



Consultation on the options for co-ordinating the relinquishing of firmus energy's supply exclusivity in the ten towns area

24th August 2010

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Introduction

The Northern Ireland Authority for Utility Regulation (the Utility Regulator) seeks responses to this consultation on the options for co-ordinating the relinquishing of firmus energy's supply exclusivity in the ten towns area.

Background

firmus energy (fe) is a subsidiary of Bord Gais Eireann (BGE) which has been providing gas to customers in the Republic of Ireland for a number of years.

In 2005 fe was granted a licence to Distribute and Supply gas to the following 10 towns in Northern Ireland:

- Londonderry
- Limavady
- Coleraine
- Ballymoney
- Ballymena
- Antrim
- Craigavon (inc Lurgan & Portadown)
- Armagh
- Banbridge
- Newry

Supply exclusivity was granted in the supply licence in order to allow development of the distribution network to work in tandem with the volume incentive enshrined within the distribution price control. This was similar to the supply exclusivity that was previously granted to Phoenix Natural Gas Ltd. in Greater Belfast.

fe have a volume incentive under the regulatory distribution price control which is designed to incentivise fe to gain customers at the important early stage of network development. fe therefore price competitively relative to alternative energy sources in order to get customers connected to gas. During supply exclusivity there is no published distribution tariff and fe can charge below what the full distribution costs would be during

this period (essentially a “shadow” distribution charge). fe do however have to recoup the costs of rolling out the network over the full development period.

When exclusivity ends fe have to publish a distribution charge that is economically justifiable (ie reflective of the development costs of the network) and not in excess of an allowed cap. Other suppliers can then compete against fe supply and this charged distribution tariff is passed on to customers.

The Utility Regulator has made no decision on supply price control issues in the ten towns area and whether a regulated supply tariff will be required when exclusivity is relinquished. These issues will be consulted on at some point in the future.

Current Position

The current position in relation to the relinquishing of supply exclusivity is as defined in firmus energy’s (fe) licence. Essentially as soon as fe enter one of the defined ten towns the clock for the loss of supply exclusivity starts running from the following April with supply exclusivity expiring 5 years later for large I&Cs (Industrial and Commercials) and 8 years later for small I&Cs and domestics. The tables in Annex 1 show how this will work based on when fe actually entered the towns:

It is immediately obvious from the tables in Annex 1 that there is a spread of dates for both large I&C customers and also for small I&Cs and domestic customers.

Market opening in the Greater Belfast area occurred in a similar fashion to this, where supply exclusivity was relinquished at a different time in each area depending on the date at which that area was first developed. However in the earlier stages of market opening in Greater Belfast, and up until all of the areas were open, there was very limited interest from competing suppliers and therefore the issue of switching system infrastructure and retail arrangements did not arise.

Market opening will require a distribution code, a distribution tariff and retail processes with the associated switching systems and back office support. In addition market opening may also require a price control with an associated regulated tariff to be considered for all sectors of the market.

Rationale for doing anything different

Firstly the default position is that market opening will proceed in the timetable as set out in the tables in Annex 1, which is fe’s current licence position.

The following are some of the issues associated with a non co-ordinated approach to market opening as is currently presented by the licence:

- Confusing for customers (especially domestic customers) in understanding why tariffs differ in different towns within the ten towns area
- Confusing for customers in understanding which towns are open within the ten towns area and why
- Confusing for suppliers entering the market (market and advertising difficulties)
- Potential for stranded resources associated with interim codes and switching systems
- Cost implications (ultimately borne by customers) of implementing a network code prior to CAG (Common Arrangements for Gas) and having to amend this post CAG
- Implications for allowance in the price control

Supplier and Customers Confusion and Complexity Issues

The staggered market opening timetable does present an up-front difficulty in considering how a regulated supply tariff would work. Firstly if there was a regulated tariff in one area and not in another it would be necessary to determine how the supply operating costs are apportioned across each of the ten towns. Secondly it could be difficult to explain to customers why the tariffs differ in the same market sector in separate towns within the ten towns distribution area. Furthermore it could also be the case that in some instances the opening of the market could give rise to larger tariffs in areas where the market is open than where it is not as there is no margin for fee in the areas where there is exclusivity.

These issues could have developed in Greater Belfast but did not largely due to the very limited interest from competing suppliers at the time. However we do wish to see the benefits of effective competition develop in the ten towns area in a co-ordinated and efficient manner over the period and see some of these potential issues resolved.

