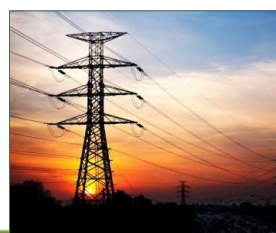


Electricity Guaranteed Standards of Service Consultation Paper

12th April 2017



About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive leads a management team of directors representing each of the key functional areas in the organisation: Corporate Affairs; Electricity; Gas; Retail and Social; and Water. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.

Our Mission

Value and sustainability in energy and water.

Our Vision

We will make a difference for consumers by listening, innovating and leading.

Our Values

Be a best practice regulator: transparent, consistent, proportional, accountable, and targeted.

Be a united team.

Be collaborative and co-operative.

Be professional.

Listen and explain.

Make a difference.

Act with integrity.

Abstract

The guaranteed standards of service (GSS) set out prescribed service levels which individual consumers can expect from electricity companies. They include compensation payment requirements where there has been a failure by the company to adhere to the standards (subject to certain exemptions). The guaranteed standards of performance were specified in Regulations made under Article 42 of the Electricity (NI) Order 1992 by the Director General of Electricity. The Electricity (Standards of Performance) Regulations Northern Ireland 1993 came into force on 1st January 1994. The regulations were subsequently amended by the Electricity (Standards of Performance) (Amendment No 3) Regulations (NI) 1999 and the current standards have been in place since 1st October 1999.

The current GSS regime requires review to ensure it is fit for purpose. This consultation invites stakeholder feedback on the Utility Regulator's proposed approach to introduce new GSS Regulations which will apply to both electricity distribution and supply companies.

Audience

Electricity network and supply companies, gas network and supply companies, electricity customers, consumer groups, electricity industry participants, statutory bodies and the wider stakeholder body.

Consumer impact

GSS set out the prescribed levels of service which consumers can expect. An effective GSS mechanism has the potential to benefit consumers by incentivising high quality customer service and ensuring that customers receive redress for inconvenience caused by failures of electricity network companies and electricity suppliers to meet the prescribed levels of service.

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Executive Summary

The guaranteed standards of service (GSS) set out prescribed service levels which individual consumers can expect from electricity companies. They include compensation payment requirements where there has been a failure by the company to adhere to the standards (subject to certain exemptions).

The guaranteed standards of performance were specified in Regulations made under Article 42 of the Electricity (NI) Order 1992 by the Director General of Electricity. The Electricity (Standards of Performance) Regulations Northern Ireland 1993 came into force on 1st January 1994. The Regulations were later amended by the Electricity (Standards of Performance) (Amendment No 3) Regulations (NI) 1999 and the current standards have been in place since 1st October 1999.

The Utility Regulator has identified a need to review the current Electricity Guaranteed Standards of Service framework. We are reviewing the guaranteed standards and overall standards of performance to ensure that they are fit for purpose, reflect consumer needs and do not create unnecessary burdens on business. The Utility Regulator issued a call for evidence¹ to stakeholders and interested parties on 24th November 2016 to help form a perspective on the relevant policy considerations and approach to take in the review.

This consultation paper is the second step in the process of reviewing the GSS regime. This paper takes into account the responses to the call for evidence and seeks further in depth feedback from stakeholders and interested parties on our proposed approach. The information obtained from this consultation will be used to inform our decision on the guaranteed standards and overall standards of performance. The proposed outcome of the review will be the introduction of new and updated regulations setting out the guaranteed standards of performance for both electricity supply and distribution companies.

The proposals for a new GSS regime are contained in Section 4 of this paper and relate to both licensed electricity supply companies (suppliers) and licensed electricity distribution companies (distributors) (in practice NIE Networks is the only licensed distributor in Northern Ireland). Where appropriate the proposals in relation to suppliers will mirror the approach in the Gas (Individual Standards of Performance) Regulations (Northern Ireland) 2014 (here after referred to as gas

¹ <https://www.uregni.gov.uk/news-centre/electricity-guaranteed-standards-service-call-evidence>

GSS). The proposals for distributors will take influence from the Electricity (Standards of Performance) Regulations 2015 which are currently in force in Great Britain. In both instances we will make the necessary adjustments to reflect differences in industry structure and practice. The Utility Regulator is in the process of creating a first draft of the new Guaranteed Standards of Service Regulations which will follow in a second consultation paper and can provide further detail on request.

As part of our review we intend to update the compensation sums payable where the electricity GSS are not met. This will mean that the sums payable will differ between the electricity and gas industries in Northern Ireland. In light of this we may consider updating the gas GSS at some point in the future.

Consultation responses should be received by **5.00pm on Wednesday 31st May 2017** and be sent where possible by email to Laura.Kane@uregni.gov.uk or Electricity_Networks_Responses@uregni.gov.uk. Responses can also be sent by post to Laura Kane, The Utility Regulator, Queen's House, 14 Queen Street, Belfast, BT1 6ED.

1. Introduction

- 1.1. Guaranteed Standards of Service (GSS) set out prescribed levels of service which customers can expect from companies in individual cases. If the company fails to provide the level of service required, it must make a payment to the customer affected, subject to certain exemptions.
- 1.2. This consultation is part of the Utility Regulator's (UR's) commitment to review and update the current GSS for electricity companies. The GSS review was identified as a priority within strategic objective 3 of the UR Consumer Protection Strategy 2016/2017 – 2020/21² to empower customers through education and transparency.
- 1.3. The current GSS regime in Northern Ireland (NI) is set out The Electricity (Standards of Performance) Regulations Northern Ireland 1993³ which came into force on 1st January 1994. These regulations were made under Article 42 of the Electricity (NI) Order 1992 by the Director General of Electricity. The 1993 Regulations were subsequently amended by the Electricity (Standards of Performance) (Amendment No 3) Regulations (NI) 1999 and the current standards have been in place since 1st October 1999⁴. The current GSS Regulations in NI are summarised in Appendix 1.
- 1.4. The current GSS regime in NI means that Northern Ireland Electricity Networks Limited (NIE Networks) has a set of minimum standards of performance it is obliged to meet. These standards protect customers and provide for payments to be made to individual customers if prescribed levels of performance are not met. The standards are available on NIE Networks' website at <http://www.nienetworks.co.uk/help-advice/customer-standards> and in Appendix 1 of this document.
- 1.5. NIE Networks also adheres to Overall Standards of Service (OSS) which are available on NIE Networks' website at <http://www.nienetworks.co.uk/help-advice/customer-standards/overall-standards>. Overall Standards of Service are performance targets

² https://www.uregni.gov.uk/sites/uregni.gov.uk/files/mediafiles/Consumer_Protection_Strategy_final.pdf

³ <https://www.uregni.gov.uk/sites/uregni/files/media-files/Electricity%20%28Standards%20of%20Performance%29%20Regulations%20%28Northern%20Ireland%29.pdf>

⁴ <http://www.legislation.gov.uk/nisr/1999/366/contents/made>

applicable to customers as a whole. No compensation payments are attached to the OSS and these are specified in a Determination⁵ by the Utility Regulator made under Article 43 of The Electricity (Northern Ireland) Order 1992.

- 1.6. The current GSS regime in NI provides exemptions in certain circumstances when the regulations do not apply, which means that no guaranteed standard payments would be due to be paid by the distributor. The exemptions apply in severe weather where the number of faults affecting the high voltage network exceeds 13 times the normal operations⁶. There are also instances where an exemption may apply which include when the company is unable to access a property, or where the customer agrees to the electricity not being restored within the prescribed timescales.
- 1.7. The Office of Gas and Electricity Markets, (Ofgem), the energy regulator in Great Britain (GB) updated its GSS in 2010 and 2015. The current GSS regime in GB applies to both electricity distributors and electricity suppliers and is set out in the Electricity (Standards of Performance) Regulations 2015⁷ (summarised in Appendix 3); the Electricity (Connection Standards of Performance) Regulations 2015⁸ and the Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015⁹. These standards are envisaged to remain in place for the duration of the current price control period (until 2023).
- 1.8. The UR has identified that in light of the Ofgem reviews of GSS in 2010 and 2015, the level of consumer protection offered to consumers in GB has superseded that in NI. We are also aware that the current GSS in NI have been in place since 1999, and therefore the GSS regime requires to be updated with the introduction of new regulations.

⁵ Available for view at request to UR from the Electricity Register Document DET056

⁶ Figures from NIE Networks show that the 2015/16 average HV faults/day is 5.4, and the rolling 10 year average figure is 5.68.

⁷ http://www.legislation.gov.uk/ukxi/2015/699/pdfs/ukxi_20150699_en.pdf

⁸ Further details on Ofgem's 2015 revision of Network company GSS may be accessed at: <https://www.ofgem.gov.uk/publications-and-updates/electricity-standards-performance-regulations-2015-and-electricity-connection-standards-performance-regulations-2015>

⁹ <http://www.legislation.gov.uk/ukxi/2015/1544/contents/made>

1.9. In the Call for Evidence we sought respondents' views on the approach to take in developing a new GSS framework in Northern Ireland. Five responses were received from the following stakeholders:-

- NIE Networks Ltd;
- National Energy Action (NEA);
- The Consumer Council for Northern Ireland (CCNI);
- SSE Airtricity Ltd;
- Power NI.

1.10. This Consultation Paper takes into account the content of the responses received and sets out our proposed approach to the electricity GSS review.

1.11. The proposals for a new GSS regime are contained in Section 4 of this paper and relate to both licensed electricity supply companies (suppliers) and licensed electricity distribution companies (distributors) (in practice NIE Networks is the only licensed distributor in Northern Ireland). Where appropriate the proposals in relation to suppliers will mirror the approach in the Gas (Individual Standards of Performance) Regulations (Northern Ireland) 2014¹⁰ (here after referred to as gas GSS). The proposals for distributors will take influence from the Electricity (Standards of Performance) Regulations 2015 which are currently in force in Great Britain (GB). In both instances we will make the necessary adjustments to reflect differences in industry structure and practice.

1.12. As part of our review we intend to update the compensation sums payable where the electricity GSS are not met. This will mean that the sums payable will differ between the electricity and gas industries in Northern Ireland. In light of this we may consider updating the gas GSS at some point in the future.

¹⁰ https://www.uregni.gov.uk/sites/uregni.gov.uk/files/media-files/2014-03-03_The_Gas_Individual_Standards_of_Performance_Regulations_Northern_Ireland_2014.pdf

2. Purpose of this Consultation

- 2.1. As the second stage in the process of the review of GSS, this Consultation will consider stakeholder responses from the Call for Evidence which are summarised in Section 3 of this document.
- 2.2. This Consultation will also set out our proposed approach to creating a new GSS regime in NI and invites further feedback from stakeholders and interested parties, including electricity customers. The UR seeks examples and evidence, where relevant, in order to inform the next steps in the GSS review.
- 2.3. The information gathered from the responses to this consultation will be used to inform our decision on the content of a new set of GSS Regulations, and on any revisions that may be needed to the OSS.
- 2.4. This Consultation includes a questionnaire for respondents to complete which takes the form of an Excel spreadsheet which is separately appended. There may be further issues that have not been identified and we request that respondents include any additional information which the UR should take into consideration at the bottom of the second tab of the questionnaire (Additional Factors section).

Contact details

- 2.5. If you wish to discuss any aspect of this consultation or have any specific questions about what should be submitted, please contact:

Laura Kane
The Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED
Email: Laura.Kane@uregni.gov.uk
Tel: 028 9031 6357

Or :- Electricity_Networks_Responses@uregni.gov.uk

3. Call for Evidence Responses

3.1 The Call for Evidence included a set of questions to which we invited feedback and evidence from relevant stakeholders. Five responses were received from the following stakeholders:-

- NIE Networks Ltd;
- National Energy Action (NEA);
- The Consumer Council for Northern Ireland (CCNI);
- SSE Airtricity Ltd;
- Power NI.

3.2 The questions and responses are summarised below. The full consultation responses will be published on our website alongside this document. The list of questions was wide ranging and as such, not all of the questions were applicable to each stakeholder.

3.3 ***Question 1. Do you see GSS and OSS as an effective tool in protecting consumers and ensuring good customer service? Please outline your reasoning.***

3.4 The responses to this question were positive, indicating that GSS and OSS were useful, effective, important or essential. NIE Networks stated that it is important that the standards strike a balance between cost of delivery and customers' willingness to pay.

