom they have a contract for the delivery of the ND AFP payment in respect of the payments and reimbursement process; and
 - Identifying any irregular payments due to error or non-compliance, and detect departures from good practice that have resulted, or that may result, in suppliers requesting reimbursement for the incorrect amount.
- f. Review the end of scheme report.
- 7.32 The above list is indicative, and suppliers may be subject to audit to obtain assurances other than those listed above.
- 7.33 The evidence of the external audit will be used, alongside the assurance and compliance assessment processes, to determine if a supplier has met its obligations.

End of scheme Compliance Assessment

- 7.34 It is the responsibility of the supplier to retain sufficient management information on administering the ND AFP to be effectively audited.
- 7.35 Suppliers must make sufficient information, records and personnel available, at the time required, to enable the external auditor to effectively undertake the audit, co-operating with the auditor as required.
- 7.36 Suppliers refusing to participate or co-operate with the external audit programme may be considered non-compliant and the case may be referred to UREGNI for potential enforcement action.
- 7.37 It is intended the audit programme will take place in May 2023. Suppliers will be provided with notification in advance of any site visit. The external auditor will seek a mutually agreeable date.

8 Reporting

End of scheme report

- 8.1 The end of scheme report will compile the information and data submitted for the duration of the scheme. It will give an up-to-date view of the position of the supplier at the end of the scheme.
- 8.2 BEIS will use this report to reconcile all payments made under the scheme. Final reconciliation will allow reimbursement to suppliers of any balance due or repayment of undispersed balance to BEIS.
- 8.3 The initial end of scheme report must be submitted by 24th March 2023 and the final end of scheme report must be submitted after the final date but on or by the 31st July 2023. Suppliers are required to submit the final report to BEIS and may be shared with UREGNI to support their enforcement role.
- 8.4 To complete the end of scheme report suppliers must also provide the number of outstanding customers and the number and category of exception cases as of 30th June 2023.
- 8.5 The end of scheme report must be signed by the Responsible Person and internally assured by the Senior Compliance Officer.
- 8.6 The end of scheme report will be subject to independent external audit.

Other reporting

- 8.7 Suppliers may be asked to provide information; participate in surveys or other opinion gathering; and engage in discussions to evaluate the outcomes of the scheme and/or assist BEIS in evaluating the scheme more generally.
- 8.8 Suppliers may be asked to provide information to BEIS and/or UREGNI to answer questions (including Parliamentary Questions and ministerial correspondence) on topics including, but not solely limited to, the operation of the scheme, and information that BEIS may require to support the development and monitoring of government policy.

Annexes

Annex A: Supplier Information

Responsible Person:	
Supplier contact with overall responsibility for the administration of the scheme	
Name	
Position	
Email	
Telephone	
Address	
Primary Contact:	
Primary contact for day-to-day administration of the scheme – will receive all ND AFP delivery correspondence	
Name	
Position	
Email	
Telephone	
Address	
Secondary Contact:	
Secondary contact for day-to-day administration of the scheme – will receive all ND AFP delivery correspondence	
Name	
Position	
Email	
Telephone	

Address	
Financial director (or equivalent):	
Responsible for signing and submitting monthly solvency statement	
Name	
Position	
Email	
Telephone	
Address	
Senior compliance officer:	
Responsible for compiling and certifying the internal assurance declaration. Must not be under the direction of the responsible person	
Name	
Position	
Email	
Telephone	
Address	

Supplier contacts requiring access to Data Management System (DMS)		
For submission of reporting (up to 5 contacts)		
Name	Position	Email address

Additional information	
UREGNI supplier licence number	
Companies House number	
VAT number	

WITHDRAWN

Annex B – AP1a form

EBRSNI_NDAFP

AP1a

Oracle SUPPLIER INFORMATION FORM

This form should be used for all organisations

IF FACTOR IS USED PLEASE ATTACH DETAILS SEPERATELY

1. Name of Company

--

2. Company Registration Number

--

3. VAT Registration Number (if applicable)

--

4. Company Address

First Line

--

City

--

County

--

Postcode

--

email

--

PO e-mail

--

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Annex C: Solvency statement and bank account statement templates

