

# Review of DUoS Domestic Tariff Charging Methodology

UR Consultation September 2017







# **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: Compliance and Network Operations, Finance and Network Assets, Wholesale, Retail and Consumer Protection and Corporate Affairs. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.

Our Mission

Value and sustainability in energy and water.

Our Vision

We will make a difference for consumers by listening, innovating and leading.

#### Our Values

Be a best practice regulator: transparent, consistent, proportionate, accountable, and targeted.

Be a united team.

Be collaborative and co-operative.

Be professional.

Listen and explain.

Make a difference.

Act with integrity.

## **Abstract**

This paper sets out for consultation the Utility Regulator's (UR) proposals to review the Domestic DUoS Tariff Charging Methodology.

The paper outlines the options which include:

- the retention of the current charging methodology (i.e. a standing charge plus a 'per unit' tariff; or
- the removal of the current standing charge element of the domestic DUoS charge and the introduction of a unit based per KWh unit rate charging structure for Domestic DUoS charges.

Following responses to this consultation, final decisions will be taken late 2017 early 2018.

# **Audience**

Consumers and consumer groups; industry; and statutory bodies.

# **Consumer impact**

This paper sets out the UR's proposals for reviewing the Domestic DUoS Tariff Charging Methodology. If no change were to be made to the current structure it is possible that in the future suppliers may move away from charging a flat unit rate based retail tariff (with no standing charge element) and move to a retail tariff structure which has both a standing charge and unit rate. As such Customers could see the reintroduction of a standing charge in NI retail tariffs. Therefore, the decisions taken could impact on the structure of the electricity bills of NI domestic customers.

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## 1. CONTEXT

#### **Background**

- 1.1 In Electricity, the primary statutory duty of the Utility Regulator (UR) is "to protect the interests of consumers of electricity supplied by authorised suppliers, wherever appropriate by promoting effective competition"<sup>1</sup>.
- 1.2 To help protect the interests of consumers, the UR is considering facilitating the introduction of a unit based (i.e. per kWh supplied) Distribution Use of System (DUoS) charges for domestic customers, as opposed to the current DUoS system for domestics which entails both a volume-related charge and also a "standing charge" element.
- 1.3 This change in the structure of the domestic DUoS charges, (which is charged by NIE Networks to domestic electricity suppliers), would be introduced in order to support the continuation of the status quo in the retail market where there are currently single 'per KWh' unit based retail tariffs for domestic customers, with no standing charges. This is the case with all suppliers in the NI retail market<sup>2</sup> and was the case from 1999 when the then monopoly supplier Power NI introduced a Home Energy tariff with no standing charge in April of that year. This was the first standard domestic tariff in the UK and Ireland that was unit based only. This is still the case today with the regulated Power NI tariff. Other suppliers who have entered the NI domestic supply market currently mimic this charging regime and as such there are presently no standing charges in any of the NI retail domestic tariffs<sup>3</sup>.
- 1.4 The UR consider there to be several significant advantages to the simple 'per unit' domestic charging regime by suppliers. These are detailed later in the paper, but include: transparency of tariffs for domestic customers; simplicity of tariff understanding and comparison; they are supported by consumer groups;

<sup>&</sup>lt;sup>1</sup> Article 12 of the Energy (Northern Ireland) Order 2003.

<sup>&</sup>lt;sup>2</sup> except for Economy 7 customers who do pay a standing charge

<sup>&</sup>lt;sup>3</sup> except for Economy 7 customers who do pay a standing charge

- and they meet EU directive requirements of 'ease of comparison' between tariffs.
- 1.5 Currently distribution use of system network charges (DUoS charges) for domestic properties, which are levied on suppliers by NIE Networks, are made up of two elements: the standing charge and the unit rate. The standing charge for domestic premises (standard rate) from October 2017 this is set at £6.96 per quarter (£27.84 per annum) and a unit rate of 2.678 pence per KWh. As a result, for an average consuming domestic customer (based on 3,200 KWh), over 20% of the network charges a supplier will incur for that customer are currently collected via the standing charge element.
- 1.6 The network company charges each supplier for both the fixed and "per unit" elements. Whilst the standing charge element is fixed and charged on a quarterly basis, the unit rate charge is variable and dependent on usage.
- 1.7 To date, in terms of final end tariffs for customers, suppliers in NI have charged domestic customers (except for Economy 7) a unit based retail tariff, with no standing charge element. This is despite the structure of the domestic DUoS charges they incur from NIE Networks. The DUoS standing charges incurred by suppliers for their domestic customers are 'smoothed out' by the supplier across all its domestic units and included in the single unit charge.