UR Response

3.5 The UR views an effective GSS mechanism as an important tool in protecting consumers and ensuring good customer service. The UR acknowledges NIE Networks' comment in relation to customer willingness to pay for improvements to improve service delivery, which could ultimately affect customer bills. This has been taken into account in drafting our proposals in Section 4 of this document.

3.6 ***Question 2. 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?

- 3.7 NEA stated in their response that the GSS and OSS tools needed to be brought in line with GB and that they should apply to both Networks and Suppliers.
- 3.8 NIE Networks highlighted that stakeholder engagement carried out as part of the RP6 Business Plan¹¹ indicated that consumers were broadly happy with existing levels of customer service.
- 3.9 CCNI affirmed the need for a fitness for purpose review and highlighted the timescales and compensation payment levels. They also suggested that all payments made should be automatic without the consumer having to make a claim.
- 3.10 Power NI considers that the GSS/OSS regime should be re-focused on providing customer protections via the 'common services model'¹². They also suggested the need for reporting transparency and the need to recognise that Supplier Codes of Practice¹³ have significantly increased consumer protection. They also suggested that the GSS should be made clearer as they include compensation payments in relation to bills, which NIE Networks don't typically provide to customers.

UR Response

- 3.11 The UR acknowledges that GSS should apply to both supply and distribution customers. We note the suggestion that all compensation payments made should be automatic without the consumer having to make a claim. We have considered how compensation payments are made in Section 4 of this document. We recognise the need for transparency and clarification which are key themes in our review of GSS.
- 3.12 We also recognise that Supplier Codes of Practice have significantly improved the levels of protection for consumers. However we consider that

¹¹ <http://www.nienetworks.co.uk/Investment/Investing-For-The-Future>

¹² [Electricity metering services are all performed as part of the common services included in NIE Networks licence. These common services include meter operations, data collection, processing and registration.](#)

¹³ <https://www.uregni.gov.uk/consumer-protection>

consumer protection can be further improved by the introduction of supplier standards for electricity supply companies to mirror those in both the GB market and the gas market in NI.

3.13 Question 3 - 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?

3.14 NEA stated that enhanced payments and extension to timeframes for making claims under GSS are crucial. They also highlighted a need to monitor and publish goodwill payments made by companies.

3.15 CCNI considers that the review of GSS in GB has improved consumer protection and acknowledged in particular the review of timescales and compensation payment levels. They also suggested that all payments made should be automatic without the consumer having to make a claim.

3.16 NIE Networks noted that the majority of standards in NI are broadly equivalent to the standards in GB with the main differences in restoration times, but that this reflects differences in historical investments made by the GB DNOs (Distribution Network Operators) funded by the GB customer. They also highlighted that their business plan for the RP6 ¹⁴Price Control period has been prepared based on the existing standards and that the appropriate time to consider changes to the standards would be at the beginning of the RP7 Price Control period, so that these could be taken into consideration in their business plan.

3.17 SSE Airtricity stated that many of the standards implemented in GB are already contained in the GSS in NI with the exception of the severe weather categories for supply restoration. They indicated that they would support the introduction of severe weather categories, which they believe would lead to a positive customer experience.

¹⁴ More information on the proposals for the RP6 Price Control can be found here:-

<https://www.uregni.gov.uk/consultations/nie-networks-transmission-and-distribution-price-control-rp6-draft-determination>

UR Response

3.18 The UR recognises that NIE Networks will require time to adjust to a new GSS regime. In relation to compensation payments, the UR has considered the way in which the payments are made, either automatically or with the consumer having to submit a claim to the company in Section 4 of this paper.

3.19 ***Question 4 - 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?

3.20 NIE Networks stated that competition in the market for new connections is the best way to ensure customers receive good and efficient service. They also stated that they are currently in the process of opening up the market fully to competition in early 2018, having successfully opened the market for distribution connections >5MW at the end of May 2016. NIE Networks' key focus for 2017 is to deliver a business transformation programme to open the market for distribution connections <5MW to competition.

3.21 NIE Networks also stated that this is a major programme of work, and significant changes are being made to NIE Networks IT systems to accommodate a contestable market. However these changes do not include the required metrics which they understand would be necessary to implement / monitor connection standards as applicable in GB.

3.22 NIE Networks added that some of the GB connections standards are targeted at contestable works; so the market needs to be opened fully before such standards can be applicable in NI.

3.23 CCNI considers that there is merit in replicating a regime in NI for connections similar to that implemented in GB. They referenced anecdotal evidence which highlights that consumers experience frustrations with both information and timescales during the connections process. This includes delays to works, changes to quotes for works and difficulties contacting key liaisons.

- 3.24 CCNI stated that they would therefore welcome clear and concise guidance that provides consumers with reassurance and protection but also incentivises the network operator to provide excellent customer service. They would also welcome views of network providers to inform how the implementation of connections standards would impact upon them and the relevance of conditions being practiced in GB.
- 3.25 NEA stated that they believe a GSS regime for connections similar to that in GB should be introduced in NI.
- 3.26 Power NI stated that the NI electricity market is significantly different to the GB model. They stated that the 'common services' model provides important efficiencies and cost benefits to consumers. They further stated that a negative aspect of the 'common services' model is that suppliers have little real influence over the quality of the service provided by NIE Networks on their behalf and that this is where the GSS and OSS have a vital role to play. They also stated that many of the standards in relation to security of supply and restoration are applicable in both markets however additional standards placed on NIE Networks, especially in relation to appointments and meter reading are appropriate in the NI context.

UR Response

- 3.27 The UR currently has an active workstream¹⁵ to consider a connections policy for NI, within which any GSS for connections will be considered. The UR is planning to introduce a contestability licence modification with full implementation planned for early 2018.
- 3.28 ***Question 5 - What is the impact of not updating the GSS regime in NI?***
(a) for domestic consumers
(b) for businesses consumers?
- 3.29 CCNI consider that review is required in line with a best practice approach. They stated that the GB review was heavily influenced by experience and learning obtained following storms in December 2013. CCNI drew comparisons to the NI snow storms in March 2013. They highlighted that

¹⁵ <https://www.uregni.gov.uk/consultations/electricity-connections-consultation>

this impacted significantly on both domestic and business consumers and believe the detriment and inconvenience they experienced should similarly inform any NI review of GSS.

- 3.30 Power NI welcome an enhanced focus on meter reading for both domestic and commercial customers in the NI context. They stated that suppliers rely upon and pay NIE Networks to provide accurate readings and this function is critical in ensuring that the end consumer billing is as accurate as possible.
- 3.31 NEA stated that there would be a negative impact on consumers if the GSS are not reviewed.
- 3.32 NIE Networks referred to the stakeholder engagement carried out as part of the RP6 Business Plan indicating that consumers were broadly happy with existing levels of customer service. They also stated that the RP6 plan includes targets to restore 90% of customers within 3 hours by the end of RP6 (currently an 87% standard) and 100% of customers within 18 hours (currently a 24 hour standard). NIE further stated that the majority of standards in NI are equivalent, or broadly equivalent, to the standards in GB. The main differences relate to the length of time allowed to restore supplies after a fault, and to a requirement to offer 2-hour appointment windows (instead of AM or PM).

UR Response

- 3.33 We consider that not updating the GSS regime would have a negative impact on consumers. In updating the GSS Regulations, the UR is fulfilling its statutory duty to protect the short and long term interests of consumers.
- 3.34 ***Question 6 - What is the impact of updating the GSS regime in NI to align with GB?***
(a) for domestic consumers
(b) for businesses consumers
- 3.35 NEA stated that this provides for better and enhanced protection for consumers and drives performance standards within companies.
- 3.36 SSE Airtricity considers that the key changes to GSS introduced in GB would have a positive impact on NI consumers & business. They stated that

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. They support the introduction of severe weather categories in NI similar to those in place in GB as they consider that this will have a positive customer impact.

- 3.37 Power NI suggested that rather than following or not following the GB model that the UR take from the GB model what is appropriate for NI and amend the GSS/OSS framework to reflect the 'common services' model which is a successful element of the NI electricity market.
- 3.38 CCNI stated that updating GSS in NI to align with GB should provide domestic and business consumers with improved protection, specifically in relation to current timescales and payment amounts. They further stated that updating GSS to align with GB will incentivise the network provider to minimise the impact of power cuts, whilst making default payments will raise consumer awareness of standards of service and eradicate the barrier of burdensome claim submissions.
- 3.39 CCNI also suggested that the UR GSS review should consider the consumer impact, detriment and dissatisfaction resulting from the removal of the planning permission prerequisite to obtain an electricity connection. They also stated that the review should consider how GSS can help improve customer service and consumer satisfaction around electricity connections.
- 3.40 NIE Networks highlighted that their RP6 business plan was developed on the basis of the existing GSS. They stated that if the GSS were to be changed, they would need to revisit the plan. They stated that the implementation of a 12 hour restoration time under normal weather conditions would have a significant impact on NIE Networks. They also highlighted that GB DNOs have had funding and incentive mechanisms available over the last two price control periods, which had not been provided in NI.
- 3.41 NIE Networks also stated that the 12 hour restoration period in GB has been introduced incrementally, from 24 hours to 18 hours in 2000 and subsequently to 12 hours in 2015. They stated that introducing a 2-hour appointment standard would reduce the efficiency in the scheduling of metering appointments by increasing travel and unproductive times for their

electricians. NIE Networks said that they face an issue regarding the small size of overhead line conductor which is more prone to damage during bad weather.

UR Response

- 3.42 In drafting our proposals for GSS arrangements which are tailored for NI, the UR has taken influence from both the GB GSS regime and the NI Gas GSS regime.
- 3.43 In addition, we have taken into consideration stakeholder feedback. We note NIE Networks' concerns in their ability to meet the supply restoration standard of 12 hours and in attending appointments within two hours within the RP6 Price Control. The UR recognises the need to allow businesses time to adjust to new GSS arrangements and as such, our proposals are not a direct read across from the current GB regime. This is further discussed in Section 4 of this document.
- 3.44 In relation to CCNI's comments on electricity connections, the UR currently has an active workstream¹⁶ to consider a connections policy for NI, within which any GSS for connections will be considered.
- 3.45 ***Question 7 - 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?***
- 3.46 NEA answered yes to this question but stated that the relevance is much less known amongst vulnerable groups.
- 3.47 NIE Networks and Power NI indicated that service is important to all customer groups.
- 3.48 CCNI highlighted the different ways in which consumers and businesses can be affected by incidents such as unplanned power cuts. CCNI stated that a review of GSS should consider relevance and value to all network customer

¹⁶ <https://www.uregni.gov.uk/consultations/electricity-connections-consultation>

groups and achieve a balance that adequately reflects all detriment or inconvenience incurred.

- 3.49 SSE Airtricity considers 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 and that each customer group should be assessed separately. They stated that in the domestic sector customers critically dependent on electricity may require additional notice for a power outage to allow the customer make alternative arrangements.
- 3.50 SSE Airtricity also suggested that 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.
- 3.51 SSE Airtricity considers 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. They suggest that these groups should be given longer notification periods as alternative arrangements may need to be put in place. They also suggested that if adequate notice is not given then compensation payments could scale with the size of connection, for example. They further stated that depending on the customer type adequate financial arrangements must be put in place also for unplanned interruptions. They highlighted that under decisions contained in SEM-15-071¹⁷, generation sites receive compensation if a fault or planned outage occurs on the transmission network, however it does not extend to the distribution network. SSE Airtricity holds the view that adequate compensation arrangements are required for faults/outages on the distribution network also.

¹⁷ <https://www.semcommittee.com/publication/sem-15-071-outturn-availability-decision-paper>

UR Response

- 3.52 The GSS regime aims to create a uniform approach in acknowledging the inconvenience caused to the customer when company performance dips below the prescribed level. The compensation payment values do not reflect or attempt to remedy the actual loss experienced by each customer in the unique circumstances of every case. The UR proposes to continue with this approach. The difference in payment values for domestic and business customers recognises the harsher impact that failures to meet the guaranteed standards may have on business customers.
- 3.53 In recognition of the effect supply interruption can have on a customer, and in particular on a business customer, the UR intends to maintain the current notification period in NI which is at least three days, rather than adopting the approach in GB which allows a distribution company to give at least two days notice.
- 3.54 ***Question 8 - Are the current levels of compensation under the GSS regime in NI still appropriate?
(a) if no, to what extent should they be changed?***
- 3.55 SSE Airtricity answered this in question 7 in which they stated 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 and that each customer group should be assessed separately. They stated that in the domestic sector customers critically dependent on electricity may require additional notice for a power outage to allow the customer make alternative arrangements.
- 3.56 SSE Airtricity also suggested that 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.
- 3.57 SSE Airtricity considers 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. They suggest that these groups should be given longer notification periods as alternative arrangements may need to be put in place. They also suggested

that if adequate notice is not given then compensation payments could scale with the size of connection, for example. They further stated that depending on the customer type adequate financial arrangements must be put in place also for unplanned interruptions. They highlighted that under decisions contained in SEM-15-071¹⁸, generation sites receive compensation if a fault or planned outage occurs on the transmission network, however it does not extend to the distribution network. SSE Airtricity holds the view that adequate compensation arrangements are required for faults/outages on the distribution network also.

