



Electric Ireland Response:

UR Draft Corporate Strategy 2019-2024

31st January 2019

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Electric Ireland welcomes the opportunity to respond to the UR's draft Corporate Strategy 2019-2024. The key points for Electric Ireland and our customers are discussed below. Consistent with all of our responses, Electric Ireland views these questions from the perspective of a standalone supplier and as a representative of the customer. It is encouraging to see the positive outcomes from the 2014-2019 Corporate Strategy and we hope that this subsequent Corporate Strategy can build on the progress to date.

Response to Consultation Questions

Q1. whether UR have taken account of key strategic issues and context in developing our draft strategy;

Yes, Electric Ireland notes that UR has taken account of the relevant key strategic issues and context in developing the draft strategy. While the strategic issues identified (energy transition, competitive markets, fairness and consumer outcomes, supporting renewables, new technologies etc.) will all play an important role in terms of customer outcomes, we believe it will be challenging to balance implementation in a manner which is cost effective for suppliers and which can satisfy increasingly demanding customer expectations. In this context, Electric Ireland has a keen interest in efficiently incurred costs and positive customer journey experiences, which we feel are not mutually exclusive and which can be achieved in mutually beneficial ways.

In this regard we have previously advocated for increased levels of principles based regulation rooted in optimum customer outcomes. Establishing prioritised consumer expectations / outcomes is critical and needs to be supported by robust research. Whilst we recognise that information is at the heart of customer choices Electric Ireland also believes that the information should be very concise and clear and that we need to avoid information overload, where customers avoid reading information because they don't have the time, it is too confusing and / or it is too difficult to read. We need to acknowledge that the average customer is well capable of making informed choices through the wide range of information sources available; and that the spend in relation to information provision is highly targeted, especially in relation to vulnerable customers.

Q2. Our proposed strategic objectives, key outcomes and success measures;

Electric Ireland support the three strategic objectives highlighted in the consultation:

1. Promoting markets that deliver effective competition, informed choice and fair outcomes
2. Enabling 21st century networks
3. Enabling security of supply and a low carbon future.

Electric Ireland request that where any increased regulatory burden is proposed that a demonstrable outcome will deliver an improved customer benefit (in the form of improved customer services outcomes, wider range of better priced products etc.) with due regard to implementation timelines / costs.

Consideration might also be given to mechanisms by which stakeholders can engage with UR around possible differences of interpretation, following decision and / or in planning for implementation.

Q 3. any other significant relevant issues or suggestions that we should be aware of in finalising our draft corporate strategy.

The scope of the draft corporate strategy appropriately covers the key issues that are likely to emerge in the relevant strategy period. We note also that potential implications of Brexit (and possible changes to other market arrangements) are referenced but are necessarily omitted from consideration at this point.