



Robert Stewart
Utility Regulator
Queens House
14 Queen Street
Belfast
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RE: Consultation on regulatory treatment of non-domestic electricity customers with multiple premises.

Power 2 Business are electricity procurement consultants who act on behalf of our commercial clients in Northern Ireland by tendering for their electricity supplies and reviewing suppliers offers.

We welcome the opportunity to respond to Unireg's consultation paper on the regulatory treatment of non-domestic electricity customers with multiple premises.

On the whole we would welcome any changes in the Northern Ireland Electricity market which would create increased competition between suppliers in the commercial sector. We have many clients with aggregate consumption of more than 150 MWh per annum and have had to exclude Power NI from the tendering process as they could not offer a competitive price relative to other suppliers for all sites,

Response to Question 1

Other than receiving multiple bills we believe there is no discernible difference between a customer with multiple premises and a customer with a single premises that both consume above the unregulated threshold

Response to Question 2

Completely agree.

Response to Question 3

We agree with the requirements and limitations other than 3.5.2 regarding the "owned and leased by a single legal entity". We believe this term may still eliminate Power NI from tendering for different companies / charities using collective purchasing, such as "affiliation deals" which are common amongst suppliers currently. We would suggest the requirements and limitations for section 3.5.2 should state "The group of premises must be owned or leased by a single legal



entity or shown to be part of a collective purchasing scheme or affiliate”

Response to Question 4

As discussed in question 3 we believe that having another supplier whom can offer be-spoke pricing for businesses / charities that collectively purchase their supplies would increase the competitive offers they receive.

Again we would like to thank Unireg for the opportunity to respond to the consultation paper and if any further information is required on our response would welcome such a request.

Kindest Regards,

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