

## Respondent Details

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No.	Question	Your response	Consent to Publish Response (Y/N)
Q1	Do you see GSS and OSS as an effective tool in protecting consumers and ensuring good customer service? Please outline your reasoning.	The Consumer Council believes that GSS & OSS are absolutely essential tools to protect consumers and ensure good customer service. Consumers should receive the highest standard of service from their electricity provider and GSS/OSS ensures that challenging statutory performance targets are set. This provides consumers with the necessary protection when standards are not achieved and also acts as an incentive for the service provider to deliver an excellent service. The Consumer Council in partnership with NIE Networks and Utility Regulator produced a report in June 2016 "Empowering Consumers". This outlines real consumer expectations from the electricity network and can help inform any review. <a href="http://www.consumerCouncil.org.uk/filestore/documents/Empowering_Consumers_CEAP_report_FINAL.pdf">http://www.consumerCouncil.org.uk/filestore/documents/Empowering_Consumers_CEAP_report_FINAL.pdf</a>	Y
Q2	Do you have any comments on the fitness for purpose of the existing GSS/OSS regime in Northern Ireland? (a) Are there any areas in which consumer protection is lacking? (b) Are there any areas which you think are no longer needed?	The existing NI guaranteed standards for performance for originate from the Electricity (Standards of Performance) Regulations (Northern Ireland) 1993 and amended in 1999. In comparison Gas standards of performance in NI underwent a review in 2014 whilst in GB; Electricity standards of performance were reviewed in 2010 and 2015. It is therefore apparent the GSS/OSS for Electricity in NI requires a fitness for purpose review in line with these comparable sectors. (a) We believe consumer protection requires review the areas of timescales specified and subsequent payments due on default. We believe a review is required to determine if the timescales are fair and reasonable and whether in conjunction with the payment amount, consumer detriment is fairly recognised. It is also our view that any such payments deemed appropriate should be processed automatically and responsibility should not fall upon the affected consumer to make a claim. (b) We would be reluctant to outline any areas no longer needed in the absence of any supportive evidence such as the number of incidents reported and company performance levels.	Y
Q3	Do you think that a GSS regime similar to that implemented in GB by the Electricity (Standards of Performance) Regulations 2015 would be suitable for application in NI? (a) Are there any specific areas which would need to be amended to suit NI?	The Consumer Council believes the recent review of GSS implemented in GB has improved consumer protection. In particular we acknowledge amendments to timescales and a review of the payments for failure to adhere to these timescales. It is extremely inconvenient when consumers are without power and we believe the GB review of GSS timescales and payment amounts recognises this inconvenience and also acts as an incentive to the network provider. We also support the automatic payments to consumers affected without the necessity to formally submit a claim. (a) The Consumer Council is unaware of any areas that require amendment to suit NI, however we welcome the evidenced views of network providers to provide a balanced view.	Y
Q4	Do you think that a GSS regime for connections similar to that implemented in GB by the Electricity (Connections Standards of Performance) Regulations 2015 is suitable for application in NI? (a) Are there any specific areas which need to be amended to suit NI?	The Consumer Council believes there is merit in replicating a regime in NI for connections similar to that implemented in GB. Through our complaints handling experience, we have anecdotal evidence that consumers experience frustrations with both information and timescales during the connections process. This includes delays to works, changes to quotes for works and difficulties contacting key liaisons . We would therefore welcome clear and concise guidance that provides consumers with reassurance and protection but also incentivises the network operator to provide excellent customer service. (a) We would welcome views of network providers to inform how the implementation of connections standards would impact upon them and the relevance of conditions being practiced in GB.	Y
Q5	What is the impact of <u>not</u> updating the GSS regime in NI? (a) for consumers (b) for businesses?	The existing NI guaranteed standards for performance originate from the Electricity (Standards of Performance) Regulations (Northern Ireland) 1993 and amended in 1999. We believe that review is required in line with a best practice approach. The GB review was heavily influenced by experience and learning obtained following storms in December 2013. The Consumer Council would draw comparisons to the NI snow storms in March 2013. This impacted significantly on both domestic and business consumers and we believe the detriment and inconvenience they experienced should similarly inform any NI review of GSS.	Y
Q6	What is the impact of updating the GSS regime in NI to align with GB? (a) for consumers (b) for businesses	Updating GSS in NI to align with GB should provide domestic and business consumers with improved protection, specifically in relation to current timescales and payments amounts. Furthermore updating GSS to align with GB will incentivise the network provider to minimise the impact of power cuts, whilst making default payments will raise consumer awareness of standards of service and eradicate the barrier of burdensome claims submissions. The UR GSS review should also consider the consumer impact, detriment and dissatisfaction resulting from the removal of the planning permission prerequisite to obtain an electricity connection. The review should consider how GSS can help improve customer service and consumer satisfaction around electricity connections.	Y

