

EMAIL RESPONSE TO THE CONSULTATION ON “ELECTRICITY CUSTOMERS WITH MULTIPLE PREMISES IN THE NON-DOMESTIC MARKET”

RESPONDENT: NEWRY & MOURNE DC

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Robert,

My comments on the stated questions can be found below

Q1. Are there any discernible differences, for the purposes of procuring a competitive electricity supply, between a Customer with multiple premises and a Customer with single premises that both consume above the unregulated threshold? If you believe there are differences please provide the rationale for each identified variation.

Yes, currently I tender for all NI Local Authorities and any simplification of the process would be welcomed, plus will make adjudication easier and therefore less risky. This in turn usually increases competition.

Only problem is that if multiple sites are aggregated the admin costs for managing the supply of multiple sites will be higher than a single site for POWER NI and therefore this cost may be required to be separated, otherwise a single site will include the added cost of admin, which it should be excluded from. If tendering for only one aggregated group of sites, fine, but we will be tendering for a multitude, although if each group or single 150mwh pa sites is a different lot then fine as it can be factored in as required.

Q2. Do you agree that Customers with multiple premises, that in aggregate consume 150MWh or more per annum, should have the option to avail of either a non-price regulated supply offering for all sites or a price regulated tariff from Power NI for each MPRN consuming less than 150MWh per annum? If not, please explain your rationale.

Agree, and increased options increase competition, normally as long as the options are limited in number. i.e. a myriad of options could make a tendering process untenable

Q3. Do you agree with the requirements and limitations, as set out in 3.5.1 to 3.5.5, which the UR considers must be satisfied in order for Power NI to offer a non-price regulated supply offering to Group Customers? If not, please explain what you believe the requirements and limitations should be.

I agree, especially as there is basically an opt out in 3.5.5.

Q4. Are there any other issues specific to this consultation about Group Customers that have not been considered by the UR in this document?

None that come to mind, from my perspective.