







# Micro-generation settlement

Consultation Paper – 19 March 2021









## **About the Utility Regulator**

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive leads a management team of directors representing each of the key functional areas in the organisation: Corporate Affairs, Markets and Networks. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.



## (2)

## Our mission

To protect the short- and long-term interests of consumers of electricity, gas and water.

## Our vision

To ensure value and sustainability in energy and water.



## Our values

- Be a best practice regulator: transparent, consistent, proportionate, accountable and targeted.
- Be professional listening, explaining and acting with integrity.
- Be a collaborative, co-operative and learning team.
- Be motivated and empowered to make a difference.









## **Abstract**

In line with the Market Registration Code (MRC) Change Control Procedure the Utility Regulator has been asked by the Central Design Authority (CDA) to consider two mutually exclusive options for the methodology for ascribing the generated units to micro-generators for the electricity they generate and export to the Northern Ireland electricity distribution system.

### **Audience**

This document is likely to be of interest to regulated companies in the energy industry, suppliers, government, industry groups, consumer bodies, environmental groups, those with an interest in the energy industry and anyone with installed small scale generation.

## **Consumer impact**

Changes to market systems may affect how Suppliers have their export units taken into account in their wholesale settlement values.

All micro-generators are free to choose not to accept the regulated offering based on their own commercial considerations. Where a generator chooses not to enter into the regulated contract, the amount that they are offered for electricity and associated benefits will depend on the contract that that generator has entered into.

If the deeming value is incorrect then suppliers could potentially be overpaying for these exported units in the wholesale market and in turn these costs could be passed on to the consumer.









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## **Executive Summary**

As part of its role in regulating Northern Ireland's electricity industry, the Utility Regulator's functions involve the licensing of electricity suppliers, generators and transmission and distribution companies.

This public consultation focuses on proposed changes to the existing arrangements for the methodology for ascribing the generated units to micro-generators for the electricity they generate and export to the Northern Ireland electricity distribution system.

In line with the Market Registration Code (MRC) Change Control Procedure the Utility Regulator has been asked by the Central Design Authority (CDA) to consider two opposing changes to the existing arrangements.

When considering micro-generation this consultation identifies the challenges that need to be addressed if an equitable approach is to be achieved to ensuring those who generate their own renewable electricity, for example from solar panels on their roofs, are assigned the correct level of units when they sell units that are not consumed on the premises into the grid.

## 1.Introduction

#### **Background**

- 1.1. A micro-generator is small-scale plant and equipment used to generate electricity, such as solar panels on the roof of a domestic dwelling. The electricity generated can be used on site with any electricity not used on site exported onto the Northern Ireland electricity distribution system. Micro-generators are able to sell this electricity either directly to a supplier or by using the services of an agent.
- 1.2. In 2015 and in accordance with the procedures set out in the Market Registration Code¹ the Utility Regulator approved a proposed change to the Code which meant that each micro-generator was 'deemed' to have exported a percentage of the installed capacity (times the load-factor) and is known as a 'Deemed Solution'. This was based on the installed capacity that it had registered with Ofgem for the purposes of receiving Renewables Obligations Certificates.
- 1.3. Based on the generation type a half hour settlement profile<sup>2</sup> is applied to calculate the expected amount of generation per year. A figure of 45% is then applied as this is what, on average, is 'deemed' to be exported to the grid from a premises with a micro-generator. This 45% figure was calculated using the average of a sample of export meter readings provided, at that time, prior to the introduction of the Deemed Solution.
- 1.4. A micro-generator is then able to contract and receive a payment for their exported units either directly with a supplier or through an agent based on this deemed figure.
- 1.5. This short-term interim Deemed Solution was implemented on 31 August 2015.
- 1.6. It is a commercial decision for the supplier whether to buy the exported electricity and seek settlement in the wholesale market. However, Power NI has an obligation to offer terms to micro-generators where asked.
- 1.7. The Utility Regulator has received two Change Requests from the CDA requesting approval for changes to the market systems.
- 1.8. The purpose of this consultation is to seek views on the two Change Requests to aid the Utility Regulator in its consideration of whether or not to approve either of

<sup>1</sup> https://www.uregni.gov.uk/sites/uregni.gov.uk/files/media-files/20120521\_MRC\_Final\_2.pdf

<sup>&</sup>lt;sup>2</sup> A load profile in simple terms can be described as an estimate of how much electricity a generator produces over the course of a year. A half-hourly Load profile is produced for each generator type (wind, solar etc.) and can be applied where half-hourly metering is not available to record actual output.

those requests.

