

Consultation Questions – Electric Ireland Responses

1. Do you agree with the four strategic objectives in the Consumer Protection Strategy?

- Yes, Electric Ireland agree with the recommendations in the Utility Regulator's Consumer Protection Strategy Consultation.

2. Are there any additional objectives which should be included in the Strategy?

- Electric Ireland broadly agrees with the objectives as set out in the Strategy document. However we would encourage the regulator to consider carefully customer communications objectives and how they can best be delivered to customers for maximum understanding and impact. Specifically we believe that communications which focus on key messages rather than detailed information packs may be of greater benefit to customers who wish to avail of the benefits of the energy markets in Northern Ireland. For those customers who wish to read additional detail suppliers can also provide access through websites etc.

3. Do you agree that the activities and outputs identified under each of the objectives are the right ones?

- Yes we agree the activities and the outputs of the strategy are well focused and achievable.
- Electric Ireland would also welcome additional clarity in relation to how the activities and outputs can support increased levels of competition to achieve reduced dominance in the residential electricity markets; and would welcome a timeline and activities, with interim targets, to deliver such an outcome in the period under review. We believe that a positive outcome will contribute strongly to affordability for customers.

4. Are there any additional projects or areas of work which should be included in the Strategy?

- Electric Ireland would welcome a project to establish a timeline and interim targets to achieve deregulation of the residential electricity sector within the term covered by this strategy.

5. What do you think should be the top three priority projects for the Consumer Protection Strategy? (Please also provide supporting reasons).

1. To develop a Code of Practice on energy theft – this area is increasing in scale and is a growing burden on all customers who have to pay for energy consumed but not paid for by customers who steal electricity.

2. Work with suppliers on debt communication – Electric Ireland believes that encouraging early and proactive customer engagement in relation to debt (or emerging debt problems) is essential to best outcomes for both customers and suppliers alike.
3. Increase tariff transparency – customers value information on prices which they can easily access, understand and compare without too much difficulty or inconvenience. Electric Ireland believes simple pricing options will best engage customers in the energy market.

6. Is there anything else you would like to add in relation to the Consumer Protection Strategy?

The strategy consultation is well focussed and incorporates realistic deliverables (albeit we have suggested an additional item above for consideration in relation to deregulation of the residential electricity market). We will be able to comment in more detail as the individual projects progress.

7. Do you agree that where this consultation has an impact on the groups listed above, those impacts are likely to be positive in relation to equality of opportunity for energy and water consumers?

- Yes, the proposals, where implemented, will further improve options for all customer to engage positively with the energy market.

8. Do you consider that the proposals need to be refined in any way to meet the equality provisions? If so, why and how? Please provide supporting information and evidence.

- The proposals are necessarily at a high level at this stage and, in that context, Electric Ireland believes they fully encompass equality provisions.
- Electric Ireland welcomes in particular the Regulators continued focus on vulnerable customers and the importance of the Customer Care Register.