3.58 CCNI welcomes consideration of GB modelling in relation to the GSS review together with the consideration of inflation on payment values.

3.59 NIE Networks stated that excluding the restoration of supply standard, the levels of compensation in NI are comparable to those in GB.

3.60 NEA stated that the current levels of compensation should be harmonised to reflect GB compensation.

UR Response

3.61 The UR proposes to increase the compensation payments to a value commensurate with that available to customers in GB. We recognise that these compensation levels will vary from those applied to gas consumers. We intend to review the gas GSS following completion of the electricity GSS.

3.62 ***Question 9 - Should there be any difference in compensation for the different customer groups? (Domestic, SMEs and large businesses)***

3.63 NIE Networks stated that the differentials under the current GSS are reasonable and comparable with GB.

3.64 NEA stated that the particular needs of very vulnerable households should be taken into consideration as any impact on them may be greater and graver. They raised the question as to whether critical care and customer care registers could assist in identification of these households.

¹⁸ <https://www.semcommittee.com/publication/sem-15-071-outturn-availability-decision-paper>

- 3.65 CCNI consider that there is merit in reviewing compensation levels between customer groups. They stated that business customers would argue that a power cut costs them considerable financial detriment, whereas consumers and particularly those who are vulnerable will experience inconvenience and hardship.
- 3.66 SSE Airtricity hold the 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. They gave the example of large business or generation sites which may require more than three days notice of a power outage if it will result in closure or loss of output.

UR Response

- 3.67 The UR has addressed these points in response to question 7 in which we stated that the GSS regime aims to create a uniform approach in acknowledging the inconvenience caused to the customer when company performance dips below the prescribed level. The compensation payment values do not reflect or attempt to remedy the actual loss experienced by each customer in the unique circumstances of every case. The UR proposes to continue with this approach. The difference in payment values for domestic and business customers recognises the harsher impact that failures to meet the guaranteed standards may have on business customers.
- 3.68 In recognition of the effect supply interruption can have on a customer, and in particular on a business customer, the UR intends to maintain the current notification period in NI which is at least three days, rather than adopting the approach in GB which allows a distribution company to give at least two days notice.
- 3.69 **Question 10 - Is there sufficient consumer awareness of the GSS mechanism?**
(a) if no, how could this be improved?
- 3.70 NEA stated that there is not sufficient consumer awareness and suggested an awareness campaign to include individuals and trusted intermediaries, CCNI, NEA and the broader advice sector.

3.71 NIE Networks stated that the GSS are set out clearly on their website with information on how customers can claim compensation.

3.72 CCNI were uncertain as to the level of awareness of GSS for all consumers actually impacted by incidents covered by the regime. They consider that the necessity for consumer awareness is lessened if automatic payments are introduced.

UR Response

3.73 The UR acknowledges the need for consumer awareness and would welcome any awareness-raising from trusted intermediaries. Our proposals mirror the provisions in the Gas GSS in NI and in the current GB GSS regime on providing information to customers. There is a requirement for suppliers to annually dispatch information to customers on GSS and OSS which we consider will significantly raise awareness.

3.74 The UR also proposes that the majority of compensation payments are made automatically without the customer having to make a claim, subject to the circumstances in certain regulations in which the company may not be aware that a standard has been breached without notification from the customer. This is further discussed in Section 4 of this document.

3.75 ***Question 11 - What is the best way for a company to demonstrate that it meets or exceeds the defined GSS?***

3.76 SSE Airtricity considers the most appropriate way for a network company to demonstrate adherence is by way of REMM reporting. SSE Airtricity also considers that network companies should complete an annual licence compliance statement.

3.77 CCNI believes that the Utility Regulator is best placed to ensure the company demonstrates that it meets or exceeds defined GSS. They suggested that this information can be gleaned through the rigorous REMM reporting that is currently shared or a mandatory licence condition could be applied to ensure information is shared.

3.78 Power NI welcomed an enhanced reporting framework perhaps utilising the REMM framework.

3.79 NEA suggested that the information could be placed on the company website and the Utility Regulator website and that performance could be benchmarked with other companies across GB.

UR Response

3.80 The UR recognises the need for transparent reporting of performance under the GSS regime and this is reflected in our proposals to publish information on company performance under the GSS requirements on our website. Currently monitoring information is collected on gas supply GSS through the REMM reporting framework and it is intended to collect the electricity supply GSS in the same manner. Gas distribution companies submit an annual GSS return demonstrating their performance against the standards. We would expect that all GSS payments made to customers are reported on, together with any ex-gratia payments made.

3.81 As stated above, the Electricity Supplier GSS monitoring information will be collected through REMM. However, engagement is still ongoing with industry as to the appropriate level of disclosure of REMM data. Once a clear direction has been agreed; a decision will be taken on the appropriateness of any publication of data.

3.82 We would expect that NIE Networks also report on how long it takes them to restore supply. We would like to receive information on both the supply restoration periods of 12 and 18 hours from the beginning of the RP6 Price Control period. It is envisaged that this reporting could be done annually using the Regulatory Instruction and Guidance (RIGS) templates.

3.83 ***Question 12 - Should company results on performance under the GSS regime be made public? Please outline your reasoning.***

3.84 CCNI holds the view that where feasible information should be made publically available. As such they fully support the sharing of performance results and believe this transparency will provide reassurance to consumers and incentivise the company to achieve high level targets. They also stated

that with the potential alignment with GSS in GB, comparative benchmarking could occur.

- 3.85 Power NI welcomed an enhanced reporting framework perhaps utilising the REMM framework.
- 3.86 NEA believes that information should be open and transparent and that goodwill gestures should also be recorded. They stated that companies should be clear about when GSS should be implemented and about the exceptions. They stated that companies should clearly advertise and promote this.
- 3.87 Power NI welcomed an enhanced reporting framework perhaps utilising the REMM framework.
- 3.88 NIE Networks has no objection to this information being published.

UR Response

- 3.89 The UR recognises the need for transparent reporting of performance under the GSS regime and this is reflected in our proposals to publish information on company performance under the GSS requirements on our website.
- 3.90 ***Question 13 - 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?***
- 3.91 CCNI consider that the network operator is best placed to comment, but that they would envisage barriers arising such as the potential cost impact.
- 3.92 NIE Networks highlighted a problem with the timing of the review as the RP6 business plan was prepared on the basis of the existing GSS. They suggested a glide path which spans RP6 and RP7.
- 3.93 NEA saw no reason why barriers should exist to improve GSS and OSS as was the case in GB. They stated that the enhancement could have no impact on issues such as additional IT. They also stated that openness, transparency and increases to default payments should all act as drivers to improve service performance and reliability.

UR Response

- 3.94 The UR is mindful of the timing of this review and has taken the implications on NIE Networks into account in drafting the proposals.
- 3.95 **Question 14 - 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.**
- 3.96 SSE Airtricity stated that supply companies are dependent on NIE Networks on delivering meter reading & fieldwork activities and therefore they do not consider that the GSS should mirror the NI gas GSS arrangements. They stated that many customer queries & complaints relate to meter reading & meter issues and therefore suppliers are dependent on NIE Networks responding to queries before suppliers in turn can provide a resolution to the customer. Given that there are no SLAs (Service Level Agreements)¹⁹ in place for query resolution between NIE Networks & 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.
- 3.97 Power NI stated that the gas and electricity markets in NI are different and the GSS/OSS framework should reflect the differences.
- 3.98 CCNI stated that in their complaints handling role (dealing with energy, transport, water and sewage and postal services) the most common query received year on year is regarding electricity bills. They stated that whereas gas consumers are protected by GSS in respect of responding to complaints promptly, efficient handling of bill queries and payment issues, electricity consumers do not have the same protection. CCNI therefore consider that there is merit in the inclusion of GSS standards for electricity that mirror gas arrangements.
- 3.99 NEA stated yes as they consider that this will enhance the consumer journey.

¹⁹ A service-level agreement is defined as an official commitment that prevails between a service provider (the distributor) and the service user (the suppliers). Particular aspects of the service – quality, availability, responsibilities – will agreed between the service provider (the distributor) and the service user (the suppliers).

NIE Networks stated that the standards should be tailored to meet the specific requirements of the business being regulated.

UR Response

3.100 The UR recognises the need to include a supplier element in any revised GSS review. We have not directly mirrored the Gas arrangements for GSS in NI but have tailored our approach to suit the electricity market. Our proposals which are set out in Section 4 include GSS for suppliers in relation to charges and payments, complaints and appointments.

4. Proposed Approach to the Review

4.1. In formulating a proposed approach to the GSS review, the UR has taken into account the following:-

- Stakeholder feedback from the Call for Evidence;
- Consumer and market research²⁰;
- The need to align consumer protection in NI with that in GB;
- The need to align consumer protection with that currently available to gas customers in NI;
- The fitness for purpose of the existing regulations.

Proposals

4.2. The new regime which the UR proposes to introduce contains updated provisions of some GSS which are currently in place in NI and will also introduce brand new standards. The changes which we are considering for the proposed new GSS regime are-

- A reduction in the restoration time due to a fault from 24 hours to 18 hours;
- An increase in the compensation payment values to align with GB;
- An introduction of a categories of “severe weather”²¹ for supply restoration;
- An introduction of GSS for multiple disconnections;
- An introduction of GSS for rota disconnection;
- A standard for distribution companies in relation to responding to complaints;
- A standard for distribution companies in relation to metering errors;

²⁰ https://www.uregni.gov.uk/sites/uregni.gov.uk/files/consultations/GSS_Report_May_2010.pdf;
http://www.consumercouncil.org.uk/filestore/documents/Empowering_Consumers_CEAP_report_FINAL.pdf;
http://www.consumercouncil.org.uk/filestore/documents/2015_Consumer_Energy_Research_Findings_Summary.pdf;

http://www.nienetworks.co.uk/documents/Future_Plans/Empowering-Consumers-CEAP-report-2016

²¹ The UR implemented a licence modification on 5th February 2015 to include a definition of “severe weather event” <https://www.uregni.gov.uk/news-centre/utility-regulator-publishes-its-decision-paper-nie-licence-mod-severe-weather>

- Automatic compensation payments for the supply restoration and rota disconnection standards for Critical Care²² Register customers and vulnerable customers²³;
- Annual reporting; and
- Supplier GSS for interactions with the Electricity Distributor in relation to Metering issues, Appointments, Charges and Payments, Complaints, Timing of notification and Notice of Rights.

4.3. Each of the proposals are discussed below and summarised in Table 3 which sets out the existing GSS and the new GSS standards which the UR proposes to introduce. The UR is in the process of creating a first draft of the new GSS Regulations which will follow in a second consultation paper and can provide further detail on request.

Compensation Payments

4.4. The GSS regime aims to create a uniform approach in acknowledging the inconvenience caused to the customer when company performance dips below the prescribed level. The compensation payment values do not reflect or attempt to remedy the actual loss experienced by each customer in the unique circumstances of every case. The UR proposes to continue with this approach.

4.5. We propose to increase the GSS payment values in NI to mirror those available for customers in GB. The payment values are shown in Table 3.

4.6. We acknowledge that these compensation payments will be higher than those applied to gas consumers within the gas GSS Regulations. However we intend to carry out a review of the gas GSS Regulations following review of the electricity GSS Regulations.

4.7. In GB, the majority of compensation payments²⁴ are made automatically to Priority Services Register²⁵ customers. The Priority Service Register

²² NIE Networks offer a critical care information service to customers who are dependent on life supporting electrical equipment. Being on the register means customers will receive up to date information by phone during a power cut or a planned interruption.

²³ Vulnerable persons are defined in NIE Networks Distribution Licence as persons of state pensionable age, or those who are disabled, blind or deaf. https://www.uregni.gov.uk/sites/uregni.gov.uk/files/media-files/NIE_Distribution_Licence_-_Condition_21_Modifications_-_effective_21_September_2016.pdf

provides additional services for customers who are of pensionable age; are disabled or chronically sick; have a long-term medical condition; have a hearing or visual impairment or additional communication needs or are in a vulnerable situation.