#### **Market Registration Code**

- 1.9. As part of its role in regulating Northern Ireland's electricity industry, the Utility Regulator's functions involve the licensing<sup>3</sup> of electricity suppliers, generators, and transmission and distribution companies.
- 1.10. The Market Registration Code (MRC)<sup>4</sup> is published and maintained by NIE Networks under Condition 29 of its electricity distribution licence. The purpose of the MRC is, in simple terms, to govern the arrangements between electricity suppliers and NIE Networks as a distributor. It sets out the provisions which facilitate supply by a licensed supplier to premises connected to the NIE Networks distribution system. Electricity suppliers are required to sign up to and comply with the MRC under Standard Condition 4 of their supply licences.
- 1.11. The Utility Regulator is entitled to participate in all CDA Board activities in the capacity of an observer.
- 1.12. The procedure for modifications to the MRC is set out in Schedule 5. A participant to the MRC can request a modification at any time. These are known as Discussion Requests or DRs and assigned a number. Such proposals are considered by the Central Design Authority which is a body set up under the MRC and made up of representatives from NIE Networks and suppliers who are parties to the MRC.
- 1.13. Where the CDA Board or the Utility Regulator (as the case may be) decides that a Discussion Request merits further consideration, it will be reclassified as a Change Request.
- 1.14. The Central Design Authority will then prepare and circulate to participants in the Code an Impact Assessment Form requesting details of the effect of the Change Request on the Participant's business from a technical, business, financial and operational perspective.
- 1.15. Once the Impact Assessment Report is completed, the CDA Board will consider and discuss the Change Request and make one of the following decisions in relation to it:
  - a) Decide by consensus to defer the Change Request for consideration at its next meeting.
  - b) Decide by consensus to request the CDA to procure further

<sup>&</sup>lt;sup>3</sup> <u>https://www.uregni.gov.uk/electricity-licences</u>

<sup>&</sup>lt;sup>4</sup> https://www.uregni.gov.uk/sites/uregni.gov.uk/files/media-files/20120521\_MRC\_Final\_2.pdf

- consideration in relation to the Change Request.
- c) Decide by consensus that the Change Request should be implemented (either as proposed or in a modified form) and request the Central Design Authority to prepare a Change Report and request approval from the Utility Regulator.
- d) Decide by consensus that the Change Request should not be implemented.
- e) Where it is unable to reach consensus, refer the Change Request to the Utility Regulator for a decision.
- f) By consensus, make such other decision as the CDA Board considers appropriate in relation to the Change Request.
- 1.16. Where the CDA Board or the Utility Regulator (as the case may be) decides that a Change Request should be implemented (either as proposed or in a modified form), the CDA will prepare a Change Report for the Change Request setting out:
  - (a) the details of the Change Request;
  - (b) the steps to be taken in order to implement the Change Request, and who is responsible for taking each of those steps;
  - (c) the timetable for implementation, which shall be consistent with the schedule set out in the Harmonised Retail Market Development Plan; and
  - (d) the estimated costs of implementation.
- 1.17. The CDA will then submit the Change Report to the Utility Regulator with a request for approval or otherwise to proceed with the relevant Change Request.

#### Connection to the NI electricity distribution system

- 1.18. Under Regulation 23 of the Electricity Safety, Quality and Continuity Regulations (Northern Ireland) 2012 when a micro-generator is first installed, it must be registered with NIE Networks before or at the time that it is commissioned.<sup>5</sup>
- 1.19. To connect to the distribution system installers of Micro-generators up to 16A per phase must meet all of the requirements set out in the Engineering Recommendation EREC G98/NI. This is known as a G98/NI connection

<sup>&</sup>lt;sup>5</sup> https://www.nienetworks.co.uk/connections/generation-connections/micro-scale

(previously referred to as a G83/NI connection).