#### **GB** and ROI & wider context of distribution charging

1.8 It is also important to note the wider context in which this project sits. In both the ROI and GB (Significant Code Review) the network charging structures are under review. Developments such as the increasing amount of self-generation on the distribution network system as well as the potential for future storage solutions will have a significant impact on the way in which network charges could/should be structured and developed. An example of this may be where a customer has effectively gone 'off grid' and generates their own electricity but still retains the ability to call on electricity from the grid if required. A customer like this may need to be levied with a standing charge for their connection to reflect that the network must be built to provide their connection even though they might not use it for long periods of time. It is important to bear these developments and context in mind whilst developing

- this review of the DUoS methodology specifically in relation to domestic customers. As the market and technologies develop, there may be a future requirement in NI for a more fundamental review of all transmission and distribution network charging in NI which will take into account those developments currently being considered in the ROI and GB.
- 1.9 However, notwithstanding this wider context and the potential for a more fundamental review, the UR views it necessary, as an interim measure, to consider and consult upon the proposed changes to the current domestic DUoS charging structures. This will facilitate the smooth continuation of the unit based retail tariff regime and ensure a level playing field for all suppliers in the Northern Ireland market.

#### About this document

- 1.10 The purpose of this document is to consult on the proposal to introduce a unit based tariff for domestic customer DUoS charges.
- 1.11 It is anticipated that the work to assess responses to this consultation will be completed during 2017, with a final decision paper by the end of 2017.
- 1.12 The document is structured as follows:
  - Section 2 outlines the background and issues;
  - Section 3 discusses the options for consultation;

#### **Equality considerations**

- 1.13 As a public authority, the UR has a number of obligations arising from Section75 of the Northern Ireland Act 1998. These obligations concern the promotion of equality of opportunity between:
  - i. persons of different religious belief, political opinion, racial group, age,
     marital status or sexual orientation;
  - ii. men and women generally;
  - iii. persons with disability and persons without; and

- iv. persons with dependants and persons without.
- 1.14 The UR must also have regard to the promotion of good relations between persons of different religious belief, political opinion or racial groups.
- 1.15 In the development of its policies the UR also has a statutory duty to have due regard to the needs of vulnerable customers i.e. individuals who are disabled or chronically sick, individuals of pensionable age, individuals with low incomes and individuals residing in rural areas. Some of the above equality categories will therefore overlap with these vulnerable groupings.
- 1.16 In order to assist with equality screening of the proposals contained within this consultation paper, the UR requests that respondents provide any information or evidence in relation to the needs, experiences, issues and priorities for different groups which they feel is relevant to the implementation of any of the proposals. Furthermore, the UR welcomes any comments which respondents might have in relation to the overall equality impact of the proposals.
  - Q1. Do respondents agree that where this consultation has an impact on the groups listed, those impacts are likely to be positive in relation to equality of opportunity for energy consumers?
- Q2. Do respondents consider that the proposals for the review of the Domestic DUoS methodology need to be refined in any way to meet the equality provisions? If so, why and how? Please provide supporting information and evidence.

#### Responding to this consultation

- 1.17 The UR is keen to hear all stakeholder views on the proposals set out in this consultation paper.
- 1.18 We would like to advise respondents that, in keeping with Section 65 of the Fresh Start Stormont Agreement, the maximum time period required for consultations is normally now 8 weeks.
- 1.19 It is our intention to comply with this requirement.