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Q7	Are GSS of equal relevance and value to all network customer groups, including domestic, SMEs, large businesses, demand customers and generation customers? (a) If the answer is no, to which groups are they of more/less relevance to?	The Consumer Council has a statutory duty to protect the interests of all consumers, with a particular emphasis on vulnerable consumers. In our complaints handling role we know through firsthand experience the impact incidents such as unplanned power cuts have upon both business and domestic consumers. Business customers are often unable to continue trading or must source alternative means such as generators at considerable expense. Domestic consumers must manage difficult household conditions such as no lighting, cooking or heating which is often required for children or other dependants. We believe a review of GSS should consider relevance and value to all network customer groups and achieve a balance that adequately reflects all detriment or inconvenience incurred.	Y
Q8	Are the current levels of compensation under the GSS regime in NI still appropriate? (a) if no, to what extent should they be changed?	The review of GSS in GB that implemented many changes to timescales and payment amounts suggests that the regime in NI requires review. We would welcome consideration of GB modelling, such as real consumer experiences from events such as the snow storms in March 2013 and advancements since 1993 which enable the network provider to operate more efficiently now than when the current GSS was implemented. The Consumer Council also notes the increase in payment values to reflect inflation, for both performance and connections standards. We would welcome consideration of inflation values in any review.	Y
Q9	Should there be any difference in compensation for the different customer groups? (Domestic, SMEs and large businesses)	We believe there is merit in reviewing compensation levels between customer groups. Business customers for example will strongly argue that a power cut costs them considerable financial detriment, whereas consumers and particularly those who are vulnerable will experience inconvenience and hardship. We believe it is important to achieve a fair and reflective balance. In 2015 the Consumer Council commissioned Ipose Mori to conduct research on consumer's views regarding energy issues including "Compensation in instances of power outages". We believe these views should be given consideration. <a href="http://www.consumerCouncil.org.uk/filestore/documents/2015_Consumer_Energy_Research_Findings_Summary.pdf">http://www.consumerCouncil.org.uk/filestore/documents/2015_Consumer_Energy_Research_Findings_Summary.pdf</a>	Y
Q10	Is there sufficient consumer awareness of the GSS mechanism? (a) if no, how could this be improved?	It is difficult to analyse if there is sufficient consumer awareness of the GSS mechanism. We are aware that GSS is promoted through the network distribution company as well as organisations such as the Utility Regulator and the Consumer Council. However, we are uncertain that awareness of GSS is known to all consumers actually impacted by incidents covered by the regime. (a) We believe that the necessity for consumer awareness is lessened if automatic payments are introduced.	Y
Q11	What is the best way for a company to demonstrate that it meets or exceeds the defined GSS?	The Consumer Council believes that the Utility Regulator is best placed to ensure the company demonstrates that it meets or exceeds defined GSS. This information can be gleaned through the rigorous REMM reporting that is currently shared or a mandatory licence condition could be applied to ensure information is shared.	Y
Q12	Should company results on performance under the GSS regime be made public? Please outline your reasoning.	The Consumer Council's view is that where feasible, information should be made publically available. As such we fully support the sharing of performance results and believe this transparency will provide reassurance to consumers and incentivise the company to achieve high level targets. Furthermore, with the potential alignment with GSS in GB, comparative benchmarking could occur.	Y
Q13	Do you foresee any potential barriers to introducing a new GSS regime, or any future developments within the NI regulatory scene which may have an impact on the new regime?	In respect of barriers, we believe the network operator is best placed to comment, however we would envisage barriers arising such as the potential cost impact. The Consumer Council is not best placed to evidence future regulatory developments that may have an impact on the GSS regime. Consumer protection is at the heart of the Consumer Council's work and our focus remains on ensuring fair levels of protection exist for NI consumers, irrespective of potential barriers.	Y
Q14	Should the electricity arrangements for GSS in NI mirror the NI gas GSS arrangements (covering both gas network companies and suppliers), or be aimed at network companies only? Please outline your reasoning.	In our complaints handling role that covers the areas of energy, transport, water and sewerage and postal services, our most common query received year on year is regarding electricity bills. Whereas gas consumers are protected by GSS in respect of responding to complaints promptly, efficient handling of bill queries and payment issues, electricity consumers do not have the same protection. We therefore believe there is merit in considering the inclusion of GSS standards for electricity that mirror gas arrangements.	Y

**Additional Factors- Please complete this section if you consider there are additional issues/ aspects which the UR should consider as part of its review of GSS. Please use one row for each area and use additional rows as required.**

No.	Question	Your response	Consent to Publish Response (Y/N)
No.	Additional factor area	Reason for consideration and relevant factors	Consent to Publish Response (Y/N)
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