4.8. We propose to mirror this provision in so far as is possible by automating the majority²⁶ of compensation payments for Critical Care Register customers and vulnerable customers. As part of the Consumer Protection Strategy implementation, the UR has committed to review the Network companies Critical Care Registers. NIE Network's Critical Care Register is the largest database of vulnerable customers with approximately 6,000 customers registered. We are currently engaged with NIE Networks in regards to the review of their Critical Care Register, discussing issues such as promotion of the register amongst consumers and data protection issues.

4.9. For all other customers, GSS payments should be made automatically by the company, except for:-

- Supply restoration GSS (both normal and severe weather conditions) where a customer must make a valid claim within three months of the date supply is restored;
- The GSS in relation to multiple interruptions where a customer must make a valid claim within three months of the end of the year which runs from 1st April to 31st March and;
- The GSS in relation to notice of planned interruptions where a customer must make a valid claim within one month of the failure to provide the notice.

²⁴ Customers are required to submit a claim in relation to Regulation 10 (Multiple interruptions) and Regulation 12 (Notice of Supply Interruption) in the GB Electricity (Standards of Performance) Regulations 2015.

²⁶ All customers, whether on the critical care/vulnerable register or not, will need to make a claim in relation to the GSS for multiple interruptions and notice of a planned interruption. This is because the company may not be aware that it has failed to meet this standard without the customer submitting a claim.

Supply Restoration

4.10. The current standard in NI is 24 hours for supply to be restored following a fault, after which a compensation payment is triggered. In GB the current standard is 12 hours which was introduced by the Electricity (Standards of Performance) Regulations 2015. In the previous GB Regulations introduced in 2010 the standard was 18 hours.

4.11. We intend to reduce the restoration time in NI during normal weather conditions to 18 hours (when less than 5,000 customers are affected), after which a GSS payment of £75 will be triggered for domestic customers and a payment £150 will be due for non domestic customers. We will consider reducing this restoration period to 12 hours to align with the current standard in GB at a future date.

4.12. We propose to introduce a new standard for supply restoration in normal weather conditions when more than 5,000 customers are affected. The restoration period will be 24 hours, after which a payment will be due of £75 compensation for domestic customers and £150 for non domestic customers. A further payment of £35 will be due for every subsequent 12 hour period in which supply is not restored, subject to a maximum cap of £300. This standard aligns with the current provisions in GB.

4.13. We propose to introduce a GSS standard for cases of severe weather which mirror the provisions currently in GB. Regulations 5, 6 and 7 of the Electricity (Standards of Performance) Regulations 2015²⁷ provide three categories of severe weather events as follows:-

- Category 1 (medium events) includes lightning events – where there are at least 8 times the daily average amount of faults in a 24 hour period affecting less than the category 3 threshold number of customers; and non-lightning events—where there are between 8 and 13 times the daily average amount of faults in a 24 hour period affecting less than the category 3 threshold number²⁸ of customers. In category 1 events supply is to be restored within 24 hours.

²⁷ http://www.legislation.gov.uk/uksi/2015/699/pdfs/uksi_20150699_en.pdf

²⁸ In GB each designated electricity distributor has its own threshold number of customers specified in the table in Schedule 2 of the 2015 GB Regulations.

- Category 2 (large events) includes non – lightning events where there are at least 13 times the daily average amount of faults in a 24 hour period affecting less than the category 3 threshold number of customers. In category 2 events supply is to be restored within 48 hours.
- Category 3 (very large events) applies to both all severe weather events in which supply is to be restored in a period as calculated by the following formula:-

$$48 \times \left(\frac{\text{total number of customers interrupted}}{\text{category 3 threshold number of customers}} \right)^2$$

4.14. In relation to all three categories of severe weather events, we propose that a payment of £70 is triggered where there is a failure by the distributor to meet the standard. We also propose that for each subsequent period of 12 hours after the initial prescribed period has passed, an additional compensation payment of £70 is made, subject to a maximum cap of £700.

Impact of New Supply Restoration Standards on NIE Networks

4.15. With the existing GSS Regulations in NI, an exemption exists for instances of severe weather events, where the number of faults affecting the high voltage network exceeds 13 times the normal operations. During the last major storms in 2010 and 2013 NIE Networks were therefore deemed exempt from compliance with the supply restoration GSS.

4.16. In the last six years, if provisions for severe weather events which mirror the current GB regime had been in place during these two storms, NIE Networks estimate that they would have paid out £2.5 million in GSS payments.

4.17. Under the proposed supply restoration standards for normal conditions (18 hours), had these provisions been in place, NIE Networks would have had to pay over £150k in compensation over the 6 years.

4.18. Table 1 below shows the estimated payments NIE Networks would have made under the proposed new provisions for supply restoration²⁹.

Table 1 – estimated payments by NIE Networks had the proposed provision for supply restoration been in place in 2010-2016

Number of Hrs Interrupted	Number of LV & HV customers between 2010 - 2016 Interrupted in Normal Conditions after 18Hrs	Normal conditions - (less than 5000 customers) = £75 payment*	Number of LV & HV customers between 2010 - 2016 Interrupted in Severe Weather Conditions	Severe Weather Conditions Category 2 = £70 payment per period after 48Hrs**
More than 18 Hrs	1,840	138,000	47,451	-
More than 24 Hrs	229	17,175	36,452	-
More than 48 Hrs	55	4,125	15,148	1,060,360
More than 60 Hrs	40	3,000	10,179	712,530
More than 72 Hrs	26	1,950	5,650	395,500
More than 84 Hrs	19	1,425	3,505	245,350
More than 96 Hrs	16	1,200	1,407	98,490
More than 108 Hrs	12	900	583	40,810
More than 120 Hrs	11	825	68	4,760
More than 132 Hrs	8	600	5	350
Totals		169,200		2,558,150

* Based on domestic customer, if payment is to a non-domestic customer it will increase to £150

** If it is a large event i.e. Category 2 - >13 times the 24hr average faults, the Prescribed Period is 48 hrs

Performance of GB DNOs against the 2015 Regulations

4.19. Ofgem's Electricity Distribution Company performance Report 2010 to 2015³⁰ shows that during the Price Control period DPCR5, the GB DNOs paid out just under £11 million under the Guaranteed Standards. Almost half of this amount was paid out in the 2013-14 year. The average payment was around £30 for mandatory payments, and £72 for ex gratia payments.

4.20. The table below shows what GB DNO's have paid out under GSS in the 2010-2015 period³¹:-

²⁹ UR Analysis of data provided by NIE Networks Limited

³⁰ <https://www.ofgem.gov.uk/publications-and-updates/electricity-distribution-company-performance-2010-2015>

³¹ CH3 DPCR5 Delivery Tab of [DPCR5 performance report 2010-2015 data table](#)

Table 2 – GB DNO payments under GSS from 2010-2015

Mandatory and ex-gratia payments and amounts by DNO

Guaranteed Standard	Total number of mandatory payments	Total value of mandatory payments	Total number of ex-gratia payments	Total value of ex-gratia payments
ENWL	3,454	£124,635	11,161	£653,548
NPGN	776	£26,941	17,176	£1,083,130
NPGY	585	£19,188	9,779	£572,520
WMID	139	£3,685	5,912	£391,199
EMID	24	£663	2,761	£189,374
SWALES	6	£138	644	£23,999
SWEST	11	£234	656	£30,787
LPN	2,017	£100,425	2,487	£151,051
SPN	2,641	£87,643	15,253	£1,934,741
EPN	5,288	£183,839	20,031	£1,725,666
SPD	29	£960	17,606	£920,163
SPMW	195	£941	15,159	£781,319
SSEH	139	£2,919	7,947	£594,643
SSES	14,421	£392,611	13,093	£1,044,597
Total	29,725	£944,822	139,665	£10,096,738

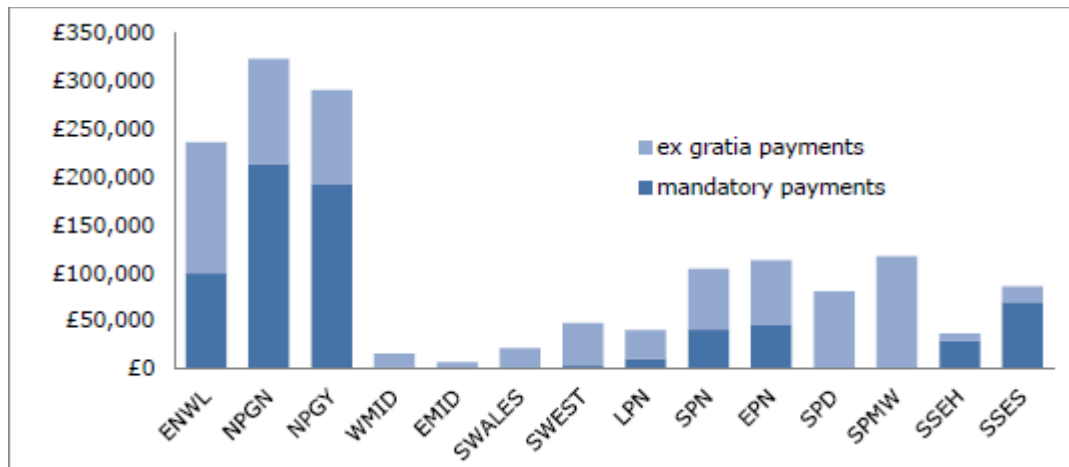
4.21. Ofgem’s latest report for 2015- 2016³² shows the GB DNOs paid out just over £1.5 million under the GSS regime in 2015-16. 72% of this total was paid out for interruptions in normal weather conditions and 9% was paid out for interruptions in severe weather conditions. The figure of £700,000 was mandated through the GSS and a further £800,000 was volunteered by the DNO’s. The average payment was around £62 for mandatory payments and £64 for voluntary payments.

4.22. Figure 1 below shows what GB DNO’s have paid out in 2015-2016 under GSS³³:-

³² https://www.ofgem.gov.uk/system/files/docs/2017/02/riio-ed1_annual_report_2015-16.pdf

³³ Page 20 of the report https://www.ofgem.gov.uk/system/files/docs/2017/02/riio-ed1_annual_report_2015-16.pdf

Figure 1 – GB DNO GSS payments in 2015-2016



Notice of Supply Interruption

4.23. This provision would require the Electricity Distributor to give notice of a planned interruption to a customer’s supply. The UR intends to maintain the current notification period in NI which is at least three days, rather than adopting the approach in GB which allows an Electricity Distributor to give at least two days notice. If this notice period is not given, and the customer makes a valid claim within one month of the failure to provide the notice, a payment of £30 would be due for domestic customers and £60 for non-domestic customers.

Appointments

4.24. We propose that the Electricity Distributor or Supplier offers a timed appointment for visits to customer premises between 8.30am and 1pm, or 12 noon and 5pm. If this appointment is not kept, a payment of £30 would be due to the customer, paid by either the Distributor or Supplier as relevant. The current GB regime includes a requirement for the company to provide either morning or afternoon appointments or a two hour appointment window. We do not propose to introduce two hour appointment windows.

Multiple Disconnections

4.25. If implemented this would be a new GSS standard in NI, which would provide that where a customer has four or more power cuts in one year, each lasting longer than three hours, the Electricity Distributor must make a compensation payment of £75 to the customer (both domestic and non-domestic), subject the consumer making a claim before the end of the year running from 1st April to 31st March.

Rota Disconnections

4.26. If implemented, this would be a new standard in NI which would apply when supply to a customer's premises is required to be interrupted due to a shortage of supply of electricity. It would enable the supply to be distributed fairly until cause of the shortage could be rectified. If a customer is disconnected on this basis for over 24 hours, a payment of £75 would be triggered for domestic customers, with £150 due for non-domestic customers, paid by the Electricity Distributor.

Metering Errors

4.27. If implemented, this would be a new provision that would apply where a customer is billed an incorrect amount by an Electricity Supplier as a result of an incorrect meter reading or incorrect meter calibration which has arisen due to an error by the relevant Electricity Distributor.

4.28. Where this applies, we propose that a compensation payment of £30, to be paid by the Electricity Distributor, if the Distributor is proven to be at fault, would be appropriate. More detail on this provision is discussed in the Supplier GSS section of this paper from paragraph 4.58.