Responses to this consultation should be forwarded to reach the UR on or before 4pm on 22<sup>nd</sup> November to:

Nicola Sweeney

The Utility Regulator

**Queens House** 

14 Queen Street

**Belfast** 

BT1 6ED

Email: Nicola.Sweeney@uregni.gov.uk

- 1.20 Your response to this consultation may be made public by the UR. If you do not wish your response or name made public, please state this clearly by marking the response as confidential. Any confidentiality disclaimer that is automatically produced by an organisation's IT system or is included as a general statement in your fax or coversheet will be taken to apply only to information in your response for which confidentiality has been specifically requested.
- 1.21 Information provided in response to this consultation, including personal information may be subject to publication or disclosure in accordance with the access to information regimes; these are primarily the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 1998 (DPA). If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things with obligations of confidence.
- 1.22 In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Authority.
- 1.23 This document is available in accessible formats. Please contact: Nicola Sweeney on 028 9031 6622 or nicola.sweeney@uregni.gov.uk

## 2. BACKGROUND & ISSUES

- 2.1 As highlighted in the context in Section 1, NIE Networks currently charge domestic DUoS tariffs to suppliers that are based on both a "standing charge" and a volume based "per unit" element. To date, all electricity suppliers in NI 'smooth out' their domestic DUoS standing charges costs so that all domestic consumers (except Economy 7) see a unit based retail tariff i.e. one single unit rate charged for each unit consumed.
- 2.2 This situation originated in the late 90's when NIE Supply was the monopoly domestic supplier in NI. At that time standing charges were used by the supplier to collect the DUoS standing charge element from each domestic premises.
- 2.3 The Regulator at the time (Ofreg) worked along with NIE Supply (now Power NI) to examine the issues and regulatory policy goals. These were specifically in relation to pricing issues which impacted upon 'fuel poor' and vulnerable customers in Northern Ireland, and energy efficiency goals.

#### 2.4 This included:

- examining the impact of retail standing charges on low consumption domestic customers; and
- establishing a new prepayment system which supported a retail end price that was either the same or lower than standard tariffs.
- 2.5 The outcome of this collaboration between Ofreg and Power NI was the introduction in 1999 of the regulated domestic 'Home Energy' tariff which had no standing charge. This meant that there was one unit rate charged regardless of the volume used by the customer. It was also anticipated that a unit based tariff may encourage large domestic users to be more energy efficient as higher users would be penalised for their large usage by paying more than the standing charge associated with their property.
- 2.6 Following on from this, the keypad prepayment system was introduced in NI in 2000. This has been extremely successful with a wide cross section of

customers choosing to use a keypad meter as opposed to a credit one.

Currently circa 43% of all domestic electricity customers in NI use the keypad prepayment system.

#### **Development of the competitive retail market**

- 2.7 The systems and procedures which allowed domestic customers to switch were in place from 2007. However, first supplier entry into the domestic market in NI didn't occur until 2010. Since then there has been relatively healthy domestic market activity. There are a number of active suppliers in the market offering customers a choice. Power NI has gone from being the single monopoly supplier with 100% market share to a c.62% domestic market share.
- 2.8 All suppliers offer unit based retail tariffs to compete with the Power NI unit based retail tariff; and do not have tariff offerings which include standing charges. Consumers thus benefit from simplicity in charging and in being able to easily compare tariff offerings across suppliers. This benefit to customers helps the UR meet its statutory obligations for retail tariffs to be comparable and easily understood and has been reported upon to the EU Commission as part of compliance to demonstrate meeting the obligation of easily understood tariffs.

#### **Issue with current arrangements**

2.9 The current arrangements, with no retail standing charges for domestic customers, are not a requirement of supply licences. Rather, it has been achieved through historical agreement with Power NI, and other newer suppliers have followed suit and offer a unit based retail tariff rate dependent on payment type. The UR is supportive of this approach to setting domestic retail tariffs for various reasons discussed below, and are considering the new domestic DUoS charging regime to help maintain that retail tariff set-up. We have not mandated volume-related only domestic retail tariffs to date. If the UR were to proceed with the policy to introduce unit based DUoS tariffs for domestic customers, then we would also have to consider if there is a