Question 1 - Do respondents agree that the current staggered market opening timetable presents potential difficulties and confusion for customers in understanding the different tariffs across the same sectors in different towns? What impact, if any, do respondents consider this could have on the development of competition in the ten towns area?

Another aspect of potential customer confusion is understanding which sectors within each of the towns are open within the ten towns area and why. Due to the staggered market opening timetable customers in some of the towns will be able to choose supplier and at the same time customers in the same market sector in other towns will not. This issue is likely to be more confusing for domestic and small I&C customers than for large I&C customers.

This difficulty could also apply to suppliers in understanding which areas are open for which sectors and which customers are available to switch. The supply licences would have to be issued and amended on request by the Utility Regulator for each of these areas as they become open. Additionally there could be an issue in suppliers' advertising, where the message could potentially cause further customer confusion.

Question 2 - Do respondents consider that under the current arrangements there is potential for confusion for customers in understanding which sectors in which towns are open to competition? If so what is the impact on the different sectors and on how suppliers advertise?

Codes, Switching System and Associated Cost Issues

Market opening, when supply exclusivity is relinquished, will require a distribution network code and retail processes with the associated retail switching systems and back office support. As the licence stands this issue will have to be addressed in advance of April 2011 for large I&Cs and in advance of April 2015 for domestics and small I&Cs. The costs of producing a network code and developing necessary IT systems in support of the retail switching systems can be high. Nevertheless this has to be done for the ten towns area so the question is how can this be done most efficiently for the relatively small numbers of customers in the ten towns area (ref Appendix 2). Allowable costs associated with this would ultimately be borne by customers through the distribution charge. Additionally we have to consider if this issue has any impact on consideration of the market opening timetable.

The CAG (Common Arrangements for Gas) program is in the first instance looking at harmonising transmission arrangements and codes on an all island basis. Subsequently there will be an opportunity to look at the distribution codes and retail arrangements (CAG retail). The CAG timetable is currently being worded on by both RA's but it is hoped that the CAG transmission arrangements will be put in place during 2012. The CAG retail arrangements will follow after the transmission arrangements have been put in place.

The CAG retail program will be looking at harmonisation of codes and potentially also the switching systems required for market opening on an all island basis. There is an issue in that the scope for CAG retail has not been finalised, however if this work could be availed of to some extent it could potentially save time and effort in developing separate codes and retail systems.

There are three potential options for a distribution code in the ten towns area:

1. Develop a bespoke network code specifically for the ten towns area
2. Use the existing Gaslink code– two codes in NI and two sets of retail processes
3. Use the existing PNGL code – fe would have change retail processes and associated IT systems

The Utility Regulator is currently examining these options with fe.

The first proposal would represent the worst of all possible worlds in that there would be the full cost of developing a bespoke code and when CAG retail subsequently examines harmonisation options there would then be three codes to consider on the island rather than the two options that the second and third proposals present (ie PNGL code and Gaslink code). Having an additional bespoke code for the ten towns area would considerably add to the complexity and therefore the cost of sorting out CAG retail arrangements.

For the second proposal there would be some work involved in separating out the necessary distribution section of the Gaslink code for April 2011. This is because the Gaslink code is a Unified Code of Operations encompassing transmission, distribution and retail arrangements so work would be required to ensure that it works for the different transmission arrangements in Northern Ireland (NI). As well as considering the cost implications of doing this it would be important to ensure that producing a distribution code for the ten towns area from the Gaslink code did not end up with a very different code, which in essence could amount to the undesirable first proposal. Prior to CAG retail arrangements being in place employing the Gaslink code would result in two sets of retail processes in NI and the impact of this would have to be considered. Switching systems and processes would have to be put in place in any event.

If however the CAG transmission arrangements are in place (due in 2012), where there will be a single transmission code across the whole island, the work involved in separating out the distribution section of the Gaslink code would be significantly reduced. This is because the transmission codes in NI and RoI would then be harmonised. Thus the link between the distribution code and the transmission code in the Gaslink code in RoI would be identical to the link with the Gaslink distribution code and the same harmonised transmission code in NI. The Gaslink distribution code could then be employed in the ten towns without alteration. To avail of this some of the towns

would have to have their market opening timetables moved back to April 2013 for large I&C customers (ref Appendix 1). We would still have the issue that employing the Gaslink distribution code would result in two sets of retail processes in NI.

