Northern Ireland Electricity Limited

IMPLEMENTATION OF THE EU THIRD INTERNAL ENERGY PACKAGE

Notification of proposed final decisions and accompanying licence modifications

NIE’s RESPONSE

3 May 2012
INTRODUCTION

Northern Ireland Electricity Limited (NIE) welcomes this opportunity to respond to the Utility Regulator's (UR) consultation paper. Our comments are as follows:

Draft Modifications to NIE’s licence

1. Condition 28

1.1 References to the TSO and SEMO

The references in this Condition (e.g. C28.2) to the “Transmission System Operator” and the “Northern Ireland Market Operator Licensee” require clarification. In particular, it is not apparent that the TSO/SEMO would require data specific to individual premises.

1.2 Condition 28.2 (c) (i)

We would request the following amendment to allow suppliers to access data using the keypad premise number, and to exclude the customer reference number which was allowable under the interim legacy arrangements:

“to any relevant licensed supplier who is registered as the supplier or who has been provided with the meter point registration number or keypad premise number or postal code and house number for the purposes…….”

1.3 Condition 28.2 (d)

The phrase “(or, where that number has not yet been created, the customer reference number)” should be deleted (this is a legacy arrangement only).

1.4 Condition 28.3 (g)

The Enduring Solution planned to be implemented in May 2012 does not include functionality to meet this requirement. NIE systems and processes will require to be changed.

2. Condition 44

2.1 Condition 44.2

This sets out new specific reporting arrangements which are not included in the Enduring Solution. This provision will require a change to NIE systems and processes. NIE welcomes the proposed consultation proposals in relation to compliance with this Condition.
Decision Paper

1. Paragraph 2.3.11

NIE welcomes the UR’s decision to consult with NIE before setting the date for compliance.

2. Paragraph 2.3.15

We note the UR’s proposal for a period of observation on switching processes and procedures before making further proposals on inclusion of these in the GSS. We would point out that the proposed reporting, as required under the new Condition 44, will not be in place at Enduring Solution go-live (1.4 above refers).

3 Paragraph 2.3.20

NIE has reported to the UR on the changes that are required to the MRC as a consequence of the Enduring Solution. NIE requested a response by 4 May 2012.

4 Paragraphs 2.3.21 and 2.4.15/18

We would point out that, whilst the Enduring Solution systems and processes, planned to be implemented in May 2012, include the 3 week switching period, changes which are required as a result of these proposals and, as already noted above, will be a direct cost associated with these proposals.