- requirement for a retail licence obligation i.e. to introduce a licence condition to prohibit standing charges in retail domestic tariffs.
- However, we are also conscious that the practice of 'smearing' the DUoS standing charges element of network costs over all units has some distortive effects on the end user retail price. Larger domestic users are making a bigger contribution to cover the fixed standing charges cost faced by suppliers whilst smaller domestic users may not be contributing enough to cover it. In this context, in a market with unit based retail tariffs across the board (as NI is currently in the domestic market, except for Economy 7), those suppliers with larger consuming customers have an advantage over those with smaller consuming customers as both suppliers have to pay NIE Networks the same standing DUoS cost for each one of their customers. It may also lead to a scenario where a supplier with smaller consumption customers may wish to introduce a standing charge on retail bills to cover the network costs for the individual customer. In this scenario with the standing charges charged by NIE Networks for each property being 'smeared' over a smaller number of units for a supplier with smaller consuming customers, there will be a larger impact on their tariff rate which will need to rise more than the tariff of a supplier with larger customers to cover the total cost of their standing charges. This may distort the market and could have an impact on competition.
- 2.11 This is in effect a market distortion and can only be rectified by:
  - (i) The re-introduction of the cost reflective network standing charge to the retail tariff structure, or
  - (ii) The alignment of the DUoS tariff structure with the unit based retail tariff structure. This would create a 'level playing field' for suppliers (in the context of a continuation of a single unit rate based retail tariff structure across the electricity retail sector in NI) as each supplier will be charged a per unit rate for every unit of electricity they transport through the grid.
  - Q3. Do respondents agree that having a standing charge element in domestic DUoS charges and unit based retail tariffs means there isn't a level playing field for suppliers in the context of the current arrangements where all suppliers charge a unit based retail tariff?

# 3. OPTIONS FOR CONSULTATION

- 3.1 This section of the paper sets out the options for consultation. It also examines the advantages and disadvantages of these options.
- 3.2 Given the background and issues set out in Section 2 of the paper the UR has identified two options which could be implemented.

# Option 1 – Do nothing to current DUoS standing charge structure for domestics

3.3 This option would entail retaining the status quo i.e. the standing charge would remain a separate element of the domestic DUoS network charges paid by suppliers. However, this would not preclude suppliers reintroducing standing charges in their retail tariffs if they wished to do so. If standing charges were to be reintroduced it would make comparability of suppliers' domestic tariffs much more difficult for customers, and work against the vulnerability and energy efficiency goals underlying the original Ofreg decision. It would also be a significant move away from the status quo and may be confusing for customers. Customers groups have said they feel it would be a "regressive" step.

# Option 2 – Introduce "Per Unit" domestic DUoS charges and remove the current standing charges element, and hence help to retain a Unit Based Retail Tariff Structure

3.4 This option would entail the alignment of the DUoS tariff structure with the current unit based retail tariff structure in NI. The current standing charge element of domestic DUoS charges would be smeared equally across all forecast domestic units. As a result, all suppliers would then be charged a per unit rate for domestic DUoS network costs. This in turn would facilitate the continuation of simple united based retail tariffs for domestic customers, but without any potential distortion to the retail market.

- It is important to note that this is in effect the status quo for NI domestic customers. All things being equal, no domestic customer should pay more for **network charges** within their final unit price than they are paying under the current retail tariff structure employed by all NI domestic suppliers.
- 3.5 The UR has had preliminary discussions with NIE Networks regarding the structure of its domestic DUoS tariffs.
- 3.6 These discussions mainly focused on the issue of whether it would be practical to implement unit based domestic DUoS tariffs and what NIE Network's concerns would be if we were to proceed with the implementation of unit based domestic DUoS tariffs.
- 3.7 NIE Networks highlighted that volatility in their under and over recovery ("K" factor) could possibly increase if the DUoS charges for domestic customers were to be changed to be based on a single unit rate. Currently NIE Networks are guaranteed to recover the fixed element from every household regardless of consumption. However, if forecast consumption volumes are wrong they will not collect the correct amount which will go into the NIE Networks "K" factor as an under or over recovery. If standing charges were included in a new single p/kWh rate and the full 100% of revenue is exposed to these forecasting errors, over and under recoveries for NIE Networks could become slightly larger. It is also the case however that NIE Networks will still be 'held whole' with any under or over recovery returned the next year through their next tariffs (network charges). This increased volatility will also increase DUoS annual tariffs movements (increases and decreases) slightly. However, we do not envisage that either of these two issues will be material as the NIE Networks demand forecast for domestic customers is usually reasonably close to the actual outturn consumption.
- 3.8 NIE Networks also stated (as already discussed in Section 1 of this paper) that this is a move away from the current direction of travel in GB regarding network charging structures where there seems to be a move towards more fixed prices. This is to address the trend of customers reducing their consumption and the ability to recover network costs from the appropriate customers (vulnerable customers may end up paying more than they should). The increase in customers with self-generation may lead to a cross subsidisation given that removing the standing charge element from the DUoS charging mechanism will

