



Response by Energia to Utility Regulator Consultation

Backbilling in the NI Retail Energy Market

Date 14th February 2019

1. Introduction

Energia welcomes this opportunity to respond to the Utility Regulator consultation on Backbilling in the NI Retail Energy Market. The majority of instances of backbilling are caused by incorrect or missing meter reads. Yet, Rather than try to address the underlying cause the UR are proposing to make suppliers foot the bill for what is ostensibly a problem with NIEN reads.

This response offers some general comments on the Utility Regulator proposal.

General Comments

Instances of backbilling are nearly exclusively caused by problems with NIEN meter reads. Of the five backbilling case studies presented in the consultation all of them were caused by missing or erroneous NIEN reads. These are not isolated cases, as outlined in the paper NIEN are also repeatedly missing their meter read SLAs. The UR is seemingly unwilling to tackle the cause of the issue, inconsistent NIEN reads, and instead they are choosing to allow the problem to persist but make suppliers cover the cost. This unbalanced approach is compounded by the fact that there will be no 13 month limit applied to network charges and suppliers will be expected to pay these in full.

The UR cites Ofgem's approach to Backbilling while exploring existing backbilling arrangements. When using GB as an example it is important to note that Suppliers in GB are responsible for meter reads and therefore have greater responsibility for backbilling issues. Conversely, suppliers in Northern Ireland are not responsible for reading meters and are therefore not responsible for the majority of backbilling issues.