The third proposal would have the advantage that the PNGL code could be employed without having to be changed and without delay to the market opening timetable for Large I&Cs. However the internal retail systems and processes would have to be changed with the associated costs and again switching systems and processes would have to be put in place. Prior to CAG retail being in place this has the advantage of having only one set of retail processes in NI.

The switching system implementation cost considerations are different for the different sectors of the market that we are examining. As there are currently only 300 meter points (fewer customers as some customers have multiple meter points) in the entire large I&C sector for the ten towns (only 27 meter points in the first town due for opening in April 2011) it is likely that switching arrangements could be handled largely manually. Thus large I&C switching arrangements costs could be kept low whichever code is chosen.

Estimated Costs of Interim Code and Switching System Options for Large I&C Customers

	PNGL code	Gaslink Code	Bespoke Code	Wait for CAG Retail
Estimated Cost of Code	Low	Medium (prior to CAG transmission) Low (after CAG transmission)	High	Marginal cost zero
Estimated cost of switching System arrangements	Low (manual)	Low (manual)	Low (manual)	Marginal cost zero
Estimated cost impact on fe's back office systems	Medium	Low	Low	Marginal cost zero

Estimated Costs of Interim Code and Switching System Options for Small I&C and Domestic Customers (assumes that CAG transmission arrangements are in place)

	PNGL code	Gaslink Code	Bespoke Code	Wait for CAG Retail
Estimated Cost of Code	Low	Low	High	Marginal cost zero
Estimated cost of switching System arrangements	Medium	Medium	High	Marginal cost zero
Estimated cost impact on fe's back office systems	Medium	Low	Low	Marginal cost zero
Marginal Cost Impact of Code Choice on CAG	Low	Low	High	Zero

Key to costs: Low < £100k; Medium ~ £100k; High > £200k

There is therefore potential for a reasonably low cost code solution and system arrangements to be put in place for large I&C customers by availing of an existing code and having pragmatic, simple and inexpensive switching arrangements. The lowest cost option of availing of the Gaslink distribution code after CAG transmission arrangements are in place would necessitate considering a market opening date of April 2013 for large I&C customers.

Alternatively the additional costs could be accepted for either employing the PNGL code and changing the fe back office systems or for amending the Gaslink distribution code to work with the current NI transmission arrangements. These costs would potentially be stranded but would accommodate the current market opening timetable of April 2011 for these large I&C customers (27 meter points in April 2011 and 80 meter points in April 2012).

The additional complexity and larger number of domestic and smaller I&C customers means that for this section of the market the market opening costs are a lot higher. The first towns due for market opening in the smaller I&C and domestic sector are not due until April 2015. It may be possible for the small I&C and domestic sector to avail of CAG retail arrangements. However as the CAG retail scope and its' implementation has not been confirmed we will have to make the best decision for the situation as it is now and try to ensure that these decisions do not close any doors that could allow NI customers to benefit from the potential lower costs of such arrangements in the future.

Question 3 - What are the views of respondents on the choice of network codes and associated costs? What considerations are most pertinent for switching system implementation and the associated costs?

Options

1. Do nothing

Doing nothing is not a passive option. It requires fe to develop a distribution code, publish a distribution tariff and put in place arrangements for switching. This would be required in time for 1st April 2011 for large I&Cs and for 1st April 2015 for the relatively larger number of small I&Cs and domestics. The responsibility lies with fe to put arrangements in place.

Difficulties in relation to the tariffs and confusion for customers across the different towns have been discussed above and these issues would have to be addressed.

There is a stranded cost consideration for arrangements for Large I&Cs. If the Gaslink distribution code is employed (prior to CAG transmission being in place) then it would

have to be amended to work for NI. Alternatively if the PNGL distribution code is employed then there are back office systems cost implications for fe. Both these alternatives would incur stranded costs of a similar magnitude, however employing the PNGL code would result in a single set of retail processes in NI whereas employing the Gaslink code would result in two sets of retail processes in NI.

2. Open all large I&Cs at one time and all small I&Cs and domestics at a separate later time

We could consider opening all large I&Cs at one time for the whole ten towns area and all domestics and smaller I&Cs at a separate, later date. Coordinating the tariffs across all the towns and across the two main sectors (ie large I&C and, small I&C and domestics) solves the problem of customer confusion in relation to different tariffs identified above. Additionally customers in each market sector across all the towns can choose a supplier at the same point in time as the market opens for each sector across all the towns at the same time.

