

Respondent Details

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No.	Question	Your response
Q1	Do you see GSS and OSS as an effective tool in protecting consumers and ensuring good customer service? Please outline your reasoning.	Yes, this is standard regulatory practice. It is important that the standards strike a balance between cost of delivery and customers' willingness to pay.
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?	Stakeholder engagement carried out as part of the RP6 business plan indicated that customers were broadly happy with the existing levels of customer service. The RP6 plan includes targets of 95% of customers within 3 hours by the end of RP6 (currently an 87% standard) and 100% of customers within 18 hours (currently a 24 hour standard). The majority of standards in NI are equivalent, or broadly equivalent. Differences relate to the length of time allowed to restore supplies after a fault (during normal weather conditions and during severe weather conditions), and to a requirement to offer 2-hour appointment windows (instead of AM or PM).
Q3	Do you think that a regime for connections similar to that implemented in GB by the Electricity (Connections 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?	Competition in the market for new connections is the best way to ensure customers receive good and efficient service. NIE Networks is currently in the process of opening up the market fully and has successfully opened the market for distribution connections >5MW at the end of May 2016. Our key focus for 2017 is to deliver a business transformation programme to open the market for distribution connections. This is a major programme of work, and significant changes are being made to our IT systems to accommodate a contestable market. However these changes do not include those which would be required to implement / monitor connection standards as applicable in GB. Furthermore some of the GB connections standards are targeted at contestable works; so the market needs to be opened fully before such standards can be applicable in NI.
Q4	Do you think that a GSS regime 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?	As noted above, the majority of standards in NI are equivalent, or broadly equivalent, to the standards in GB. The main differences relate to the length of time allowed to restore supplies after a fault, and to a requirement to offer 2-hour appointment windows (instead of AM or PM). These differences are a result of historical investments made by the GB DNOs and funded by the GB customer. NIE Networks' business plan for RP6 has been prepared based on the existing standards. The appropriate time to consider changes would be at the beginning of RP7 so that these could be taken into consideration in the business plan.
Q5	What is the impact of <u>not</u> updating the GSS regime in NI? (a) for consumers (b) for businesses?	As noted above, stakeholder engagement carried out as part of the RP6 business plan indicated that customers were broadly happy with the existing levels of customer service. The RP6 plan includes targets of 95% of customers within 3 hours by the end of RP6 (currently an 87% standard) and 100% of customers within 18 hours (currently a 24 hour standard). The majority of standards in NI are equivalent, or broadly equivalent, to the standards in GB. The main differences relate to the length of time allowed to restore supplies after a fault, and to a requirement to offer 2-hour appointment windows (instead of AM or PM).

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Q6	<p>What is the impact of updating the GSS regime in NI to align with GB?</p> <p>(a) for consumers (b) for businesses</p>	<p>The main differences relate to the length of time allowed to restore supplies after a fault, and to a requirement to offer 2-hour appointment windows (instead of AM or PM). NIE Networks spent for RP6, based on the existing standards. If a new regime is to be introduced during RP6, we would need to revisit our plan.</p> <p>Supply restoration</p> <p>The GB standard is to restore supplies within 12 hours under normal weather conditions. When the fault is caused by severe weather, and depending on the severity of the weather, supplies are restored within 12 hours or a time period determined by a formula. If the GB standard was imposed in NI, it would have a significant impact on NIE Networks. Over the last two price control periods, the GB DNOs spent around £1.1bn to invest in improving network performance. In comparison, no such funding has been provided historically in NI. By way of comparison, on a per customer basis, the £1.1bn figure represents a significant amount of funding in NI.</p> <p>In addition, the GB standard of 12 hours restoration has been introduced incrementally. The standard was set at 24 hours in 1993, later amended to 18 hours in 2000, and then amended to 12 hours in 2013. Prior to these changes being made, for example, Ofgem confirmed in its Strategy Decision document for RIIO-ED1 published in March 2013, that the restoration standard would reduce from the start of ED1. ED1 did not take effect until April 2015, so the DNOs had time to plan and prepare to meet a tighter standard, and to include any necessary works and/or operational changes in their business plans for ED1. By contrast, we have had no such opportunity to consider changes to standards as part of our business plan development, given our plan was submitted in June 2016. See our Call for Evidence for the GSS review.</p> <p>NIE Networks also faces an issue regarding the small size of overhead line conductor which is more prone to damage during bad weather. (See chapter 8 of the RP6 business plan.)</p> <p>2-hour appointment window</p>
Q7	<p>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?</p>	<p>Service is important to all customer groups. See chapter 6 of the RP6 business plan.</p>
Q8	<p>Are the current levels of compensation under the GSS regime in NI still appropriate? (a) if no, to what extent should they be changed?</p>	<p>Excluding the restoration of supply standard, the levels of compensation in NI are comparable to those in GB. (Note comments above in answer to Q6 regarding restoration of supplies.)</p>
Q9	<p>Should there be any difference in compensation for the different customer groups? (Domestic, SMEs and large businesses)</p>	<p>The differentials under the current GSS are reasonable and comparable with GB.</p>
Q10	<p>Is there sufficient consumer awareness of the GSS mechanism? (a) if no, how could this be improved?</p>	<p>Our GSS are set out clearly on our website, including information on how customers can claim compensation.</p>
Q11	<p>What is the best way for a company to demonstrate that it meets or exceeds the defined GSS?</p>	<p>Through annual reporting on performance to the UR.</p>
Q12	<p>Should company results on performance under the GSS regime be made public? Please outline your reasoning.</p>	<p>We have no objection to this information being published.</p>

No.	Question	Your response
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?	The timing of the UR's review is problematic because we developed our plan for RP6 with regard to the existing GSS regime. There was no mention in the UR's Approach Document to RP6 or what it might have on RP6. In addition to the points we make earlier in Q6, we would stress that the UR must consider carefully the timing of this review of the GSS regime. If UR has intentions to amend the regime and GB, then it must set a glide path which is commensurate with the timetable afforded to the DNOs to improve network resilience and performance. We suggest a glide path which spans RP6 and RP7.
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.	The standards should be tailored to meet the specific requirements of the business being regulated.

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 all available space.

No.	Additional factor area	Reason for consideration and relevant factors
1		
2		
3		
4		

No.	Question	Your response
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6		