mean that these customers may not cover their share of the cost of their connection to the network. At the end of 2016 there were circa 15,000 domestic customers in NI with generation (as discussed in Section 1 of this paper future treatment of these "prosumers" will form part of a wider network charging review). However, as the situation currently stands those domestic customers in NI with generation are still importing more than average domestic customers annually (3826 kWh for credit and 3177 kWh for keypad). Hence in a regime of unit based DUoS charging domestic customers with generation would be fully paying for the costs of their connection as would an average consuming domestic customer without generation.

- 3.9 NIEN also raised the point that, in their view there may be an issue with EU Directive compliance in the context of cost reflectivity for tariff charges.
- 3.10 NIE Networks also highlighted that this option would change the published statement of charges. The basis on which NIE Networks are charging domestic suppliers will change. The proposal for Option 2 will fall under Licence Condition 32 of the Electricity Distribution Licence of Northern Ireland Electricity Networks entitled "Basis of Charges for Use of and Connection to the Distribution System". Paragraph 1 of this condition states:

- (a) use of the Distribution System;
- (b) connection to the Distribution System; and
- (c) any other matters for which the Licensee (with the approval of the Authority) levies charges".
- 3.11 In this context the format of the charging statement can change. We are of the view that this change to the statement of charges will be well understood by those using it, which will primarily be suppliers.
- 3.12 NIE Networks have also confirmed to the UR that they can perform the calculations necessary to determine single domestic unit rates for DUoS charges with relative ease. There would be different unit rates for keypad and credit meters as these have different DUoS standing charges today (to reflect the different cost of the meters and the systems needed to operate keypad).

<sup>&</sup>quot;The Licensee shall, as soon as practicable after this Condition comes into effect (and, in any event, not later than such date as the Authority shall specify in directions issued to the Licensee for the purposes of this Condition), prepare a statement approved by the Authority setting out the basis upon which charges will be made, as part of the Distribution Business, for:

This is not an issue as today keypad and non-keypad retail tariffs are slightly different for various reasons including the current DUoS standing charge difference. It would be the intention to maintain the same relativity in terms of price difference going forward between a credit meter and keypad meter if there were a move from a separate standing charge and unit rate to one combined unit rate.

- 3.13 NIE Networks also raised a point that to continue treating Long Term Vacant (LTV) sites as they are treated currently i.e. the supplier is charged a standing charge only for the site, some system changes may be required that may impact both NIE Networks and suppliers. However this would require further investigation.
- 3.14 If this option were to be implemented the UR may consider the introduction of licence obligations on suppliers to charge a unit based retail tariffs i.e. no standing charge for domestic customers (as they do today, except for Economy 7 customers), so that the tariff reflects the network charge structure i.e. based on unit rates. The UR recognises that such an obligation may limit the number and type of tariffs suppliers could offer, but is of the view that if this obligation were to be included in supply licences it would be to the benefit of the market and would promote competition e.g. ease of tariff comparison, simplicity of tariff understanding, and also be of benefit to the customer.

#### Advantages and Disadvantages of identified options for consultation

3.15 It is important to consider the benefits and drawbacks of the two options for consultation if either were to be carried forward and proposed as would be the case for option 1, or implemented as in the case of option 2.

# Advantages and disadvantages of Option 1 – Do nothing to the current DUoS standing charge structure for domestics

3.16 There are a number of advantages and disadvantages with Option 1, but on balance we consider that there are more disadvantages associated with it than advantages.