Complaints

4.29. We propose introducing a standard on responding to complaints which will apply to both Electricity Distributors and Suppliers. We propose that the Distributor or Supplier should provide a response to verbal or written complaints from customers within 10 days, and provide a substantive

response within 20 days. If this standard is not met then a payment of £30 would be due to the customer. This will be a new GSS standard for electricity customers and will mirror the protection offered to consumers in gas in NI. In their Complaints Procedure³⁴, NIE Networks already provide a ten day period for responding to complaints.

Charges and payments

4.30. We propose to introduce a standard for charges and payments relating to both the Electricity Distributor and Suppliers. Suppliers should respond to a request to change a payment method or an account query (as to the correctness of the account or about a GSS payment due) within 5 working days. In addition, the Distributor should address a query regarding payments due under guaranteed standards within 5 working days. GSS payments that are queried should then be made by the Distributor or Supplier within 5 working days. Failure to adhere to this standard would mean that a payment of £30 would be due to the customer from either the Distributor or Supplier.

Provision of Supply and Estimate of Charges

4.31. We would intend that the proposed GSS regulations would retain provisions similar to Regulation 5 (Providing a Supply) and Regulation 6 (Estimate of Charges) which are currently in force in the existing GSS Regulations in NI.

4.32. Regulation 5 requires the Electricity Distributor to make an appointment to install a meter and turn on supply within 2 working days (for domestic customers) or 4 working days (for non-domestic customers), or to keep an appointment for these purposes. The compensation payment due is £50 for domestic customers and £125 for non-domestic customers. Regulation 6 requires the Distributor to provide a cost estimate for a new electricity supply where there is an existing connection within 7 working days (for small jobs) or 15 working days (for larger jobs). The compensation payment due is £50.

³⁴ <http://www.nienetworks.co.uk/help-advice/claims-complaints>

4.33. The UR may amend these Regulations and explore options for further GSS in relation to connections as part of our separate workstream on a connections policy³⁵.

Overall Standards

4.34. We propose to retain the Overall Standards of Performance in relation to the distribution company (set out in Appendix 2 of this document). We propose to set new Overall Standards of Performance for supply companies which will set targets of 97% for customer correspondence and customer complaints in line with the gas overall standards. This would be specified in a Determination from the UR under Article 43 of The Electricity (Northern Ireland) Order 1992.

³⁵ <https://www.uregni.gov.uk/consultations/electricity-connections-consultation>

Supplier GSS

Background

4.35. In 2014, the UR introduced Individual Standard of Service for Gas Suppliers³⁶ in Northern Ireland. These Standards of Service were designed to afford protection to the consumer in terms of services offered to them by Gas Supply and Distribution companies and were defined in 11 Standards.

4.36. The UR will now consult on how this consumer protection will be afforded to electricity customers in Northern Ireland through similar Standards of Service.

4.37. This section of the paper will provide more detail on the UR's proposed GSS for Electricity Suppliers in Northern Ireland.

Proposed Guaranteed Standards of Service for Electricity Suppliers

4.38. In order to be consistent, where appropriate, with the protection offered to energy customers in GB³⁷ and to gas customers within Northern Ireland we propose introducing a number of regulations for Electricity Suppliers. This section of the paper also highlights important interactions between the Electricity Distributor and Electricity Suppliers.

4.39. Therefore, the UR is considering 6 GSS for Electricity Suppliers in Northern Ireland, they include:

1. Meter disputes, Prepayment meters and Metering errors;
2. Appointments;
3. Charges and payments;
4. Complaints;
5. Timing of notification;
6. Notice of rights.

³⁶ <https://www.uregni.gov.uk/sites/uregni.gov.uk/files/media-files/2014-03-03-The-Gas-Individual-Standards-of-Performance-Regulations-Northern-Ireland-2014.pdf>

³⁷ See section 1 of this document for more information on the current GSS regime in GB.

4.40. In this section, a short description of each of the proposed GSS for Electricity Suppliers will be discussed. Details of the existing Service Standards³⁸ (where applicable) and the proposed new GSS will accompany the description of the GSS. The existing electricity GSS Regulations came into force in 1994 prior to the separation of Supply and Distribution and as such refer to the “Supplier”, defined as the “Public Electricity Supplier”, meaning Northern Ireland Electricity, as it was at that time. For the purposes of this paper, when explaining the existing electricity GSS Regulations, we have referred to Northern Ireland Electricity as NIE Networks.

4.41. Finally, the associated compensation payment values for domestic customers if the proposed GSS are not met are also included.

4.42. The UR is in the process of creating a first draft of the new Guaranteed Standards of Service Regulations which will follow in a second consultation paper and can provide further detail on request.

Meter disputes, Prepayment meters and Metering errors

4.43. The UR acknowledges the difference that exists between the gas and electricity industries in regards to meter provision, maintenance and meter reading. In Northern Ireland, NIE Networks is termed the ‘common services provider’³⁹ for meter provision, maintenance and meter reading in regards to the electricity industry.

4.44. The common service provider model does not exist in the gas industry in Northern Ireland. Whilst the Distribution Company is responsible for meter provision and maintenance, the Gas Supplier is responsible for meter reading.

4.45. During the consultation period for the Energy Supplier Codes of Practice⁴⁰, a number of energy industry respondents highlighted the

³⁸ <https://www.uregni.gov.uk/sites/uregni/files/media-files/Electricity%20%28Standards%20of%20Performance%29%20Regulations%20%28Northern%20Ireland%29.pdf> as amended by <http://www.legislation.gov.uk/nisr/1999/366/contents/made>

³⁹ [Electricity metering services are all performed as part of the common services included in NIE Networks licence. These common services include meter operations, data collection, processing and registration.](#)

⁴⁰ <https://www.uregni.gov.uk/consumer-protection>

difference between the electricity and gas industries. In response, the UR reflected these differences in the electricity and gas industries in the construction of the Energy Supplier Codes of Practice.

4.46. In light of the above, the UR proposes to require Electricity Suppliers to notify the Electricity Distributor when a customer informs the Electricity Supplier that a problem has occurred in regards to their meter. This will include instances of meters operating outside the margins of error, meter reading inaccuracies and prepayment meter malfunctions.

4.47. The UR seeks to implement a new GSS which requires the Electricity Supplier to inform the Electricity Distributor of the meter related problem within a specified time period. This obligation already exists for Gas Suppliers. The UR seeks to mirror this requirement for Electricity Suppliers in Northern Ireland. The rate of compensation to be paid to domestic customers if this proposed GSS is not met will be £30.

Meter disputes

4.48. In regards to GSS on Meter disputes, the UR wishes to mirror the current arrangements in the Gas GSS.

4.49. In the existing electricity GSS for meter disputes in NI, the Electricity Distributor must provide customers with an explanation on the probable cause of any meter accuracy issues within a prescribed time of 5 working days. If an appointment is necessary, the Electricity Distributor must offer an appointment within 7 working days to investigate the meter problem.

4.50. We propose to retain this provision and add a new obligation for Suppliers which would apply where the customer informs the Electricity Supplier of a meter issue. We propose that the Electricity Supplier must report this meter problem to the Electricity Distributor within 1 working day.

4.51. The level of compensation paid to customers if this GSS is not met would be set at £30.

4.52. A summary of this proposed GSS is detailed in Table 3.

Existing Guaranteed Standard of Service

4.53. Regulation 8A of the existing electricity GSS Regulations in NI applies where NIE Networks is informed by a customer:-

- (a) that the customer considers that an appropriate meter is or may have been operating outside the margins of error; or
- (b) that circumstances exist which NIE Networks might reasonably expect to have been caused by the meter operating outside the margins of error.

4.54. Once notified, the Electricity Distributor must offer an appointment within 7 working days or offer an explanation within 5 working days if a visit is not required.

Proposed Guaranteed Standard of Service

4.55. This provision would apply where an Electricity Distributor is informed by a domestic customer or an Electricity Supplier:-

- (a) that the domestic customer considers that an appropriate meter is or may have been operating outside the margins of error, or
- (b) that circumstances exist that an Electricity Distributor might reasonably expect to have been caused by the meter operating outside the margins of error.

4.56. Like in Regulation 8A of the existing electricity GSS Regulations in NI, we propose that once notified, the Electricity Distributor must offer an appointment within 7 working days or offer an explanation within 5 working days if a visit is not required.

4.57. We would intend to create a new obligation on Electricity Suppliers in circumstances where a customer informs their Electricity Supplier of an issue with their meter as described above. We would propose that the Electricity Supplier must report this to the Electricity Distributor within 1 working day.

Metering Errors

4.58. The UR recognises that Electricity Suppliers have raised the issue of inaccurate billing due to metering errors through responses to a number of consultations, including the Supplier Codes of Practice. We acknowledge that Electricity Suppliers, due to the common service provider model, rely on metering information being passed to them from the Electricity Distributor.

4.59. As such, we wish to consider introducing a GSS to address these 'Metering errors'. The Gas GSS contain a Regulation on Meter mix-ups (Regulation 4) and we consider that this Regulation could be adjusted for the electricity industry in Northern Ireland. We would suggest that the proposed GSS could be referred to as 'Metering errors' rather than "Meter mix-ups", making reference to calibration errors and meter reading errors.

Existing Guaranteed Standard of Service

4.60. No equivalent standard in Northern Ireland.

Proposed Guaranteed Standard of Service

4.61. If implemented, this would be a new provision that would apply where a customer is billed an incorrect amount by an Electricity Supplier in respect of the electricity supplied to that customer's premises as a result of:-

- (a) The Electricity Supplier calculating the amount billed by reference to an incorrect meter reading or incorrect meter calibration; and
- (b) Such reference to an incorrect meter reading or incorrect meter calibration has arisen as the result of an error by the relevant Electricity Distributor.

4.62. Where this applies, we propose that a compensation payment of £30, to be paid by the Electricity Distributor, if the Distributor is proven to be at fault, would be appropriate.

Prepayment meters

4.63. In regards to GSS on Prepayment meters, the UR wishes to take influence from both the current arrangements in the Gas GSS and the existing electricity GSS.

4.64. We would propose that the Electricity Distributor must deal with reports of problems with prepayment meters within 3 hours during a working day and 4 hours on any other day. Where a customer informs their Electricity Supplier of a problem with a prepayment meter, the Supplier must notify the Electricity Distributor of any report of the problem within 3 hours during a working day and 4 hours on any other day.

4.65. We propose that the rate of compensation for customers if this GSS is not met is £30.

4.66. A summary of this proposed GSS is detailed in Table 3.

Existing Guaranteed Standard of Service

4.67. Regulation 8B of the existing electricity GSS Regulations requires that NIE Networks must deal with a problem with a customer's prepayment meter within 3 hours during a working day or 4 hours on any other day. Where NIE Networks is informed (other than by post) during working hours by a customer who takes their supply through a prepayment meter either that the prepayment meter is not operating to permit a supply to the customer's premises, or if circumstances suggest that the prepayment meter is not operating, where information is received by NIE Networks outside working hours it shall be deemed to have been received at the start of the next working day.

Proposed Guaranteed Standard of Service

4.68. This provision would apply where an Electricity Distributor is informed (other than by post) by:-

(a) a domestic customer who takes their supply through a prepayment meter; or

(b) the Electricity Supplier in respect of a domestic customer who takes their supply through a prepayment meter, that the prepayment meter is not operating to permit a supply to be given to the customer's premises, or circumstances suggesting that it is not operating.

4.69. We propose that the Electricity Distributor must deal with a problem with a customer's prepayment meter within 3 hours during a working day and 4 hours on any other day.

4.70. Under this provision, where information is received by an Electricity Distributor outside working hours it is deemed to have been received at the start of the next working day.

4.71. Where a customer informs their Electricity Supplier of an issue, we propose that the Electricity Supplier must report this to the Electricity Distributor within 3 hours during a working day and 4 hours on any other day.

Appointments

4.72. In regards to GSS on Appointments, the UR wishes to mirror the current arrangements in the Gas GSS.

4.73. In the existing electricity GSS Regulations in NI, a provision for appointments applies to the Electricity Distributor. In making the new standards, we would propose that a provision for appointments would apply to both the Electricity Distributor and the licensed Electricity Suppliers.

4.74. Under this Regulation, we propose that the Electricity Distributor and the Electricity Supplier will be required to offer a customer a timed appointment within a time band and to keep this appointment.

4.75. The UR is proposing that time bands for these appointments be used (am and pm slots); thus ensuring that this provision is consistent with the Northern Ireland Gas GSS.