Non-Domestic Alternative Fuel Payment Solvency statement – required of suppliers on or by 8th February 2023

From: [the relevant domestic electricity supplier]

To: The Secretary of State for Business, Energy and Industrial Strategy

Dated []

Dear Sir

[name of the relevant domestic electricity supplier] (the “Company”)

I acknowledge that the provision of this certificate is a requirement of the Non-Domestic Alternative Fuel Payment Direction made by The Secretary of State for Business, Energy and Industrial Strategy on [publishing date] 2022 (the “Direction”) and that the Secretary of State for Business, Energy and Industrial Strategy and his officials will rely on this certificate in providing Non-Domestic Alternative Fuel Payments to the Company.

I am the [finance director/other director] of the Company and hereby declare that no insolvency event (as defined in the Direction) has occurred with respect to the Company and that having made reasonable enquiries I am not aware of any circumstances that could reasonably be expected to give rise to an insolvency event during the calendar month in which this declaration is given or in the immediately following calendar month.

This certificate and any non-contractual obligations arising out of or in connection with it are governed by English law.

Yours faithfully

[name of [finance director/other director]]

Finance Director/[other Director]

For and on behalf of [name of the domestic electricity supplier]

Annex D: Supplier letter template to customers

Dear customer,

Re: Non-Domestic Alternative Fuel Payment £150 added to your account

You have been provided with a £150 payment to your non-domestic electricity account through HM Government's initiative, the Non-Domestic Alternative Fuel Payment.

This is being provided to all non-domestic customers in Northern Ireland. It is intended to give support to non-domestic customers with their heating costs during the winter 2022/23 following the increase in energy bills.

This one-off fixed payment of £150 has been, added to your non-domestic electricity account automatically without any need to apply. The funds have been provided by HM Government and we as your electricity supplier are responsible for providing your account with the payment amount of £150. It has been added to your account on [date].

This payment is separate to other schemes funded by government including the Energy Bill Relief Scheme, Energy Bill Support Scheme and the Domestic Alternative Fuel Payment, which have different qualifying criteria.

This is regulated by UREGNI, and any issues with underpayment from suppliers will be subject to enforcement action.

If you are an intermediary, such as a landlord, you will be required to pass support through to end users, such as tenants, in a just and reasonable way.

A top-up payment in addition to the £150 will be available for large users of heating oil (kerosene) in Great Britain and Northern Ireland to take account of their higher usage. These top-up payments will require an application and will be banded based on level of usage. The highest users will receive a bespoke payment corresponding to the actual quantity of heating oil used.

If you have any questions, please get in touch with us directly or review the online guidance at <https://www.gov.uk/government/publications/non-domestic-alternative-fuel-payment-scheme-northern-ireland-guidance-for-electricity-suppliers> .

Kind regards,

Annex E: Exception cases

Category	Definition	Number
No forwarding address or contact details	A customer is no longer operating at that property and has closed their account after a monthly qualifying date and before the ND AFP was provided. The customer has left no forwarding address.	
Supplier has no name of eligible customer	Where a premises was captured on the qualification date though named details of the account holder were not available.	
Vacant property on qualifying date	Where a premises was captured as having a non-domestic electricity supply on the qualification date, but further investigation revealed that the property was empty and no eligible customer could be established.	
Disconnected premises	Where a non-domestic premises was captured on the qualifying date but further investigation revealed that there was no property or eligible customer (e.g. house demolished, destroyed by fire, empty for renovation, etc).	
Change of tenancy	A customer account was captured on the qualifying date on a supplier's customer database, but it transpires a different customer was actually in the property on the monthly qualifying date.	
Erroneous transfers	Where an eligible customer was erroneously transferred into the electricity supplier on the qualifying date but was returned to another supplier shortly thereafter. The electricity supplier could not establish contact details for this customer or the customer did not respond to contact detail information requests.	