- 1.20. The G98/NI Stage 1 process is for single installations within a close geographical area. The Installer shall fit the microgeneration at the customer's site and commission the installation. The installer is then required to register generator connection and submit the completed commissioning documentation to NIE Networks. NIE Networks then arranges to have an import/export meter fitted at the site.
- 1.21. A G98/NI Stage 2 application is required for multiple installations in close proximity. The Installer must submit an application for all proposed microgeneration connections at sites in a close geographic region (sites where more than one SSEG installation planned by the same organisation are within 500m of each other which are installed within 28 days of each other).
- 1.22. NIE Networks will then carry out a Network Connection Study to assess the potential impact of the connections on the network. Once this assessment is complete NIE Networks will advise the installer of the outcome of the G98/NI Stage 2 application, which will be one of three options:
  - NIE Networks agree in principle that the connection can proceed;
  - NIE Networks refuse permission to connect as there are fault level issues on the network; and
  - NIE Networks inform the Installer that reinforcement works are required before the connection can proceed. This will include a cost estimate for the works.
- 1.23. If reinforcement works are required, the Installer must either formally request a quotation from NIE Networks for the works or withdraw the application if they do not wish to proceed. Only once the required network reinforcement works (if reinforcement works required) are completed can the Installer fit the microgeneration at the customer's site and commission the installation. The installer is then required to register generator connection and submit the completed commissioning documentation to NIE Networks. NIE Networks then arranges to have an import/export meter fitted at the site.
- 1.24. Due to demand, there were previously some issues with delays in export meters being installed and indeed this was part of the reason for the adoption of the interim Deemed Solution.
- 1.25. Under Condition 27 of NIE Networks' Distribution Licence<sup>6</sup> NIE Networks is

<sup>&</sup>lt;sup>6</sup> https://www.uregni.gov.uk/sites/uregni/files/media-files/NIE%20Distribution%20Licence%20-%20effective%2018%2001%202020.pdf

- required to prepare and at all times have in force, implement and comply with, a Distribution Code.<sup>7</sup>
- 1.26. This Distribution Code covers all material technical aspects relating to connections to and the operation and use of NIE Networks' Distribution System.
- 1.27. The Distribution Code is designed so as to:
  - permit the development, maintenance and operation of an efficient, coordinated and economical system for the distribution of electricity; and
  - neither prevent nor restrict competition in the generation and supply of electricity in Northern Ireland.
- 1.28. The Distribution Code also mandates the registration and metering of such generation. If such generation exists without the requisite metering then it is in breach of the Distribution Code.

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<sup>&</sup>lt;sup>7</sup> https://www.nienetworks.co.uk/distribution-code

## 2. Change Requests

- 2.1. In line with the MRC Change Control Procedure, Discussion Requests DR1202 and DR1203 were submitted to the CDA in advance of the CDA meetings on 6 November 2019 and 16 January 2020 respectively. DR1202 was raised by Power NI and DR1203 was raised by Budget Energy.
- 2.2. DR1202 proposes moving away from the Deemed Solution to a system where actual export meter reads are provided by the micro-generator. DR1203 proposes to retain the Deemed Solution, review the deemed profile value of 45% and align the export settlement calendar with the annual NIRO<sup>8</sup> Compliance Periods.
- 2.3. Following the CDA Board meeting on 16 January 2020 it was agreed that Impact assessments were to be completed and would be discussed at the next CDA Board meeting.

#### **DR1202**

- 2.4. At the 4 March 2020 CDA Board meeting, the CDA considered the Impact Assessments received from Suppliers in relation to DR1202 - Micro Generation Sites Process.
- 2.5. The discussion held at that meeting is summarised below.

#### Background

- 2.6. Before the interim solution was implemented there was no active competition between suppliers for off-take and Power NI, as the only supplier with a licence condition is mandated with the purchase of micro generation.
- 2.7. The Deemed Solution was implemented as a temporary solution for suppliers in the wholesale market. It was acknowledged by CDA that was an imperfect solution as it was not based upon actual generation verified by meter readings.

#### Proposed Process

2.8. The new proposed process would require suppliers to collect and submit actual meter reads to NIE Networks on an annual basis to enable actual generation exported onto the grid to be profiled and ascribed to a supplier through the existing market processes. Suppliers would submit these actual meter reads to NIE Networks on the same timetable of existing submissions required for the Deemed Solution.

<sup>8</sup> https://www.uregni.gov.uk/sustainability

#### **Impact Assessments**

2.9. The CDA Board Meeting minutes from 4 March 2020 records that three impact assessments were received for DR 1202.

Budget Energy

- 2.10. Budget Energy was partially supportive of DR1202 as it was the re-instatement of a previous Discussion Request (DR1186<sup>9</sup>) that required an MPRN or ROC Accredited ID to be submitted to NIE Networks per site. This allows a validation process to take place to show that the micro-generator was properly connected and commissioned as per NIE Networks' requirements.
- 2.11. However, Budget Energy did not support the requirement for meter reads in DR1186 for the reasons summarised below:
  - Attaining meter reads is no perfect solution. It creates administration for other suppliers to facilitate these reads.
  - The Deemed Solution is active and in operation in other markets and it works well in NI.
  - Submission of meter reads provides further administrative pressure for Suppliers. This could prove detrimental to any other suppliers who may wish to offer this tariff in the future.
  - Uncertainty around the number of micro-generators and their connection status.
  - Confusing customer journey with three sets of reads to be provided annually.