If a median date of April 2013 for large I&Cs was selected the CAG transmission work should be complete. This would allow the selection of the Gaslink distribution code with no amendments necessary for the transmission arrangements in NI (as they would be the same as for Rol at that juncture). This would be the lowest cost solution to selecting a distribution code and there would be no stranded costs as identified for option 1.

The switching infrastructure and necessary back office support required for the small numbers of large I&Cs would be minimal.

We have already pointed out that it could send out very a confused message to domestic customers if some towns were opened before others. It would also be very difficult to have to potentially price control and set regulated supply tariffs for different fractions of the domestic market in the ten towns area, with associated further customer and supplier confusion. The selection of a single date of April 2015 for this section of the market for all the towns (thus bringing forward market opening for all domestic and small I&C customers to the earliest date) could solve these problems.

Bringing forward the market for some domestic customers and small I&Cs could offset the delay for the few areas and small numbers of large I&Cs that would be pushed back to a degree. Appendix 3 shows the position as it is now and the position as it is anticipated it will be in April 2015 for small I&Cs and domestics and for April 2013 and April 2015 for large I&Cs in terms of growth. Necessary assumptions have been employed in estimating the growth.

The table for large I&Cs allowing for growth forecasts for the position as at April 2013 (ref. Appendix 3) shows that at this stage if the large I&C market was opened 28 meter points would have been delayed from April 2011 and 99 meter points would have been delayed from April 2012. While this is relatively few in terms of numbers the volumes are more significant (a total of 39% of the total large I&C market in the ten towns in terms of gas volumes as at April 2013).

The table for small I&Cs and domestics allowing for growth forecasts for the position as at April 2015 (ref. Appendix 3) shows that at this stage 6478 customers would be brought forward to this market opening date. This represents bringing forward market opening for 36% of the domestic and small I&C market across the ten towns at this point in time.

The question is whether this option presents a good balance of neutrality in terms of benefits to be whilst allowing most domestic customers to avail of an earlier, co-ordinated approach to market opening at minimal cost.

3. Open the whole market at a single time (ie Large I&Cs, small I&Cs and domestics)

We could consider opening the whole market at one time. One option here would be to defer the opening of the larger I&C market to align with the later opening date of the small I&Cs and domestics (ie April 2015). The rationale for waiting to this date for large I&Cs is less strong however and hinges on it being too difficult and/or expensive to have a code and switching systems in support of this in the interim, which does not seem to be the case.

If CAG retail was implemented in time for April 2015 some costs associated with the arrangements for small I&Cs and domestics would be saved. However this would not necessitate any delay to the current timeline for the relinquishing of exclusivity for small I&Cs and domestics in any town as the earliest is currently April 2015.

Under option 2 it was considered that bringing forward the market for most domestic customers could offset the delay for the few areas of large I&Cs that would be pushed back. This balance of neutrality in terms of benefits to be would not be present in option 3. Considering an earlier date of April 2014 for the whole market could solve this question of balance, however it is less likely that CAG retail arrangements will be in place at this earlier date than the later date of April 2015.

OPTION	PROPOSED MARKET OPENING DATE
Option 1	Opening dates for towns as per current licence Large I&C customers – April 2011 to April 2015 Small I&Cs and Domestic customers – April 2015 to April 2018
Option 2	All Large I&C customers – April 2013 (median date) All Small I&Cs and Domestic customers – April 2015 (earliest date)
Option 3	All Customers - April 2015

Considerations

The relevant Utility Regulator’s (the “Authority”) objectives in respect of gas are set out in Section 14 of the Energy (Northern Ireland) Order 2003. There is a principal objective set out under Section 14 (1):

(1) The principal objective of the Department and the Authority in carrying out their respective gas functions is to promote the development and maintenance of an efficient, economic and co-ordinated gas industry in Northern Ireland.

In reviewing the current arrangements we are therefore considering the “efficient, economic and co-ordinated” aspects of this issue in our role as regulator as well as the impact of any decision on development of the industry.

