



Northern Ireland Water Response to the Consultation paper on:

“Electricity Customers with Multiple Premises in the Non Domestic Market.” 23rd Nov 2012

In response to the above consultation NIW (Northern Ireland Water) would make the following comments to the questions posed in the consultation paper.

Q1. From NIW perspective there is a discernible difference for the purposes of procuring competitive electricity supply between a customer with multiple premises and a customer with single premises that both consume above the unregulated threshold. In our situation we have numerous sites of various levels of consumption. Many of these sites are below the threshold of 150MWhrs but are scheduled together with many other sites of higher consumption for procurement purposes. Unless sites below 150MWhrs are separated into a separate schedule then it becomes unrealistic for Power NI to compete for that schedule as they are tied to the regulated tariffs for a large portion. It is unrealistic for NIW as a company to further divide up the load to facilitate one supplier within the Single Energy Market and thus risk obtaining a less commercially attractive result. In essence for a company like NIW, by allowing the aggregate of small less than 150MWhr sites to be considered, all suppliers are able to compete on a level playing field with no detriment to the value for money gained by the procurement exercise.

Q2. NIW does agree that customers with multiple premises that in aggregate consume more than 150MWhr should have the option to avail of either the non-regulated offering for all sites in aggregate or price regulated offering for each site (MPRN). This current threshold has the effect of limiting the ability of Power NI providing a company like ourselves a competitive price for what might be in aggregate a load in GWhrs, thus removing Power NI from the competition. Allowing the aggregate of our sites to be considered for tender purposes should allow Power NI to put together a competitive package that allows them to remain in the competition for that element of our business.

Q3. Having considered the requirements and limitation we believe that these are reasonable and practicable.

Q4. NIW have no other comments to make on this consultation

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18/12/2012