Click Energy

2.12. Click energy stated its preference was to maintain the Deemed Solution in its current format. No reasoning was given as to this preference.

Power NI

2.13. Power NI argued that payments made for generation export should be based on meter reads and this is the approach that Power NI takes with its microgeneration customers.

Non-consensus at CDA Board

2.14. At 29 April 2020 CDA Board Meeting, it was advised that due to non-consensus

<sup>&</sup>lt;sup>9</sup> DR1186 was a previous change Request submitted to CDA for the implementation of a meter read solution.

of the Board at the previous meeting, a Change Request Report would be prepared by CDA for issue to Utility Regulator requesting a decision to proceed or not to proceed with the Change Request.

#### **DR1203**

- 2.15. At 4 March 2020 CDA Board meeting, CDA outlined the Impact Assessments received from Suppliers in relation to DR1203 - Microgeneration Deemed Profile Value.
- 2.16. The discussion held at that meeting is summarised below.

#### Background

- 2.17. The introduction of DR1143<sup>10</sup> provided the basis for wholesale settlement of export from micro-generators in NI through the use of a deemed profile value. It was understood that this deemed profile value of 45% (currently assumed to be exported to the grid) of the declared net capacity would be reviewed on an ongoing basis.
- 2.18. This solution provided a route to market settlement up to the deemed profile value for any suppliers wishing to offer micro-generation agency services to their customer base.
- 2.19. It was expected that the deemed export kWhs claimed for by suppliers under the solution would be settled in their entirety using an equivalent Half Hour Load profile.

#### Proposed Process

- 2.20. The proposed process to enhance DR1143 would be to align the export settlement calendar with the annual NIRO Compliance Periods. The deemed export settlement is processed from Oct – Sep and each NIRO compliance period runs April – March.
- 2.21. Half Hour Load profiles are created using the period April March which are concurrent with the NIRO Contract Periods. Under the current solution these are altered to reflect the NI export settlement period of Oct Sep. This creates the amalgamation of two profiles from different years which when combined may create a difference in kWh's claimed and subsequently settled by a supplier in the wholesale market.
- 2.22. The result of moving the settlement period to April March would ensure the deemed export claimed directly replicates the deemed export settled to suppliers.

<sup>&</sup>lt;sup>10</sup> DR1143 was the Discussion Request at CDA that ultimately led to the introduction of the 'Deemed Solution'

2.23. Furthermore, the deemed profile value of 45% of the declared net capacity has not been reviewed since the introduction of DR1143; it is now proposed that this value is reviewed.

#### Impact Assessments

2.24. The CDA Board Meeting Minutes from 04 March 2020 records that 2 impact assessments were received for DR 1203.

Click Energy

2.25. Click Energy's preference was to maintain the Deemed Solution in its current format (including process timetable). However, Click Energy had no objection to a review of the deemed export profile.

Power NI

- 2.26. Power NI highlighted several issues with the reasoning and justification for DR1203. The DR is based on the justification that the April-March period aligns with the NIRO compliance period and that the annual settlement profiles are based upon NIRO. Power NI did not agree with the linkage between NIRO and export readings. NIRO is based on generation meter readings not export meter readings. These are entirely separate meters and readings. NIRO does not produce a profile which is applied to export. NIE Networks currently use an export profile based upon an Elexon GB profile adjusted for Northern Ireland. This has been the long established process which is used to determine all profiles used in the settlement of the Northern Ireland market. Power NI did not agree with the comment in relation to settlement periods making a difference in kWh's claimed and subsequently settled. Power NI did not believe it provided justification for the change proposed by DR1203.
- 2.27. It stated that should the Utility Regulator wish to change the "export year" this would have a significant impact on Power NI, its customers and require a licence change to give effect to moving the "export tariff year" away from the "electricity tariff year".

#### Non-consensus at CDA Board

2.28. At the 29 April 2020 CDA Board Meeting, it was advised that due to non-consensus of the Board at the previous meeting, a Change Request Report would be prepared by CDA for issue to Utility Regulator requesting a decision to proceed or not to proceed with the Change Request.