4.76. During the consultation exercise for the Consumer Protection Strategy⁴¹, a number of consumer bodies raised the issue of appointments with us. The consumer bodies stated the need to have more specific appointment times for customers, particularly vulnerable customers. They informed us that a more specific appointment time would aid in reassuring consumers of the validity of the visit from the utility and make gaining access to domestic premises easier for utility companies. The introduction of this GSS will go some way to addressing this concern raised by consumer bodies.

4.77. The level of compensation paid to customers if this GSS is not met will now be set at £30.

4.78. A summary of this proposed GSS is detailed in Table 3.

Existing Guaranteed Standard of Service

4.79. Regulation 10 of the existing electricity GSS Regulations in NI applies where :-

(a) the customer informs NIE Networks that the customer wishes NIE Networks to visit the customer's premises, or

(b) NIE Networks informs the customer that NIE Networks wishes to visit the customer's premises, being in either case a visit in connection with the activities which NIE Networks is authorised to carry on under their licence which requires access to be afforded to his representative or for which it would otherwise be reasonable to expect the customer to be present.

4.80. NIE Networks is required to offer a timed appointment to visit the customer's premises between 8.30am and 1pm, or 12 noon and 5pm.

Proposed Guaranteed Standard of Service

4.81. We propose that where the customer informs the Electricity Distributor or Electricity Supplier that the customer wishes the Electricity Distributor

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https://www.uregni.gov.uk/sites/uregni.gov.uk/files/mediafiles/Consumer_Protection_Strategy_final.pdf

or Electricity Supplier to visit, the Electricity Distributor or Electricity Supplier must offer a timed appointment for visits to customer premises between 8.30am and 1pm, or 12 noon and 5pm.

Charges and payments

4.82. In relation to Charges and payments, the UR wishes to mirror the current Gas GSS in Northern Ireland and the current GSS in GB.

4.83. In the existing electricity GSS Regulations the Distributor is required to address a query regarding payments due under guaranteed standards within 5 working days. GSS payments that are queried should also be made by the Distributor within 5 working days.

4.84. We propose to add a provision that would require the Electricity Supplier to respond to a customer, within 5 working days, when a customer requests a change in payment method or where the customer queries their account (as to the correctness of the account or about a GSS payment due). If a GSS payment is due, it should be made within 5 working days.

4.85. The rate of compensation for customers if this GSS is not met remains £30.

4.86. A summary of this proposed GSS is detailed in Table 3.

Existing Guaranteed Standard of Service

4.87. Regulation 9 of the existing electricity GSS Regulations in NI applies where a customer informs NIE Networks–

(a) that the customer requests a change in the method by which they make payment to the Electricity Supplier in respect of the supply; or

(b) of a query as to – (i) the correctness of an account relating to the supply presented to the customer by the supplier; or (ii) whether, in relation to a matter or matters described by the customer, any payment ought to be made to the customer and the matter is one to which the

Regulations apply or appear to apply.

4.88. This Regulation requires NIE Networks to address a query regarding payments due under GSS within 5 working days.

Proposed Guaranteed Standard of Service

4.89. This provision would apply where a customer informs a relevant Electricity Supplier:-

(a) that the customer requests a change in the method by which they make payment to the relevant Electricity Supplier in respect of the supply; or

(b) of a query as to (i) the correctness of an account relating to the supply presented to the customer by the relevant Electricity Supplier; or (ii) a GSS payment that ought to be made.

4.90. We propose that the Electricity Supplier should respond to a request to change a payment method or an account query (as to the correctness of the account or a GSS payment due) within 5 working days. If the query relates to a GSS payment which is due, the payment should then be made within 5 days. We also propose that the Electricity Distributor should address a query regarding payments due under GSS within 5 working days. If the query relates to a GSS payment which is due, the payment should then be made within 5 days.

Complaints

4.91. The UR proposes introducing a new GSS for complaints which mirrors the current Gas GSS in Northern Ireland and the current GSS in GB.

4.92. This new Regulation will apply to both the Electricity Distributor and to Electricity Suppliers.

4.93. Under this Regulation, the Electricity Distributor and Electricity Suppliers would be required to respond to a complaint within a prescribed time period; this will ensure consistency with the existing Gas GSS in Northern Ireland and the current GB GSS regime.

4.94. The level of compensation paid to customers if this GSS is not met has been set at £30.

4.95. We note the comments made by SSE and Power NI in relation to the introduction of standards for Electricity Suppliers, however we consider that electricity customers in Northern Ireland should be able to expect a response to a complaint within a prescribed period in line with gas customers.

4.96. A summary of this proposed GSS is detailed in Table 3.

Existing Guaranteed Standard of Service

4.97. No equivalent standard in Northern Ireland.

Proposed Guaranteed Standard of Service

4.98. This provision would apply where the Electricity Distributor or Electricity Supplier receives from or on behalf of a customer, in their capacity as such, a verbal complaint (by use of a telephone number) or written complaint relating to its activities to which the Electricity Distributor or Electricity Supplier reasonably expects the customer will anticipate a response.

4.99. We propose that the Electricity Distributor should provide a response to verbal or written complaint from customers within 10 days, and to provide a substantive response within 20 days. We also propose that the Electricity Supplier, to ensure consistency with the Supplier Codes of Practice should provide a response to a verbal or written complaint from customers within 5 days.

Non- payment Proposed Guaranteed Standards of Service

4.100. The following two proposed GSS, (1) Timing of notification and (2) Notice of rights, have no compensation payment attached to them. These two GSS relate to operation timeframes in dealing with customer's queries and the distribution of prescribed information to consumers on a routine basis. As such, they are not individual Standards of Performance and therefore do not have compensation payments for customers attached to them.

4.101. The UR believes that these GSS are of benefit to the Electricity Distributor, Suppliers and customers. The Timing of notification GSS will ensure that Electricity Distributors and Electricity Suppliers are given adequate time to respond to Meter disputes. In regards to the second GSS, that of Notice of rights, the UR considers that the sending out of all information to consumers at the same time is the most efficient and effective method of providing customers with the full details of their rights.

These two GSS are both included in the Gas GSS. The UR proposes to include them in the Electricity GSS. As these GSS will be put in place post the publication of the Energy Supplier Codes of Practice, we would ask that Electricity Suppliers ensure that these Regulations are captured in their existing Codes of Practice.

Timing of notification

4.102. This GSS is in force in the existing electricity GSS Regulations in NI to ensure that where a notification of a Meter dispute is made after 4pm, it can be treated as being received by the Electricity Distributor the following working day.

4.103. We propose to extend this provision to also cover Electricity Suppliers; ensuring that both the Suppliers and Distributor have adequate time to respond.

Existing Regulations

4.105. Regulation 15 of the existing GSS Regulations in NI provides that for the purposes of Regulations on Providing a Supply, Estimate of charges, Voltage complaints, Meter disputes and Charges and payments, where NIE Networks receives notification of these Regulations after 4pm on a working day or at any time on any other day, they shall be deemed to have been satisfied on the next following working day.

Proposed Guaranteed Standard of Service

4.106. We propose that for the purpose of GSS relating to Providing a Supply, Estimate of charges, Voltage complaints, Charges and payments and Meter disputes, where the notification of the requirements of these Regulations are satisfied after 4pm on a working day or at any time on any other day, they are deemed to have been satisfied on the next following working day.

Notice of rights

4.107. The UR wishes to include a Regulation on the information that Electricity Suppliers share with customers in regards to certain GSS and also on the information that the Electricity Distributor shares with Electricity Suppliers in regards to certain GSS.

Existing Regulations

4.108. Regulation 11 of the existing electricity GSS requires that NIE Networks prepares and from time to time revises a statement describing customer rights in relation to GSS and the Overall Standards of Performance (OSS), in a form and having a content which could be reasonably understood by customers. NIE Networks is required to:-

(a) give a copy of the statement, and of any revision of the statement to the Utility Regulator and the Consumer Council before making it available to customers;

(b) at least once in any period of 12 months dispatch to each tariff customer a copy of the statement (in the form current at the time it is

provided), provided that where in relation to any premises more than one person is a tariff customer, the obligation shall be satisfied by dispatching a copy to any one of them;

(c) make a copy of the statement (in its current form) available for inspection by any person at any premises of or occupied by the supplier open to customers in the normal course of the business during the normal opening hours of the premises; and

(d) dispatch a copy of the statement (in its current form) to any person who requests it.

4.109. The Regulation provides that NIE Networks may prepare a separate statement for domestic and non-domestic customers and satisfy their obligation under sub-paragraph (b) or (d) of paragraph (1) by dispatching the statement appropriate to the class of customer to whom it is dispatched.

Proposed Guaranteed Standard of Service for Electricity Suppliers and Electricity Distributor

4.110. We propose that the Electricity Supplier, for domestic customers, shall prepare and from time to time revise a statement describing the domestic customer's rights and benefits in regards to the following GSS:

- Meter disputes
- Prepayment meters
- Appointments
- Complaints
- Charges and payments
- Disputes
- Payments
- Exemptions
- Timing of notification.

4.111. The content of this statement should be such that the Electricity Supplier thinks it reasonable for a domestic customer to understand. A Supplier should:-:

- (a) Give a copy of the statement, and any revisions of the statement, to the Utility Regulator and to the Consumer Council before the statement is made available to the domestic customer;
- (b) Make a copy available to each domestic customer by appropriate means;
- (c) Make a copy available for inspection by any person at any premises which is occupied by the Electricity Supplier which is open to the public during normal business hours;
- (d) Make a copy available by appropriate means to any person who requests it and
- (e) At least once in any period of 12 months, make available by appropriate means to each customer of the Electricity Supplier the information in any statement which has been sent to the Electricity Supplier by the Electricity Distributor.

4.112. We also propose that the Electricity Distributor, for Electricity Suppliers, shall prepare and from time to time revise a statement describing the customer's rights and benefits in regards to the following GSS :

- Meter disputes
- Metering errors
- Prepayment meters
- Appointments
- Supply restoration
- Notice of planned interruptions
- Complaints
- Disputes
- Payments
- Exemptions
- Distributor's fuse
- Voltage complaint
- Timing of notification.

4.113. The content of this statement should be such that the Electricity Distributor thinks it is within the understanding of the customers to whom the statement relates. We propose that the Distributor should:-:

- (a) Give a copy of the statement, and of any revision to the Authority and to the Consumer Council before it is given to Electricity Suppliers;
- (b) At least once in any period of 12 months send out to each Electricity Supplier which supplies Electricity to customers connected to the Electricity Distributors system, a copy of the statement for the Electricity Supplier to make available by appropriate means to the Electricity Suppliers customers;
- (c) Make a copy of the statement available for inspection by any person at any premises occupied by the Electricity Distributor which is open to the public during normal business hours; and
- (d) Make available by appropriate means a copy of the statement to any person who requests it.

4.114. The UR recognises that it is the Electricity Supplier, rather than the Electricity Distributor, who has the direct relationship with the customer and so it is more appropriate that the Supplier provide a copy of the statement to customers.

Reporting

4.115. With the new regime we want to ensure that all payments made under the new Regulations are reported on annually (including goodwill payments) so that we have a measurable marker of performance. Annual reporting for Distributors will be completed within the Regulatory Instruction and Guidance (RIGS) templates. Annual reporting for Suppliers will be completed within the Retail Energy Market Monitoring (REMM) templates in line with reporting for gas Supply GSS. As stated previously, engagement is still ongoing with industry as to the appropriate level of disclosure of REMM data. Once a clear direction has been agreed; a decision will be taken on the appropriateness of any publication of data.

4.116. We would expect that all GSS payments made to customers are reported on, together with any ex-gratia payments made. We would also expect that NIE Networks report on how long it takes them to restore supply. We would like to receive information on both the supply restoration periods of 12 and 18 hours from the beginning of the RP6 Price Control period. These new reporting provisions may require a modification to NIE Networks' Distribution Licence.

4.117. In the interests of transparency we plan to publish figures on company performance under the GSS regime on our website www.uregni.gov.uk.

Exemptions

4.118. We intend to include exemptions similar to those in the current GB Regulations⁴². Regulation 9 of the GB Regulations contains exemptions for the severe weather supply restoration standards and Regulation 20 contains general exemptions to the other provisions.

Notice of Rights

4.119. We propose that the Electricity Distributor prepares a statement showing customer rights under the GSS regime and provides this annually to the UR, the Consumer Council and to suppliers. A copy must also be available on the Electricity Distributor's website. In addition we propose that the Electricity Distributor provides annually to the UR, Consumer Council and customers, information on the Overall Standards of Performance by appropriate means.

