



**Response to the Utility Regulator Review of Electricity
Distribution and Transmission Connections Policy –
Consultation on next steps**

May 2017

1 Introduction

- 1.1 The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (NI) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland (NI).
- 1.2 The Consumer Council welcomes the opportunity to respond to the Utility Regulator (UR) Consultation on the next steps of the Review of Electricity Distribution and Transmission Connections Policy.

2 Issues and next steps

Connections network management

- 2.1 We support the UR's approach that any issues around network capacity that may require investment will be assessed and decided upon through the RP6 price control. The RP6 draft determination sets out £200m of estimated investment not included in NIE Networks RP6 Business Plan. We echo UR's call on SONI to provide further transparency about investment decisions that will have a material impact on consumers' electricity bills.
- 2.2 We support the UR request that NIE Networks considers incidences of under-utilisation of network capacity. We ask UR and NIE Networks to update industry and consumers about this, and share any proposals that may be deemed appropriate.
- 2.3 We note UR's decision to retain the current connections charging framework. Given that deeper network investment is allowed currently on a voluntary basis, and in the absence of conclusive evidence or analysis about the impact of deeper charges, this seems the sensible decision. We believe the ability to

pay a premium to get connected should be promoted by NIE Networks and SONI.

Connections process and queue

2.4 With regards to the queue, we made reference in our response to the UR Call for Evidence about “consumers who invested significant sums of money in small renewable generation equipment and are still waiting for a connection.” We ask UR to consider whether as part of this consultation, NIE Networks could give priority to the domestic small scale generators that have already purchased the renewable equipment.

2.5 We note UR’s “request that NIE Networks and SONI ensure that a robust process is in place for considering applications beyond Phase 1”. The implication is that the current process is not robust. We suggest that either UR is more prescriptive in the changes needed, or that NIE Networks and SONI are required to engage with consumers or undertake research to inform the necessary changes. UR should also set a deadline for implementing the changes.

Customer service, engagement and transparency

2.6 The Consumer Council welcomes UR’s proposals to increase the transparency of connection prices. In particular, we support the introduction of a Quotation Accuracy Scheme (QAS) that would provide electricity consumers here with the same level of protection of gas consumers in NI and electricity consumers in GB. We note the requirement to amend the Guaranteed Standards of Service regulations, but this shouldn’t be used as an impediment to introduce these consumer focused improvements.

2.7 We are supportive also of UR's proposal to increase and improve the information that NIE Networks and SONI offer to consumers. This was one of our key asks in the Call for Evidence.

2.8 We agree that the information provision should be flexible and adapt to new types of connection; we suggest that this flexibility encompasses also different types of consumers. For example, the information needs and resources of individual domestic consumers or farmers are significantly different than for large scale generation companies. We ask UR to consider this point.

3 Extension and connection offer requirements

3.1 We support in principle UR's proposed requirements for requesting and granting an extension for connections.

3.2 The process outlined is consumer focused. It sets clear timelines, information requirements and defined roles and responsibilities. This process should provide much needed clarity to consumers requesting a connection in the future.

3.3 NIE Networks and SONI's ability to refuse provision of connection offers is, although a legal right, an area of dissatisfaction for consumers. Therefore we would support the UR if it decides to introduce consumer supporting measures such as the requirement for an economic test.

3.4 We acknowledge the need to introduce licence changes or additions to NIE Networks and SONI licences to ensure consistency, compliance with the Order and to clarify the companies' legal obligations. We will assess the proposed changes when UR consults on the modifications.

4 Conclusion

- 4.1 The Consumer Council welcomes the steps UR has put forward as part of its review of the electricity connection policy. We wish to reiterate our commitment to continue working with the UR, the electricity retail industry and wider stakeholders to help improve the electricity connections process for consumers in NI.

If you require further information or you wish to discuss any aspect of this response please contact Paulino Garcia on 02890 251645 or Paulino.Garcia@consumercouncil.org.uk.



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