

**Respondent Details**

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No.	Question	Your response	Consent to Publish Response (Y/N)
Q1	<p>Do you see GSS and OSS as an effective tool in protecting consumers and ensuring good customer service? Please outline your reasoning.</p>	<p>The GSS and OSS framework has become outdated and no longer reflects the prevailing electricity market arrangements.</p> <p>This coupled with a lack of reporting transparency makes the question posed by the UR difficult to answer and for this reason Power NI welcomes the URs refresh of such standards.</p> <p>Throughout the Call for Evidence the UR make repeated reference to Ofgem's regime. Power NI believes this is an unhelpful distraction in assessing the GSS and OSS in NI. The NI electricity market is significantly different with the 'common services' model providing important efficiencies and cost benefits to consumers. One negative aspect of the 'common services' model is that Suppliers have little real influence over the quality of the service provided by NIE Networks on their behalf. This is where the GSS and OSS have a vital role to play.</p>	Y
Q2	<p>Do you have any comments on the fitness for purpose of the existing GSS/OSS regime in Northern Ireland?</p> <p>(a) Are there any areas in which consumer protection is lacking?</p> <p>(b) Are there any areas which you think are no longer needed?</p>	<p>Power NI believes that the GSS/OSS regime should be re-focussed on providing customer protections and enhanced service via the 'common services' model.</p> <p>At present there is little reporting or transparency in relation to NIE Networks performance against the GSS/OSS and no opportunity for suppliers to input into or change the setting of standards. Suppliers have the most interaction with customers and any perception of poor service by NIE Networks is reflected on the supplier. It is crucial that the UR implement a process which facilitates scrutiny and review.</p> <p>It is also important to recognise that the UR has already significantly increased the Consumer Protection measures which Suppliers must provide via the work completed on Codes of Practice.</p> <p>The OSS and GSS regime offer an opportunity to define how NIE Network's provide network related services to customers both in terms of general reliability and quality as well as services requested via the customers supplier.</p> <p>To that end, the GSS which relates to queries regarding your bill and standards payments should be amended to standards payments only as NIE Networks do not typically bill customers unless the UR is referring to connection charges in which case that should be made clearer.</p>	Y
Q3	<p>Do you think that a regime for connections similar to that implemented in GB by the Electricity (Standards of Performance) Regulations 2015 would be suitable for application in NI?</p> <p>(a) Are there any specific areas which would need to be amended to suit NI?</p>	n/a	Y

No.	Question	Your response	Consent to Publish Response (Y/N)
Q4	<p>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?</p> <p>(a) Are there any specific areas which need to be amended to suit NI?</p>	<p>As stated above, The NI electricity market is significantly different to the GB model. The 'common services' model provided important efficiencies and cost benefits to consumers. One negative aspect of the 'common services' model however is that Suppliers have little real influence over the quality of the service provided by NIE Networks on their behalf. This is where the GSS and OSS have a vital role to play.</p> <p>Many of the standards in relation to security of supply and restoration are applicable in both markets however additional standards placed on NIE Networks, especially in relation to appointments and meter reading are appropriate in the NI context.</p>	Y
Q5	<p>What is the impact of <u>not</u> updating the GSS regime in NI?</p> <p>(a) for consumers (b) for businesses?</p>	<p>Power NI would welcome an enhanced focus on meter reading for both domestic and commercial customers in the NI context. Suppliers rely upon, and pay NIE Networks to provide accurate readings and this function is critical in ensuring that the end consumer billing is as accurate as possible.</p>	Y
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>Power NI would again urge the UR not to simply follow or not follow the GB model but rather take from the GB model what is appropriate for NI and amend the GSS/OSS framework to reflect the 'common services' model which is a successful element of the NI electricity market.</p>	Y
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>The GSS/OSS framework is relevant to all electricity users.</p>	Y
Q8	<p>Are the current levels of compensation under the GSS regime in NI still appropriate?</p> <p>(a) if no, to what extent should they be changed?</p>	<p>Power NI has undertaken no customer research in relation to this point therefore has no evidence on which to base an answer.</p>	Y
Q9	<p>Should there be any difference in compensation for the different customer groups? (Domestic, SMEs and large businesses)</p>	<p>Power NI has undertaken no customer research in relation to this point therefore has no evidence on which to base an answer.</p>	Y
Q10	<p>Is there sufficient consumer awareness of the GSS mechanism?</p> <p>(a) if no, how could this be improved?</p>	<p>Power NI has undertaken no customer research in relation to this point therefore has no evidence on which to base an answer.</p>	Y

No.	Question	Your response	Consent to Publish Response (Y/N)
Q11	What is the best way for a company to demonstrate that it meets or exceeds the defined GSS?	Power NI would welcome an enhanced reporting framework in this area. Perhaps utilising the REMM Framework.	Y
Q12	Should company results on performance under the GSS regime be made public? Please outline your reasoning.	Power NI would welcome an enhanced reporting framework in this area. Perhaps utilising the REMM Framework.	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?	n/a	Y
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 gas and electricity markets in NI are different and the GSS/OSS framework should reflect the differences.	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	Overarching principle	<p>The 'common services' model in the NI electricity market is an important design aspect which provides tangible cost efficiencies for end consumers. This design differs from both the GB and NI gas markets. Power NI strongly believes that the GSS/OSS framework should be tailored and positioned as standards expected from NIE Networks in terms of network reliability, restoration and services provided on behalf of suppliers. Supplier standards are incorporated into the existing Codes of Practice.</p> <p>Providing this clear demarcation the UR would provide clarity on the goals of the OSS/GSS framework. The framework should also be enhanced by greater reporting transparency and a documented amendment procedure through which suppliers could propose changes for consideration by the UR.</p>	Y

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