4.120. We also propose that Electricity Suppliers prepare a statement showing customer rights under the GSS regime (including the information they have been sent by the Electricity Distributor) and provide this annually to the UR, the Consumer Council and to customers by appropriate means. No compensation payments would be attached to this provision.

4.121. This provision would reduce the burden on NIE Networks who are required by the existing electricity GSS Regulations to dispatch information on GSS annually to customers. As Suppliers have a more direct link to the customer, we consider that it is suitable for Suppliers to provide the Notice of Rights by appropriate means. This provision is further discussed in the Supplier GSS section of this paper.

⁴² Regulations 9 and 20 of The Electricity (Standards of Performance) Regulations 2015
http://www.legislation.gov.uk/uksi/2015/699/pdfs/uksi_20150699_en.pdf

Implications of this review

4.122. The UR recognises that the introduction of a new regime for electricity will cause a disparity between the Electricity GSS and the Gas GSS in terms of payment values, supply restoration and exemptions. This will be addressed by the UR in a separate workstream.

4.123. We also are aware that separate Regulations GSS exist for connections in GB. The UR currently has an active workstream⁴³ to consider a connections policy for NI, within which any GSS for connections will be considered.

4.124. The UR also considers there to be a future need to review and revise the GSS regime, as and when required, to reflect changes in the regulatory environment.

4.125. The UR does not propose to provide a regulatory allowance or incentive mechanism for electricity companies to cover the cost of implementing a revised GSS regime. The UR is of the view that it would not be appropriate, nor incentivise company performance if customers ultimately had to fund a scheme for service underperformance.

Implementation

4.126. We will be working with the Department for the Economy to enact the new Regulations. NIE Networks next Price Control, RP6 will commence in October 2017 for a six and a half year period. We do not envisage that new Regulations would be in place by the beginning of the RP6 Price Control Period but at some stage within its duration.

⁴³ <https://www.uregni.gov.uk/consultations/electricity-connections-consultation>

Table 3 - Proposed new GSS standards

Standard	Existing	Proposed
Distributor's fuse	<p>Distribution Company to replace a faulty main fuse within 3 hours on a working day, or 4 hours on any other day.</p> <p>£25 compensation if not achieved.</p> <p>(Regulation 3)</p>	<p>Distribution Company to replace a faulty main fuse within 3 hours on a working day, or 4 hours on any other day.</p> <p>£30 compensation if not achieved.</p>
Restoration of supply (Normal Conditions)	<p>Distribution Company to restore electricity supplies following a fault on the network, within 24 hours.</p> <p>£50 compensation if not achieved; £25 for every subsequent 12 hour period.</p> <p>(Regulation 4)</p>	<p>Distribution Company to restore electricity supplies following a fault on the network, within 18 hours.</p> <p>£75 compensation for domestic customers (£150 for non domestic customers) if not achieved; £35 for every subsequent 12 hour period.</p>
Restoration of supply (Normal Conditions with more than 5,000 customers affected)	<p>No equivalent standard in NI</p>	<p>Distribution Company to restore electricity supplies following a fault on the network, within 24 hours.</p> <p>£75 compensation for domestic customers (£150 for non domestic customers) if not achieved; £35 for every subsequent 12 hour period.</p> <p>Maximum payment capped at £300.</p>
Restoration of supply (Severe Weather Conditions)	<p>Current exemption provided in Regulation 14 to the GSS requirements during a severe weather event.</p>	<p>Severe Weather</p> <p>Category 1 (medium events)</p> <p>Lightning events – where there are at least 8 times the daily average amount</p>

Standard	Existing	Proposed
		<p>of faults in a 24 hour period affecting less than the category 3 threshold number ⁴⁴of customers– supply to be restored within 24-hours.</p> <p>Non-lightning events– where there are between 8 and 13 times the daily average amount of faults in a 24 hour period affecting less than the category 3 threshold number of customers – supply to be restored within 24 hours.</p> <p>Category 2 (large events)</p> <p>Non – lightening events - where there are at least 13 times the daily average amount of faults in a 24 hour period affecting less than the category 3 threshold number of customers – supply to be restored within 48 hours.</p> <p>Category 3 (very large events)</p> <p>All severe weather events – supply to be restored in a period as calculated by the following formula:-</p> $48 \times \left(\frac{\text{total number of customers interrupted}}{\text{category 3 threshold number of customers}} \right)^2$ <p>Payment:- Distribution company to pay £70 compensation if not achieved; £70 for every subsequent 12 hour period. Maximum payment capped at £700.</p>

⁴⁴ In GB each designated electricity distributor has its own threshold number of customers specified in the table in Schedule 2 of the 2015 GB Regulations. This table has been provided in Annex 1.

Standard	Existing	Proposed
Providing a supply	<p>Making an appointment to install a meter and turning on supply within 2 working days (domestic) or 4 working days (non-domestic)</p> <p>Or keeping an appointment for the above purpose</p> <p>£50 compensation for domestic customers</p> <p>£125 for non-domestic</p> <p>(Regulation 5)</p>	<p>Retaining current standard</p> <p>Making an appointment to install a meter and turning on supply within 2 working days (domestic) or 4 working days (non-domestic)</p> <p>Or keeping an appointment for the above purpose</p> <p>£50 compensation for domestic customers</p> <p>£125 for non-domestic</p>
Estimate of charges	<p>Providing a cost estimate for a new electricity supply within 7 working days (small jobs) or 15 working days (larger jobs)</p> <p>Compensation payment £50</p> <p>(Regulation 6)</p>	<p>Retaining current standard</p> <p>Providing a cost estimate for a new electricity supply within 7 working days (small jobs) or 15 working days (larger jobs)</p> <p>Compensation payment £50</p>
Notice of supply interruption	<p>Distribution Company to give 3 days prior notice of supply interruption.</p> <p>£25 compensation for domestic customers (£50 for non domestic customers) if not achieved.</p> <p>(Regulation7)</p>	<p>Distribution Company to give 3 days prior notice of supply interruption.</p> <p>£30 compensation for domestic customers (£60 for non domestic customers) if not achieved.</p>
Voltage	Distribution Company to	Distribution Company to explain what

Standard	Existing	Proposed
<p>Complaints</p>	<p>explain what will be done to resolve a voltage problem within 5 days of it being notified; or if a site visit is needed to investigate, to do so within 7 days.</p> <p>£25 compensation if not achieved.</p> <p>(Regulation 8)</p>	<p>will be done to resolve a voltage problem within 5 days of it being notified; or if a site visit is needed to investigate, to do so within 7 days.</p> <p>£30 compensation if not achieved.</p>
<p>Meter disputes</p>	<p>Once notified, Distribution Company must offer an appointment within 7 working days or offer an explanation within 5 working days if a visit is not required.</p> <p>£25 compensation if not achieved.</p> <p>(Regulation 8A)</p>	<p>Once notified, Distribution Company must offer an appointment within 7 working days or offer an explanation within 5 working days if a visit is not required.</p> <p>Where a customer informs their Supplier of an issue, the Supplier must report this to the distribution company with 1 working day.</p> <p>£30 compensation if not achieved.</p>
<p>Prepayment meters</p>	<p>Distribution Company to deal with a problem with a customer's pre-payment meter within 3 hours during a working day and 4 hours on any other day</p> <p>(£25 compensation if not achieved)</p> <p>(Regulation 8B)</p>	<p>Distribution Company to deal with a problem with a customer's pre-payment meter within 3 hours during a working day and 4 hours on any other day</p> <p>Where a customer informs their Supplier of an issue, the Supplier must report this to the distribution company within 4 hours.</p>

Standard	Existing	Proposed
		£30 compensation if not achieved.
Metering Errors	No equivalent standard in NI	<p>Where a customer is billed an incorrect amount by their Electricity Supplier as a result of the Supplier calculating the amount billed by reference to an incorrect meter reading or incorrect meter calibration caused by an error by the relevant Electricity Distributor.</p> <p>£30 compensation paid by the Distributor when this is applicable.</p>
Charges and payments	<p>Distribution company to address a query regarding payments due under guaranteed standards within 5 working days, and if payment is due to do so within 5 working days.</p> <p>£25 compensation if not achieved.</p> <p>(Regulation 9)</p>	<p>Supply company to respond to a request to change payment method or an account query (as to the correctness of the account or a GSS payment due) within 5 working days.</p> <p>Distribution company to address a query regarding payments due under guaranteed standards within 5 working days.</p> <p>GSS payments which have been queried should be made by the Distributor or Supplier within 5 days.</p> <p>£30 compensation if not achieved.</p>
Appointments	<p>Distribution company to offer a timed appointment for visits to customer premises between 8.30am and 1pm, or 12 noon and 5pm.</p> <p>£25 compensation if appointment is not kept.</p>	<p>Distribution or supply company to offer a timed appointment for visits to customer premises between 8.30am and 1pm, or 12 noon and 5pm.</p> <p>£30 compensation if appointment is not kept.</p>

Standard	Existing	Proposed
	(Regulation 10)	
Payments	<p>Distribution company to make payments due when they have failed to meet the guaranteed standards, within 10 working days.</p> <p>£25 compensation if not achieved.</p> <p>(Regulation 13)</p>	<p>Distribution company to make payments due when they have failed to meet the guaranteed standards, within 10 working days.</p> <p>£30 compensation if not achieved.</p> <p>Supply company to make payments due when they have failed to meet the guaranteed standards, within 10 working days.</p> <p>£30 compensation if not achieved.</p>
Complaints	No equivalent standard in NI	<p>Distribution or supply company to provide a response to verbal or written complaints from customers within 10 days, and to provide a substantive response within 20 days</p> <p>£30 compensation if not achieved</p>
Multiple Disconnections	No equivalent standard in NI	<p>GB standard –Distribution company to pay compensation to customers who experience interruptions lasting 3 hours or more, on 4 or more occasions in a 12 month period starting on 1 April.</p> <p>£75 compensation when this is applicable.</p>
Rota Disconnections	No equivalent standard in NI	GB standard - Distribution company to pay compensation to customers whose supply is interrupted on a rota basis, in

Standard	Existing	Proposed
		<p>order to share the available load when there are supply shortages.</p> <p>£75 compensation for domestic customers (£150 for non domestic customers) when this is applicable.</p>

5. Next Steps

5.1. This Consultation in relation to GSS will inform subsequent work streams in this area. All response documentation must be received by **5.00pm** on **Wednesday 31st May 2017** for consideration. The UR will review evidence provided in response to this Consultation and, dependent upon responses received, it will subsequently issue a next steps paper which will set out the approach we will take.

5.2. Any changes to the above procedures may depend on the assessment of information provided in this consultation on draft GSS strategy.

5.3. As legislative changes will be required to bring the new GSS regime into effect, we will work with the Department for the Economy to make the regulations.

5.4. Table 3 below shows a summary of the activities the UR will undertake and an indication of the timeframes for completion.

Table 3 – Proposed timeframes

Activity	Description	Timing
Consultation	<ul style="list-style-type: none"> • Receive responses to consultation 	Q2 2017
	<ul style="list-style-type: none"> • Proposed Decision Paper 	Q3 2017
	<ul style="list-style-type: none"> • Final responses from stakeholders 	Q3 2017
Conclusion	Next Steps Paper published	Q3 2017

6. Responding to this consultation

Equality Considerations

6.1. As a public authority, the UR has a number of obligations arising from Section 75 of the Northern Ireland Act 1998. These obligations concern the promotion of equality of opportunity between:

- persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- men and women generally;
- persons with disability and persons without; and
- persons with dependants and persons without.

6.2. The UR must also have regard to the promotion of good relations between persons of different religious belief, political opinion or racial groups.

6.3. In the development of its policies the UR also has a statutory duty to have due regard to the needs of vulnerable customers i.e. individuals who are disabled or chronically sick, individuals of pensionable age, individuals with low incomes and individuals residing in rural areas. Some of the above equality categories will therefore overlap with these vulnerable groupings.

6.4. In order to assist with equality screening of the proposals contained within this second consultation paper, the UR requests that respondents provide any information or evidence in relation to the needs, experiences, issues and priorities for different groups which they consider is relevant to the implementation of any of the updated proposals. Furthermore, the UR welcomes any comments which respondents might have in relation to the overall equality impact of the proposals.

6.5. This paper is available in alternative formats such as audio, Braille etc. If an alternative format is required, please contact us and we will be happy to assist.