#### **Advantages**

- the ability for the supplier to recover the cost of the DUoS standing charge from the customer it is derived from; and
- 2) the tariff which is being charged is more fully "cost reflective" under the current DUoS charging structure.

#### **Disadvantages**

- low volume users being required to pay a standing charge regardless of their usage (whilst strictly cost reflective this is not the case today in a domestic retail market that has only unit based retail tariffs);
- 2) less protection of vulnerable customers;
- 3) less transparency in tariffs with tariffs being more complex due to the standing charge element
- 4) more difficult to compare tariffs which may hinder customers' willingness to switch
- 5) may be seen as a regressive step; and
- 6) may create confusion for less informed customers.

Advantages and disadvantages of Option 2 – Introduce "Per Unit" domestic DUoS charges and remove the current standing charge element, and hence help to retain a Unit Based Retail Tariff Structure

3.17 There are a number of advantages and disadvantages with Option 2 but on balance we consider that there are more advantages associated with it than disadvantages.

#### **Advantages**

- 1) protection of low volume users and those who are potentially fuel poor, they don't have a fixed standing charge regardless of usage;
- 2) protection of vulnerable customers for the same reason as above;
- 3) improves energy efficiency incentives for larger users
- 4) tariff transparency as it makes tariffs simple and therefore easy to understand. This helps with meeting our statutory duties on "ease of comparison"; as well as media messaging and explanation of percentage increases/decreases; and
- 5) comparability of tariffs made easier for customers wanting to compare supplier offers.

#### **Disadvantages**

1) the tariff being charged is not fully cost reflective; and

- 2) there is a risk of increased volatility for NIE Networks revenues as by changing to a unit rate to collect both the fixed and variable element of their costs they are exposed to slightly more volume risk i.e if the units consumed aren't as high as expected they will not recover all the required revenue in that year (this will built into their tariff the following year). However, we do not envisage that this issue will be material as the NIE Networks demand forecast for domestic customers is usually reasonably close to the actual outturn consumption.
- Q4. Do respondents agree that there are only two options? If you identify any alternative option please provide a full explanation.
- Q5. Do respondents have any views on the advantages & disadvantages of each option? If so, please give a full explanation.
- Q6. If option 2 was chosen and implemented do respondents think that there should be a supplier licence obligation to charge unit based domestic retail tariffs i.e. no standing charges?

# 4. CONSULTATION QUESTIONS

- 4.1 The UR is keen to hear the views of interested stakeholders and invite representations on the following questions:
  - Q1. Do respondents agree that where this consultation has an impact on the groups listed, those impacts are likely to be positive in relation to equality of opportunity for energy consumers?
  - Q2. Do respondents consider that the proposals for the review of the Domestic DUoS methodology need to be refined in any way to meet the equality provisions? If so, why and how? Please provide supporting information and evidence.
  - Q3 Do respondents agree that having a standing charge element in domestic DUoS charges and unit based retail tariffs means there isn't a level playing field for suppliers in the context of the current arrangements where all suppliers charge a unit based retail tariff?
  - Q4. Do respondents agree that there are only two options? If you identify any alternative option please provide a full explanation.
  - Q5. Do respondents have any views on the advantages & disadvantages of each option? If so, please give a full explanation.
  - Q6. If option 2 was chosen and implemented do respondents think that there should be a supplier licence obligation to charge unit based domestic retail tariffs i.e. no standing charges?

#### **Timeframe and next steps**

4.2 The UR welcomes stakeholder views on the proposals laid out within this document.

4.3 Responses to this consultation should be forwarded to reach the UR on or before 4pm on 22<sup>nd</sup> November 2017 to:

Nicola Sweeney

The Utility Regulator

**Queens House** 

14 Queen Street

Belfast

BT1 6ED

Email: Nicola.Sweeney@uregni.gov.uk

5.1 Feedback to this consultation from interested stakeholders will help to shape the UR's decision paper which is planned for later in 2017. The decision paper will include details of respondents' feedback to this consultation and include the UR's decisions with regards to the Review of DUoS Tariff Methodology.