Response by Energia to Utility Regulator Consultation on Consumer Protection


12th June 2015
1. Introduction
Energia welcomes the opportunity to respond to this consultation on the Utility Regulator’s Consumer Protection Strategy 2015/16-2019/20. Energia places a great emphasis on customer protection, relations and engaging with customers. While the consultation here relates to the domestic market and we supply the Non-domestic sector, we would still like to take this opportunity to raise some points and to request further engagement on I-SEM.

General comments
Customer protection is a matter that Energia takes very seriously. However it is important to acknowledge that extra layers of complexity do not always equate to an improved customer experience and can potentially drive up costs. Given the differences between the customer sets in Domestic and non-domestic we would hope that changes implemented here would not inform practices in the Non-domestic sector.

Energia is heavily engaged in the I-SEM market design process and we understand its fundamental significance in the context of protecting NI consumers. We do not share the expectation expressed by UR that I-SEM will provide greater transparency and increased competition (5.2.12). Indeed we have well founded concerns that this will not be the case and would stress the need for the regulatory authorities to appropriately address market power and ensure market access across all wholesale market timeframes, including the forward market. Given the significance of this issue we will write separately to the UR to elaborate on these points and would welcome a meeting with the Retail Directorate to discuss further.