



Electric Ireland Response:

**Consultation on Consumer Protection Strategy
Review and Proposed New Consumer Protection
Programme commencing April 2019**

7th December 2018

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Respondent's Details

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Response to Consultation Questions

Q 1. Do respondents share the view of UR that the equality impacts of the proposed CPP are positive and therefore do not require a full screen? If yes, please provide details of any evidence you feel UR should consider

Yes, Electric Ireland share the view of UR that the equality impacts of the proposed CPP are positive and therefore do not require a full screen

Q 2. Do respondents agree with the proposal to expand the existing CPS Leadership objective to become Leadership and Engagement for the reasons set out in this paper?

Electric Ireland acknowledge and are supportive of UR's aim to expand the existing CPS Leadership objective to become Leadership and Engagement for the reasons set out in this paper. We have consistently argued for the development of policy positions which are rooted in engagement including solid customer research which will help to highlight and prioritise customer preferences. In this regard we particularly welcome UR's intention to focus on customer outcomes, particularly where research indicates material percentages of customers are in favour of identified key protection measures which will deliver the optimum benefit to the greatest numbers. It would be useful if "material" could be defined by for example setting appropriate thresholds above which priorities could be based. In this regard we would be aiming to ensure we target resources for best results.

Q 3. Are the projects included in tables 9, 10 and 11 the full list of projects that respondents want to see included in CPP? Do you agree with the proposed prioritisation of the projects listed?

Yes. Electric Ireland agrees that the projects included in tables 9, 10 and 11 are an appropriate list of projects for inclusion in CPP and we largely agree with the proposed prioritisation of the projects listed. In this regard we consider that it would be useful to conduct the review the GSS either in conjunction with or in advance of

backbilling review as there are dependencies from one to the other (in respect of the dependency on inputs from NIE Networks to successful Supplier billing). Whilst the identified projects undoubtedly would provide additional consumer protection some consideration should also be given to information overload and to consumers ability to absorb all of the information that we might wish to give them as against, possibly targeting key messaging for maximum consumer effect and best outcomes. Furthermore, we should be wary of infringing on the natural rights of vulnerable consumers, some of whom may have sensitivities about being separately identified for any special treatment.

Regarding the project to deliver “Retail Energy Market Monitoring: Consumer Insight Market Analysis to include both internal and external publication aspects.” And to “Deliver new published content to help educate/empower consumers and stakeholders about energy market and consumer outcomes” we request that due consideration continues to be given to issues of commercial sensitivity particularly and the use of aggregation of results across the industry as appropriate. In this regard we are assuming that a further consultation and/or engagement with industry participants will take place in advance of any proposed changes to the existing process.

Note, cognisance needs to be given to suppliers ability to facilitate delivery of any proposed changes in an efficient cost-effective manner whilst delivering on broader business objectives in a dynamic competitive retail energy market environment. It can often be very challenging for suppliers to comment on the cost impacts of proposed changes in advance of detailed proposals being approved. Trying to assess a cost impact based on a high level proposed policy position can be substantially different when work on a detailed specification is being developed which can also impact in a material way on timelines for delivery. In addition, while regulatory projects get the highest priority within the business there is a planning framework for resource allocation which applies. So for example we may get an approved decision on a particular consultation at the beginning, middle or towards the end of a planning cycle for a block of IT work, (which in our case tends to be in three month blocks). If the consultation decision is made towards the middle or end of a planning phase, it could be that it has not been included in an already agreed block of deliverables for the following three months. This can impact on delivery timelines and we would request that UR allow for flexibility, including further engagement with suppliers, in finalising a delivery schedule for IT work associated with any decision.

Q 4. Are respondents content with the projects contained in table 11 which are not currently prioritised within the 3 year timeframe of the CPP? And are respondents content that the need for and priority of these projects will be re-examined following year 3 of the CPP?

Electric Ireland agree with the exception highlighted in our previous answer on the interdependence between the GSS review and the proposed Backbilling project .

Q 5. Further to the previous consultation questions, do respondents have any general comments on the overall proposed CPP? Please provide evidence to support your answer.

Electric Ireland are supportive of the proposed CPP with comments as above.

One area which might benefit from further review is the consumer checklist where it is widely accepted that it is not fit for purpose and that consumers might appreciate a far more concise (preferably one page) document that would summarise their key entitlements with reference to where they could source additional information if they wished.