#### Deemed Solution verses a metered solution

2.29. Both Change Requests are mutually exclusive of one another and only one Change Report can be taken forward. One is an update of the existing Deemed

Solution whereas the other is a complete move away from the Deemed Solution to the provision of an actual export meter read arrangement.

#### **Benefits of the Deemed Solution**

- 2.30. Other than registering with an electricity supplier or agent the owner of a microgenerator does not have to do anything to receive an export payment.
- 2.31. Micro-generators with inaccessible or difficult to read export meters can still receive an export payment. The procedure of having to collect, collate, process and submit export meter reads can have a cost for a supplier which it will need to recoup.

#### **Issues with the Deemed Solution**

- 2.32. Some micro-generators would be under paid if more than 45% of the output is being export to the network.
- 2.33. There is an incentive, contrary to what is desirable from the perspective of energy efficiency, to use all of the electricity generated because the microgenerator is still paid for electricity deemed to have been exported.
- 2.34. Even if all the generated units from a micro-generator are used on site, the micro-generator is out of service or running below capacity it is still assumed that 45% of the expected output is exported and micro-generators are paid on this assumption.
- 2.35. The figure of 45% itself might not remain a valid average across all microgenerators. If the deeming value is incorrect then suppliers could potentially be overpaying for these exported units in the wholesale market and in turn these costs could be passed on to the consumer.
- 2.36. It should also be noted that a consultation<sup>11</sup> by the Department of the Environment, Climate and Communications in the Republic of Ireland on 'Microgeneration Support Scheme in Ireland' has set a 30% limit on the level of export onto the network was chosen to maximise self-consumption savings. The consultation states that this 30% level is the optimal level for prosumers to pay back their installation costs quickly.

#### Benefits of a metered solution

2.37. While it would appear that having to provide a meter reading could be onerous the Utility Regulator is aware of at least one supply company<sup>12</sup> that currently requires the submission of an export meter reading along with a date stamped

<sup>&</sup>lt;sup>11</sup> <a href="https://www.gov.ie/en/consultation/0ada2-public-consultation-on-a-micro-generation-support-scheme-mss-in-ireland/">https://www.gov.ie/en/consultation/0ada2-public-consultation-on-a-micro-generation-support-scheme-mss-in-ireland/</a>

<sup>12</sup> https://powerni.co.uk/products--services/renewablegeneration/microgeneration/

- picture to ensure payments are made.
- 2.38. There is uncertainty around the volumes and connection status of some sites as raised by Budget Energy as part of its Impact Assessment.
- 2.39. Providing an export meter reading ensures the validation of a micro-generator in-line with the required G98/NI connection process.
- 2.40. The cost of suppliers buying surplus electricity is ultimately borne by Northern Ireland consumers. The Utility Regulator has a duty to protect the short and long-term interests of electricity, gas, water and sewerage consumers with regard to price. The Utility Regulator needs therefore to ensure that consumers do not pay for generation from (i) a generator connected incorrectly that has not followed the G98/NI connection process described above, or (ii) for electricity which was not in fact ever generated.
- 2.41. Electricity units consumed from the distribution network are more expensive than the cost of exported units. Having the electricity units generated by a microgenerator used on site and offset against consumption can reduce electricity bills. Ensuring micro-generators only receive payment for exported units can encourage this practice.
- 2.42. Details of exported units can be used by NIE Networks to accurately determine distribution system capacity and allow for the planning and development (including reinforcement and extension) of the Distribution System.
- 2.43. Potential support from future energy mechanisms developed by the Department for the Economy in their new Energy Strategy may be better and more fairly underpinned by an actual meter reading solution rather than a Deemed Solution.

#### Issues with a metered solution

- 2.44. There are some private companies that currently own PV systems under the "rent-a-roof" model. In this model, the owner of the PV system is not necessarily the owner of the property and simply rents access to airspace above the roof. The homeowner in this model generally receives free electricity from the PV system. The owner of the PV system may not have access to the NIE Networks' export meter. There is also no incentive for the homeowner to read the NIE Networks' export meter as the export value would be considered to belong to the owner of the PV system.
- 2.45. For this reason it may be more difficult for these private companies to obtain an export meter reading from multiple systems, often at locations where they cannot physically access the NIE Networks' meter and ultimately get paid for exported units.
- 2.46. Providing an export meter reading would need to take place before the

settlement deadline and the ability to provide a reading could lead to missed export payments for some micro-generation owners. It should be noted that a missed export reading could be picked up next time round and therefore a missed payment would be only temporary.