Questionnaire completion

- 6.6. The first sheet in the questionnaire spreadsheet collates details about you and your position in relation to any GSS approach.
- 6.7. We have identified a number of areas that would benefit from consideration as part of this review and which could assist the UR in deciding how to revise the GSS. We have outlined 21 questions in the second tab of the spreadsheet. Please answer these questions where applicable. If any questions are unanswered, they will be assumed to be not applicable to the respondent.
- 6.8. Alongside the questions is a column that asks the respondent to indicate whether their response can be published by the UR. Please indicate whether you consider that part, or all, of your response should be treated as confidential, with any relevant explanation.
- 6.9. In addition to the questionnaire questions we also welcome any additional views and evidence that respondents consider should be taken into account in this review. We request that respondents include this information within the 'Additional relevant factors' section of the questionnaire.
- 6.10. The UR welcomes responses to this Consultation by **5.00pm on Wednesday 31st May 2017**. It is our preference that responses are sent by email where possible. Responses should be sent to:

Laura Kane
The Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED
Email: Laura.Kane@uregni.gov.uk
Tel: 028 9031 6357
Or Electricity_Networks_Responses@uregni.gov.uk

6.11. The UR will seek to publish all responses to this Consultation on the UREGNI website. If part of your response is confidential, it would be helpful if you could also submit a non-confidential version of your response redacting all confidential information.

6.12. As a public body and non-ministerial government department, the UR is required to comply with the Freedom of Information Act (FOIA). The effect of FOIA may be that certain recorded information contained in consultation responses is required to be put into the public domain. Hence it is now possible that all responses made to consultations will be discoverable under FOIA, even if respondents ask us to treat responses as confidential. It is therefore important that respondents take account of this and in particular, if asking the Authority to treat responses as confidential, should specify why they consider the information in question should be treated as such.

7. Appendices

Appendix 1 – Summary of The Electricity (Standards of Performance) Regulations Northern Ireland 1993 (subject to exemptions)

Standard reference	Standard	Timescale	Payment Due on Default
Distributors fuse (Regulation 3)	Replacing customer's main fuse	3 hours during a working day 4 hours on any other day	£25
Restoration of supply (Regulation 4)	Restoring electricity following a fault	24 hours	£50 (domestic) £125 (non-domestic) extra £25 for every 12 hrs electricity stays off after first 24hrs
Providing a supply (Regulation 5)	Making an appointment to install a meter and turning on supply Keeping an appointment for the above purpose	2 working days (domestic) 4 working days (non-domestic)	£50 domestic £125 non-domestic £25
Estimate of charges (Regulation 6)	Providing a cost estimate for a new electricity supply	7 working days (small jobs) 15 working days (larger jobs)	£50
Notice of supply interruption (Regulation 7)	Notifying a customer of a planned interruption in your electricity supply	3 days	£25 (domestic) £50 (non-domestic)
Voltage Complaint (Regulation 8)	Dealing with a complaint about electricity voltage	7 working days to make an appointment 5 working days to offer an explanation if a visit is not required	£25 £25 appointment not kept

Meter disputes (Regulation 8A)	Meter accuracy queries	7 working days to make an appointment 5 working days to offer an explanation if a visit is not required	£25 £25 (appointment not kept)
Charges and payments (Regulation 9)	Responding to queries about GSS payments or making a GSS payment where due	5 working days 5 working days to make a payment if this is due	£25
Appointments (Regulation 10)	Keeping an appointment	AM (8.30am – 1.00pm) or PM (12 noon – 5.00pm)	£25
Payments (Regulation 13)	Making payments due under GSS	10 working days	£25
Prepayment meters (Regulation 8B)	Dealing with a problem with your pre- payment meter	3 hours during a working day 4 hours on any other day	£25

Appendix 2 – Northern Ireland Electricity Networks Limited Overall Standards of Performance⁴⁵

Turning your power back on	We aim to reconnect 87% of customers affected by a power cut, due to a fault on our distribution system, within 3 hours and all customers within 24 hours.
Putting voltage issues right	We will correct known voltage issues outside the stated limits within 6 months, subject to any agreement needed from landowners.
Getting a new supply of electricity	We will complete all new low voltage connections for domestic customers within 30 working days or within 40 working days for non-domestic customers once the terms of the connection have been accepted.
Getting you back on if you were cut off (due to debt)	Once you have made an agreement with your supplier and they let us know, we will get your electricity back on within 24 hours of a working day.
Moving a meter	We will reposition your meter on your meter board within 15 working days of our quotation being accepted.
Changing your meter if you change your tariff	If your new tariff needs a new meter installed at your home, we will change the meter within 10 working days of being notified by your supplier.
Reading your meter	We aim to get a meter reading for 99.5% of customers once a year.
Replying to your letters	We will reply to you within 10 working days.

⁴⁵ Source – <http://www.nienetworks.co.uk/help-advice/customer-standards/overall-standards>

Appendix 3 – Summary of The Electricity (Standards of Performance) Regulations 2015 (subject to exemptions)⁴⁶

Standard reference	Standard	Timescale	Payment Due on Default
Supply Restoration Normal Weather Conditions (Regulation 5)	Restoring electricity supply following a fault	12 hours	£35
Supply Restoration Normal Weather Conditions with >5000 customers affected (Regulation 6)	Restoring electricity supply following a fault	24 hours	£75 (domestic) £150 (non-domestic) (extra £35 for every 12 hrs electricity stays off after first 24hrs) £300 cap on total compensation payments
Supply Restoration Severe weather conditions (Regulation 7)	Restoring electricity supply following a fault caused by severe weather	Category 1- 24 hours Category 2 -48 hours Category 3 - Determined by formula in Regulation 7(6) ⁴⁷	£70 (extra £70 for each additional 12 hours off supply) £700 cap on total compensation payments
Supply Restoration (Rota disconnection) Regulation 8	Restoring electricity supply after a rota disconnection (where demand needs to be reduced to match capacity)	24 hours	£75 (domestic) £150 (non-domestic)
Supply Restoration (Multiple Interruptions) Regulation 10	Providing a GSS payment where there have been multiple supply interruptions in one year	Where there have been 4 or more supply interruptions in one year, each lasting longer than 3 hours	£75
Distributor's fuse	Replacing the main fuse	Working days – within 3 hours	£30

⁴⁶ These Regulations were amended to remove the supplier elements which are now included in the Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015

http://www.legislation.gov.uk/uksi/2015/1544/pdfs/uksi_20151544_en.pdf

⁴⁷ <http://www.legislation.gov.uk/uksi/2015/699/regulation/7/made>

(Regulation 11)		4 hours on any other day	
Notice of Supply interruption (Regulation 12)	Prior notice of supply interruption	At least 2 days notice	£30 domestic £60 non domestic
Voltage complaints (Regulation 13)	Responding to a complaint about voltage	Visit to be arranged within 7 days or if visit not required, written response within 5 days	£30
Appointments (Regulation 17)	Offering a timed appointment if relevant operator is a distributor Keeping a timed appointment (a time specified either AM/PM, or a two hour window, or a part of the day requested by the customer agreed by the distributor)	Within a reasonable period	£30 £22
Payments (Regulation 19)	Making standard payments	10 working days (or as soon as is reasonably practicable in severe weather)	£30

Appendix 4 – Summary of The Gas (Individual Standards of Performance) Regulations (Northern Ireland) 2014 (subject to exemptions)

Standard reference	Standard	Timescale	Payment Due on Default
Meter Disputes (Regulation 3)	Distribution companies must provide an explanation on the probable cause of any meter accuracy issues	Within 15 working days	£25 (paid by distribution company)
	If an appointment is necessary, the distribution company must offer this to investigate	Within seven working days	£25 (paid by distribution company)
	Where a customer informs their supplier of an issue, the supplier must report this to the distribution company	Within one working day	£25 (paid by supplier)
Meter mix-ups (Regulation 4)	Distribution companies must ensure that customers are not billed erroneously due to a wrongly assigned meter		£50 (paid by distribution company)
Pre-payment meters (Regulation 5)	Distribution companies dealing with reports of problems with prepayment meters within four working hours.	Within 4 hours	£25 (domestic only paid by distribution company)
	Where a customer informs their supplier of a problem with a prepayment meter, the supplier must notify the distribution company of any report of the problem	Within 4 hours	£25 (domestic only paid by supply company)

Appointments (Regulation 6)	Distribution and supply companies must offer and keep an appointment within a maximum two hour time band, or if acceptable to the customer an appointment within the time bands	Timebands 8.30-13.00 or 12.00-17.00.	£25 paid by supplier or distribution company (domestic customers only)
Supply Restoration (Regulation 7)	Distribution companies must restore supply to a customer whose gas supply has been discontinued as a result of a failure of, fault in or damage to the pipe-line system	Within 24 hours	£50 for initial 24 hours to be paid by distribution company plus £25 for each additional 24 hour period up to £1000 for domestic customers £125 for initial 24 hours up to £1,000 plus £25 for each additional 24 hour period for non domestic customers
Reinstatement of customer's premises (Regulation 8)	Distribution companies must reinstate customer premises following work to a service pipe and any associated work to a distribution main where the pipe or main lies under or within the premises of a customer	Within 5 working days	£50 paid by distribution company (plus additional £25 per subsequent 5 working days up to £1000 for domestic customers £100 paid by distribution company (plus additional £25 per subsequent 5 working days up to £1000 for domestic customers)
Connections (Regulation 9)	Distribution companies to provide customers	Within 10 working days for standard	£50 plus £50 for each additional working day up to

	with a cost estimate for a new gas supply or alteration to an existing one	28 days for non-standard work.	£250 for existing connections up to and including 275kWh per hour and up to £500 for connections over 275kWh per hour paid by distribution company
Notice of planned interruption (Regulation 10)	Distribution companies must give notice to customers whose supply will be interrupted by planned maintenance or replacement work to the pipe-line system	At least 3 days notice	£25 for domestic customers £50 for non domestic paid by distribution company
Responding to complaints (Regulation 11)	Supply companies must provide an initial response Substantive response	Within 10 working days Within 20 working days	£25 £25 (Paid by distribution or supply company)
Charges and Payments (Regulation 12)	Supply companies must deal with customer queries about their bill or standard payments, or change in payment method	Within 5 working days	£25 (Paid by supply company)
Making Standard Payments (Regulation 14)	Distribution or supply companies which fail to provide entitled customers with their standard payments within the prescribed timeframes must make an additional payment	Within 20 working days for payments from distributor to customer, or 10 working days where supply/distribution company receives a payment for onward transmission to a customer	£25 (Paid by distribution or supply company)

8. Glossary and Acronyms

For the purposes of this paper, please find below a list of terms and acronyms and associated explanations.

CCNI	Consumer Council for Northern Ireland
Common Services Model	Electricity metering services are all performed as part of the common services included in NIE Networks licence. These common services include meter operations, data collection, processing and registration.
Critical Care Register	Northern Ireland Electricity Networks (NIE Networks), offer a critical care information service to customers who are dependent on life supporting electrical equipment. Being on the register means customers will receive up to date information by phone during a power cut or a planned interruption of electricity supply.
Distributor's fuse	This is the fusible cut-out or automatic switching device of the electricity distributor for disconnecting the supply to the customer's premises.
DNO	Distribution Network Operator
Electricity Distributor	Refers to any company with a licence to distribute electricity in Northern Ireland, namely Northern Ireland Electricity Networks.
Electricity Supplier	Refers to any company with a licence to supply electricity in Northern Ireland.
Existing Northern Ireland Regulations	Electricity (Standards of Performance) Regulations (Northern Ireland) 1993
FOIA	Freedom of Information Act 2000
GB	Great Britain

GSS	Guaranteed Standards of Service
Gas GSS	Gas (Individual Standards of Performance) Regulations (Northern Ireland) 2014
MW	Mega Watts
NEA	National Energy Action
NI	Northern Ireland
NIE Networks	Northern Ireland Electricity Networks Limited
Ofgem	Office of Gas and Electricity Markets
OSS	Overall Standards of Performance
Priority Services Register	Register maintained in Great Britain by suppliers and network operators providing additional services for customers who are of pensionable age; are disabled or chronically sick; have a long-term medical condition; have a hearing or visual impairment or additional communication needs; are in a vulnerable situation.
Relevant Operator	Means the relevant supplier or, as the case may be, the relevant electricity distributor
REMM	Retail Energy Market Monitoring (UR Internal)
RIGGS	Regulatory Instruction and Guidance Templates
RP6	NIE Network's Price Control Regulatory Period 6 (Running from 1 October 2017 onwards until 31 March 2024)
SEM	Single Electricity Market
SLA	Service Level Agreement
SME's	Small and Medium Sized Enterprises
UR	Utility Regulator