Additionally the Utility Regulator has a duty to facilitate supply competition as stated in the Energy (Northern Ireland) Order 2003 Section 14 (5):

(5) Subject to paragraph (2), the Department and the Authority shall carry out their respective gas functions in the manner which it considers is best calculated –

- (a) ...*
- (b) ...*
- (c) ...*

(d) to facilitate competition between persons whose activities consist of or include storing, supplying or participating in the conveyance of gas;

Thus the Utility Regulator will also consider the best manner in which effective competition can be introduced to the ten towns area.

We will also be taking into account the overall benefits for customers as a whole in the ten towns area. Additionally the Utility Regulator would prefer a coordinated approach to the introduction of competition in the ten towns area.

One key question is whether delaying the relinquishing of exclusivity for some of the towns and bringing forward the relinquishing of exclusivity for other towns is reasonable. The Utility Regulator would be particularly interested in the views of affected customers (and consumer groups representing them) on the potential impact.

The tables in Annex 2 show what the current volumes and meter numbers are in each town by sector and this data has been collated for comparative purposes in Annex 3. It has to be noted that there is significant headroom for domestic sector numbers and volumes to grow, whilst the majority of large I&Cs have already connected. Allowing for domestic market growth in essence competition will be delivered earliest for the greatest number of customers under option 2. In terms of volumes, even allowing for domestic growth, there is an overall delay under option 2 and a larger delay under option 3. This is largely due to the large volumes associated with the relatively few large I&Cs currently due to be open in April 2011 and April 2012. So the question is one of the best balance overall for customers in opening up the market to competition.

Whilst the options to avail of CAG retail arrangements for domestics and small I&Cs can be kept open under most scenarios (ie April 2015) it is only by delaying the market opening date for some large I&Cs (to April 2013) that cost savings here are likely to be able to be availed of due to CAG transmission arrangements. The main consideration is therefore whether the cost savings likely to be gained in pushing back the date for some large I&Cs to potentially avail of CAG cost savings warrants the potential delay of market opening for these customers. The metrics for consideration include the relatively small numbers of large I&Cs involved, the relatively large volumes for the large I&Cs involved, and the potential actual costs that could be saved.

Question 4 – Which option do respondents consider presents the best alternative, based on considerations of minimal costs, least confusion for customers and availing of effective competition at the earliest possible opportunity for customers? What arguments are there (based on cost, market clarity and competition considerations) for the alternative options? Is there an alternative option not presented in this paper or a refinement of one of the options that might be more optimal?

Responding to the Consultation

The Utility Regulator welcomes responses to the questions raised in this consultation and any additional comments or views respondents may wish to make in respect of the consultation. Please send responses, stating whether you are happy for the response to be made public, by 5:00pm on 21st September 2010 to:

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Or E-mail neil.bingham@uregni.gov.uk

Summary of Questions Raised in the Consultation

Question 1 - Do respondents agree that the current staggered market opening timetable presents potential difficulties and confusion for customers in understanding the different tariffs across the same sectors in different towns? What impact, if any, do respondents consider this could have on the development of competition in the ten towns area?

Question 2 - Do respondents consider that under the current arrangements there is potential for confusion for customers in understanding which sectors in which towns are open to competition? If so what is the impact on the different sectors and on how suppliers advertise?

Question 3 - What are the views of respondents on the choice of network codes and associated costs? What considerations are most pertinent for switching system implementation and the associated costs?

Question 4 – Which option do respondents consider presents the best alternative, based on considerations of minimal costs, least confusion for customers and availing of effective competition at the earliest possible opportunity for customers? What arguments are there (based on cost, market clarity and competition considerations) for the alternative options? Is there an alternative option not presented in this paper or a refinement of one of the options that might be more optimal?

Appendix 1

Large I&C connections (expected to exceed 732,000kWh (25,000 tpa)):

Development area	Fit meter date	Commencement date – 1st April next following start date	Exclusivity End date Expire 31st March 5 yrs thereafter
Antrim	May 07	April 08	April 2013
Armagh	Q2 09	April 10	April 2015
Ballymena	Dec 05	April 06	April 2011
Ballymoney	Jul 06	April 07	April 2012
Banbridge	Jul 07	April 08	April 2013
Coleraine	Jul 06	April 07	April 2012
Craigavon	Oct 07	April 08	April 2013
Derry	May 06	April 07	April 2012
Limavady	Oct 06	April 07	April 2012
Newry	Sep 07	April 08	April 2013

Small I&C and domestics (expected not to exceed 732,000 kWh(25,000 tpa)):

