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Ursula Trolan
Utility Regulator
Queens House
14 Queen Street
Belfast BT1 6ED

2 April 2015

Dear Ursula

Consultation on Implementation of the Retail Energy Market Monitoring (REMM) Framework

NIE welcomes the opportunity to respond to the Utility Regulator's (UR) consultation on the above. Our comments are as follow.

At section 5.6.1 Disconnections (page 78) NIE considers that the Reasons for Disconnection categories should be more clearly defined.

Revenue Protection activities within the electricity market refer to activities which are not related to non-payment activities but to third party interference with NIE equipment, generally associated with illegal abstraction of electricity. Where disconnections are required, these are mainly, but not exclusively, for health and safety reasons.

In addition, while NIE provides transactional services to suppliers to disconnect supplies for reasons of non-payment, in this regard NIE is acting solely as an agent for the supplier. To avoid potential confusion in understanding the reasons for disconnection, NIE would suggest that the approach should clearly distinguish between disconnections initiated by NIE in undertaking its obligations, and those initiated by suppliers (albeit some of these may be executed by NIE on behalf of suppliers). Disconnections initiated by NIE should be categorised as follows:

1. Disconnections initiated by NIE mainly due to health and safety reasons; and
2. Disconnections initiated by Suppliers due to all other reasons



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The proposed Reason for Disconnection categories to be provided by electricity suppliers should remain as stated and can be identified easily based on the categories provided above. Suppliers should include within their figures those disconnections they have requested NIE to undertake on their behalf.

During a meeting in September 2014, NIE provided the UR with information on required changes to market IT systems to enable the required reporting information to be provided. In particular, NIE will have a number of system changes to introduce in order to provide the data under the revised customer categories. At section 6 (page 108), the UR states that its aim is to produce a Decision Paper by the end of May 2015. NIE would advise that any significant delay in the publication of this Decision Paper will adversely impact on NIE's ability to implement the necessary IT system changes that are necessary to deliver the first cycle of test data by the end of November 2015.

I hope you find this response helpful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Carl Hashim', with a large, sweeping flourish underneath.

CARL HASHIM
Regulation Officer

L 150402 NIE's response to the REMM consultation