Annex F: Control Points

Control points for Direct Debit customers

Process Step	Control Points Description
Suppliers to reduce customers monthly Direct Debit by the ND AFP value.	Supplier will report how many Direct Debit customers they have provided the ND AFP to via a reduction in their monthly Direct Debit payment. Evidence of Direct Debit collected in February/ March 2023.
Suppliers to issue refund to eligible customers' registered bank account	Supplier will report how many Direct Debit customers they have provided the ND AFP to via a refund to their registered bank account. Bank and transfer statements will serve as evidence.
Customers to receive credit balance adjustment if their monthly Direct Debit value is less than the ND AFP value.	Where applicable (i.e., where the ND AFP exceeds that of the customer's Direct Debit payment), a customer account is deemed to have been successfully 'delivered' to if the supplier is also able to confirm the customer has also received a credit balance adjustment, equivalent to the delta between the ND AFP value and Direct Debit amount. Evidence in the form of customer account statement.
Suppliers to provide a payment to the customer or credit to the customer's energy account equal to the AFP value.	Supplier will report how many Direct Debit customers they have provided the ND AFP to via a payment to their registered bank account or credit to their energy account. Customer account statement or bank and transfer statements will serve as evidence.
Suppliers to specify on a customer's next Bill or statement of account or otherwise that an ND AFP has been	A supplier will be able to report a fully 'delivered' ND AFP for a customer

provided that the ND AFP is a payment funded by HM Government.	account if they have communicated delivery of the ND AFP to the customer.
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Control points for credit customers

Process Step	Control Points Description
Suppliers to apply ND AFP value, as a credit, to their eligible customer's account.	Suppliers will report how many credit customer accounts have successfully provided with the ND AFP. Customer account bill or other statement, indicating a positive account credit adjustment will serve as evidence of this step.
Suppliers to specify on a customer's next Bill or statement of account or otherwise that an ND AFP has been provided that the ND AFP is a payment funded by HM Government.	A supplier will be able to report a fully 'delivered' ND AFP for a customer account if they have communicated delivery of the ND AFP to the customer.

Control points for pre-payment customers

Process Step	Control Points Description
Suppliers to send ND AFP as a bank transfer or cheque to eligible customers.	Supplier will report how many of their eligible traditional pre-payment customers have been sent an ND AFP by cheque.
Eligible customers to cash out with the bank transfer or cheque provided by their supplier.	Suppliers to report how many ND AFP cheques have been provided to their customers.

Annex G: Reporting calendar

Date	Report/Action	Purpose	Direction
8 th February 2023	Supplier information submitted	BEIS: scheme administration	Para 7(a), and 11(b)Guidance
8 th February 2023	Solvency Statement, supplier bank account details (AP1A form) submitted	BEIS: secure release of payment	Para 7(a) Para 12(c) Guidance AP1A form
8 th February 2023	Signed Deed returned	BEIS: secure release of scheme payment	Para 12(d)
10 th March 2023	Supplier information notification	BEIS: scheme administration	Para 7 (b)
10 th March 2023	Payments to be made to eligible customers by 23:59 hours	Suppliers must have made payments	Para 2, definition of 'cut-off date'
24 th March 2023	Initial end of scheme report	BEIS: Reconciliation of payment BEIS: Check internal assurance has occurred	'Para 11(a)
30 th June 2023	Final payments made to eligible customers	BEIS: Reconciliation of payment	Para 2, definition of 'final date'
June 2023	Assurance sample issued	BEIS: scheme assurance	NA

31st July 2023	Final end of scheme report	BEIS: End of scheme reconciliation BEIS: End of scheme compliance assessment	Para 11(a)
August – September 2023	Assessment of initial report and end of scheme report	BEIS: Determining whether the supplier was compliant with ND AFP obligations	NA

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