

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.	Yes, we believe that GSS and OSS are useful tools, however, we feel that much more is required to promote knowledge and understanding of the GSS and OSS. We also believe that a review of the GSS and OSS is well overdue.	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?	As outlined above, we believe that these tools need reviewing and brought into line with GB. We also believe that as with Gas, the GSS and OSS should apply to both the networks and suppliers. This would improve the customer journey greatly and ensure smooth communications and speedy resolution.	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?	Yes. We also believe that the enhanced payments and extension to timeframes for making claims from the companies is crucial for NI. We also believe that where a company makes a goodwill gesture rather than pay out under GSS, that these should also be monitored and published.	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?	Yes, we believe that a GSS regime for connections should be similar to that introduced in GB.	Y
Q5	What is the impact of <u>not</u> updating the GSS regime in NI? (a) for consumers (b) for businesses?	There will be a negative impact for consumers.	Y
Q6	What is the impact of updating the GSS regime in NI to align with GB? (a) for consumers (b) for businesses	Provides for better and enhanced protection for consumers. Drives performance standards within the companies.	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?	Yes, however the relevance is much less known amongst vulnerable groups.	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?	No, the current levels of compensation should be harmonised to reflect the GB compensation.	Y
Q9	Should there be any difference in compensation for the different customer groups? (Domestic, SMEs and large businesses)	The particular needs of very vulnerable households should be taken into consideration as any impact on them may be greater and graver. Could critical care and customer care registers assist in identification of these households?	Y
Q10	Is there sufficient consumer awareness of the GSS mechanism? (a) if no, how could this be improved?	No there is not sufficient consumer awareness. There should be an awareness campaign undertaken which should include, individuals and trusted intermediaries, CCNI, NEA and the broader advice sector.	Y
Q11	What is the best way for a company to demonstrate that it meets or exceeds the defined GSS?	This information could be placed on their website and used by the company to highlight high performance. The NIAUR could also publish this on their website and benchmark performance with other companies across GB.	Y
Q12	Should company results on performance under the GSS regime be made public? Please outline your reasoning.	Yes, we believe that this information should be open and transparent. Goodwill gestures should also be recorded. A clear understanding of when and how exceptions are defined and understood should also be clear and transparent. Companies and individuals should be clear about when GSS should be implemented. Companies should also clearly advertise and promote this.	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?	We know of no reason why there should exist barriers to improve GSS and OSS as was the case in GB. The proposed enhancement, are just that and should have no impact on issues such as additional IT. Openness, transparency and increases to default payments should all act as drivers to improve service performance and reliability.	Y

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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.	Yes, we believe this is fair and will enhance the customer journey.	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.	Additional factor area	Reason for consideration and relevant factors	Consent to Publish Response (Y/N)
1			
2			
3			

No.	Question	Your response	Consent to Publish Response (Y/N)
4			
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6			