

Respondent Details

Company Name:	SSE Airtricity
Respondent Name:	Siobhan Melvin
Designation:	
Address:	SSE Airtricity Red Oak South, South County Business Park, Leopardstown, Dublin, D18 W688
Phone Number:	35316556446
Email Address:	siobhan.melvin@airtricity.com

No.	Question	Your response	Consent to Publish Response (Y/N)
Q1	Do you see GSS and OSS as an effective tool in protecting consumers and ensuring good customer service? Please outline your reasoning.	SSE Airtricity believes that GSS can be an effective tool in protecting customer and ensuring good customer service as they ensure that all customers receive a minimum standard of service.	
Q2	Do you have any comments on the fitness for purpose of the existing GSS/OSS regime in Northern Ireland? (a) Are there any areas in which consumer protection is lacking? (b) Are there any areas which you think are no longer needed?		
Q3	Do you think that a GSS regime similar to that implemented in GB by the Electricity (Standards of Performance) Regulations 2015 would be suitable for application in NI? (a) Are there any specific areas which would need to be amended to suit NI?	SSE Airtricity believes that many of the standards implemented in GB are already contained in the NI GSS with the exception of the severe weather categories for supply restoration. SSE Airtricity would support the introduction of standards similar to GB relating to severe weather conditions as we believe it would lead to a positive customer experience.	
Q4	Do you think that a GSS regime for connections similar to that implemented in GB by the Electricity (Connections Standards of Performance) Regulations 2015 is suitable for application in NI? (a) Are there any specific areas which need to be amended to suit NI?		
Q5	What is the impact of <u>not</u> updating the GSS regime in NI? (a) for consumers (b) for businesses?		

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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>SSE Airtricity believes that the key changes to GSS introduced in GB would have a positive impact on NI consumers & business. At the moment in NI customers may have to wait up to 24hrs for supply restoration following a power cut (normal weather conditions) compared to 12hrs in GB. We support the introduction of severe weather categories in NI similar to those in place in GB as we believe this will have a positive customer impact.</p>	
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>SSE Airtricity believes that certain GSS (e.g. those relating to planned & unplanned power outages/ faults) are not of equal value to all customer groups as the financial impact may be different. We believe each customer group should be assessed separately as the impact may be different. In the domestic sector customers critically dependent on electricity may require additional notice for a power outage to allow the customer make alternative arrangements. The UR should also consider the best format of communication with vulnerable customers as the current standard outage notification format may not be the most appropriate depending on the particular vulnerability the customer has.</p> <p>SSE Airtricity believes that particular customer groups such as large businesses and generation customers should also be treated differently especially in the area of power outages both planned & unplanned. We believe these groups should be given longer notification periods as alternative arrangements may need to be put in place. Likewise if adequate notice is not given then compensation payments scales with the size of connection for example. Depending on the customer type adequate financial arrangements must be put in place also for unplanned interruptions. Under decisions contained in SEM-15-071 generation sites receive compensation if a fault or planned outage occurs on the transmission network however it does not extend to the distribution network. It is our view that adequate compensation arrangements are required for faults/ outages on the distribution network also.</p>	
Q8	<p>Are the current levels of compensation under the GSS regime in NI still appropriate? (a) if no, to what extent should they be changed?</p>	<p>See response to Q7</p>	
Q9	<p>Should there be any difference in compensation for the different customer groups? (Domestic, SMEs and large businesses)</p>	<p>It is SSE Airtricity's view that, depending on the particular standard, different compensation levels may be required for different customer groups and should be aligned to the financial impact on that customer group e.g large businesses and generation sites may require more than 3 days notice of a power outage if the outage will result in a factory closure/ loss of output for example.</p>	

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Q10	Is there sufficient consumer awareness of the GSS mechanism? (a) if no, how could this be improved?		
Q11	What is the best way for a company to demonstrate that it meets or exceeds the defined GSS?	We believe that the most appropriate way for a network company to demonstrate adherence is by way of REMM reporting. SSE Airtricity also believes that network companies should also complete an annual retail licence compliance statement.	
Q12	Should company results on performance under the GSS regime be made public? Please outline your reasoning.		
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?		
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.	Electricity supply companies are dependent on NIE Networks on delivering meter reading & fieldwork activities and therefore we don't believe the GSS in should mirror the NI gas GSS arrangements. Many customer queries & complaints relate to meter reading & meter issues and therefore suppliers are dependent on NIEN responding to queries before suppliers in turn can provide a resolution to customer. Given that there are no SLAs in place for query resolution between NIEN & suppliers we don't believe suppliers can then be held to timescales where we may be relying on the network company to provide a response/ take action.	

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)

No.	Question	Your response	Consent to Publish Response (Y/N)
1			
2			
3			
4			
5			

No.	Question	Your response	Consent to Publish Response (Y/N)
6			