2.47. For micro-generators with inaccessible or difficult to read export meters an export meter reading will still have to be provided. This may prove difficult for some owners of micro-generation however NIE Networks can relocate a meter to a more accessible location when requested to do so.

## 3. Next Steps

3.1. We invite stakeholders to provide their views on the following questions:

#### General

• What is the nature of your company's business?

#### DR1202

- Do you agree with proposed changes to move to an actual export meter read arrangement as set out in DR1202? Please provide rationale.
- Are there any other elements of an export meter read arrangement that you feel should be made? Please provide rationale. What timescales might be applicable in each case?
- What do you see as the main benefits of the proposed changes to an export meter read arrangement: A) to the micro-generator? B) to your company?
- What potential problems could arise from not implementing the proposed changes to an export meter read arrangement?
- Do you have any other comments in relation to the proposal?

#### **DR1203**

- Do you agree with proposed changes to the Deemed Solution as set out in DR1203? Please provide rationale.
- Are there any other elements of the Deemed Solution that you feel should be made? Please provide rationale. What timescales might be applicable in each case?
- What is your view on how successful the Deemed Solution has been since it was introduced in NI in 2015? Is there anything that could have been improved?
- What do you see as the main benefits of the proposed changes to the Deemed Solution: A) to the micro-generator? B) to your company?
- Do you consider that the deemed profile value of 45% needs reviewed. Can you provide any evidence to support this figure or assist in its review?
- What potential problems could arise from not implementing the proposed changes to the Deemed Solution?
- Do you have any other comments in relation to the proposal?

#### **Consultation Responses**

3.2. The deadline for responses to this consultation is 5pm on 19/05/2021. Responses should be sent to:

Albert Shaw		
Utility Regulator		
Queens House		
14 Queen Street		
Belfast		
BT1 6ED		
Albert.Shaw@uregni.gov.uk		

- 3.3. The Utility Regulator's preference would be for responses to be submitted by email to the above email addresses. We welcome feedback on any aspect of this change process or associated documents. Individual respondents may ask for their responses (in whole or in part) not to be published, or that their identity should be withheld from public disclosure.
- 3.4. Where either of these is the case, the Utility Regulator will also ask respondents to supply the redacted version of the response that can be published.
- 3.5. The Utility Regulator will also accept oral representations as a response to this consultation. Oral representations will be carried out remotely by video conference using WebEx or Zoom. All oral representations will be recorded so that they can be fully documented and views can be accurately represented. Should you wish to respond in this way, please use the email address above to contact the Utility Regulator to arrange a video conference. Please note the Utility Regulator will not be giving any further detail or opinion on this paper during any oral representation.
- 3.6. As a public body and non-ministerial government department, the Utility Regulator is required to comply with the Freedom of Information Act (FOIA). The effect of FOIA may be that certain recorded information contained in consultation responses is required to be put into the public domain.
- 3.7. Hence it is now possible that all responses made to consultations will be discoverable under FOIA, even if respondents ask us to treat responses as confidential. It is therefore important that respondents take account of this and in particular, if asking the Utility Regulator to treat responses as confidential, respondents should specify why they consider the information in question should be treated as such.

3.8. This paper is available in alternative formats such as audio, Braille etc. If an alternative format is required, please contact us and we will be happy to assist.

#### **Section 75 Policy Screening**

- 3.9. The Utility Regulator has considered its duties under Section 75 of the Northern Ireland Act 1998.
- 3.10. It is not necessary to carry out an EQIA as the equality impacts are clear from the equality screening. While there may be a minor impact to those persons of age and persons with a disability mitigating measures are already in place.
- 3.11. NIE Networks would not charge a disabled customer to alter the position of their meter where there was an accessibility issue or to replace the meter with a specially adapted meter. This would apply regardless of the meter type e.g. import/export.

## 4. Acronyms and Glossary

Agent	An Agent acts as a cooperative by aggregating power from many renewable generators and selling this aggregated power to an electricity supplier
CDA	Central Design Authority
Micro- generator	Micro-generating Plant used to generate electricity. Single phase solar, hydro, wind or electricity storage technologies which generate up to a maximum of 3.68 kilowatts of electricity.  Three phase solar, hydro, wind or electricity storage technologies which generate up to a maximum of 11.04kilowatts of electricity.
MRC	Market Registration Code
NIRO	The Northern Ireland Renewable Obligation
ROC	Renewable Obligation Certificate
Ofgem	Office of Gas and Electricity Markets