Development area	Fit meter date	Commencement date – 1st April next following start date	Exclusivity End date Expire 31st March 8 yrs thereafter
Antrim	Feb 07	April 07	April 2015
Armagh	Q3 09	April 10	April 2018
Ballymena	Jul 06	April 07	April 2015
Ballymoney	Sep 06	April 07	April 2015
Banbridge	May 07	April 08	April 2016
Coleraine	May 06	April 07	April 2015
Craigavon	Apr 07	April 08	April 2016
Derry	May 06	April 07	April 2015
Limavady	Sep 06	April 07	April 2015
Newry	Oct 07	April 08	April 2016

Appendix 2

10 towns by town and market sector – July 2010			
Town	No. of Meterpoints - Large I&C Connections	No. of Meterpoints- Small I&C and domestic	Total
Antrim	116	1550	1666
Armagh	0	53	53
Ballymena	27	865	892
Ballymoney	12	363	375
Banbridge	10	418	428
Coleraine	16	831	847
Craigavon	53	1006	1059
Derry	45	2186	2231
Limavady	7	307	314
Newry and Mourne	14	431	445
Total	300	8010	8310

10 towns volume by town and market sector-July 2010

Town	Volumes - Large I&C (MWh)	Volumes- Small I&C and domestic (MWh)	Total
Antrim	75,000	20,000	95,000
Armagh	-	1,000	1,000
Ballymena	179,000	17,000	196,000
Ballymoney	11,000	5,000	16,000
Banbridge	88,000	7,000	95,000
Coleraine	45,000	14,000	59,000
Craigavon	324,000	15,000	339,000
Derry	83,000	51,000	134,000
Limavady	7,000	7,000	14,000
Newry and Mourne	9,000	10,000	19,000
Total	821,000	147,000	968,000

Appendix 3

Current (on July 2010) Large I&C Numbers and Volumes Collated by Market Opening Date

Exclusivity End Date	No. of Meterpoints- Large I&C Connections	Volumes - Large I&C (MWh)
Apr 2011	27	179000
Apr 2012	80	146000
Apr 2013	193	496000
Apr 2014	0	0
Apr 2015	0	0

Expected (on April 2013) Large I&C Numbers and Volumes Collated by Market Opening Date

Exclusivity End Date	No. of Meterpoints- Large I&C Connections	Volumes - Large I&C (MWh)
Apr 2011	28	180,000
Apr 2012	90	166,000
Apr 2013	208	550,000
Apr 2014	0	0
Apr 2015	0	0
Apr 2016	5	18,000

Changing market opening to April 2013 for all large I&Cs would result in the following:

Exclusivity End Date	No. of Meterpoints- Large I&C Connections	Volumes - Large I&C (MWh)
Apr 2013	331	914,000

Expected (on April 2015) Large I&C Numbers and Volumes Collated by Market Opening Date

Exclusivity End Date	No. of Meterpoints- Large I&C Connections	Volumes - Large I&C (MWh)
Apr 2011	28	180,000
Apr 2012	99	179,000
Apr 2013	221	586,000
Apr 2014	0	0
Apr 2015	0	0
Apr 2016	9	30,000

Changing market opening to April 2015 for all large I&Cs would result in the following:

Exclusivity End Date	No. of Meterpoints- Large I&C Connections	Volumes - Large I&C (MWh)
Apr 2015	357	975,000

Current (on July 2010) Small I&C and Domestic Numbers and Volumes Collated by Market Opening Date

Exclusivity End Date	No. of Meterpoints- Small I&C and Domestic Connections	Volumes - Small I&C and Domestic Connections (MWh)
Apr 2015	6102	124000
Apr 2016	1855	22000
Apr 2017	0	0
Apr 2018	53	1000

Expected (on April 2015) Small I&C and Domestic Numbers and Volumes Collated by Market Opening Date

Exclusivity End Date	No. of Meterpoints- Small I&C and Domestic Connections	Volumes - Small I&C and Domestic Connections (MWh)
Apr 2015	11,422	208,000
Apr 2016	6,005	22,000
Apr 2017	0	0
Apr 2018	473	1,000

Bringing market opening forward to April 2015 for all small I&Cs and domestics would result in the following:

Exclusivity End Date	No. of Meterpoints- Small I&C and Domestic Connections	Volumes - Small I&C and Domestic Connections (MWh)
Apr 2015	17,900	231,000