

Greg Irwin
The Utility Regulator
Queens House
14 Queen Street
Belfast
Date: 27th February, 2013

Reviewing Consultation guidance – a discussion paper.

Dear Greg,

Electric Ireland welcomes the opportunity to comment on the Utility Regulator discussion paper on consultation guidance.

The paper is an appropriate and timely reflection on how the existing consultation guidance and process is working and makes some very interesting suggestions on how the process can be enhanced. Electric Ireland acknowledges fully the spirit in which these comments have been made and believe it will further complement and enhance the already high standards in place within the NIAUR consultation process. Indeed, for complete consistency, we would welcome an extension of these standards to apply in all consultations undertaken within the overall remit of NIAUR, including, for example by the electricity and gas system operators.

With regard to Section 4 in particular Electric Ireland supports all the proposals made and which we believe will contribute to greater clarity and understanding by stakeholders of all the, often complex, issues arising and decisions made.

We particularly commend proposed enhancements in the provision of feedback and would suggest additionally, for consideration, whether increased use of structured workshops, face-to-face meetings and / or phone or video conferencing would be of use. ? Specifically we believe that occasional use of such facilities between the submission of stakeholders responses and the issuing of decisions might be of use, to allow for discussions with stakeholders in relation to elements of their responses and / or for communication of UR 'minded to' positions and the rationale for such positions, in advance of the final position being published. It would be of further value if key supporting evidence for 'minded to' decisions was summarised and highlighted in such communication. It can sometimes be challenging to understand, in the published UR assessment of consultation responses, why particular evidence appears to be given greater or lesser weight in arriving at a particular conclusion. This is not to question in any way any of the decisions that have been made, which we believe strongly reflect fair and balanced consideration at all times by the Utility Regulator; rather it is proposed only as an extra means of helping stakeholders understanding of why a particular decision or part of a decision was made; and also as a way of alerting stakeholders where consequential process or system changes might be indicated in a proposed decision.

We look forward to your final views in this matter and anticipate real benefits for all involved in the consultation process.

Regards,

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