



AIRTRICITY RESPONSE TO  
DETI CONSULTATION ON IMPLEMENTATION OF  
ELECTRICITY AND GAS METERING AND BILLING  
PROVISIONS OF THE ENERGY EFFICIENCY DIRECTIVE

23<sup>RD</sup> DECEMBER 2013

## INTRODUCTION

Airtricity welcomes the opportunity to comment on DETI's Consultation on Implementation of Electricity and Gas Metering and Billing Provisions of the Energy Efficiency Directive (2012/27/EU).

## GENERAL COMMENTS

Airtricity welcomes this consultation by DETI on the Implementation of the Energy Efficiency Directive in Northern Ireland. Airtricity's main consideration in implementing the Directive is to ensure that costs are kept to a minimum for customers, and that obligations under the Directive are met in the most cost efficient manner. In particular, with electricity smart metering rollout programme and gas smart metering CBA to be completed in the coming years, we consider that investment in current metering and billing infrastructure will not present value for money, and should only be pursued where, and to the extent, absolutely necessary for compliance with the Directive. All efforts should be made to eliminate duplication of effort and costs that could arise due to cross over between this and the imminent Smart Metering initiative.

In a number of areas suppliers are already compliant with the requirements of the Directive, although this may not be explicit in licence conditions. Where this is the case, if licence conditions are to be amended, this should not result in a requirement to change existing compliant practices.

We would also note that where implementation increases costs then this will have to be reviewed for all of our supply businesses, particularly our regulated Airtricity Gas Supply Northern Ireland business. Suppliers are not in a position to absorb these costs and it will unfortunately be necessary to pass any costs arising through to customers. We would highlight that there have been many licence changes over the last few years and each of these imposes costs on customers; these changes should be kept to a minimum.

In respect of the Energy Efficiency provisions of the Directive, we consider that there is value in the compilation of advice and information by an independent agency, which suppliers could refer consumers to.

## CONSULTATION QUESTIONS

### Section 2 - Metering

- a) *Do you agree that the current legislative provisions and licence conditions are **not** sufficient to ensure compliance with Article 9(1)? If you disagree, please ensure that you explain your answer fully.*

Airtricity believes that current metering arrangements are sufficient in order to meet the requirements of the Directive. If it is decided that licence conditions should be changed, it must be ensured that no change to current practice is required. We highlight that in NI metering is a regulated monopoly, which may not be the case in other jurisdictions, we therefore consider that the competitively priced criterion should be satisfied by the scrutiny of metering costs under the DSOs' price controls and that current recording of usage is adequate. Where DETI considers that amendments must be made to ensure compliance with the specific provisions of the Directive, Airtricity would point out that with the advent of smart metering it would not be financially reasonable and proportionate to change metering requirements in relation to energy efficiency savings, as these meters will be replaced in a few years. Airtricity does not see how credit meters could be seen to fail to comply with this requirement.

If DETI believes it is necessary to amend licence conditions in order to transpose this Article it seems to Airtricity that the DSO licences would be the only licences affected.

In the calculation of costs for this purpose, the costs to all stakeholders, including electricity suppliers as well as DSO infrastructure, software and process costs, should be borne in mind as these will ultimately be passed on to customers.

*b) What other issues, if any, would arise from the proposal to put in place legislation to ensure that the requirements of Article 9(1) are met in full?*

No comment – Airtricity considers that current practice is sufficient and should be retained.

*c) What are the implications, if any, arising from including requirements on metering to those currently exempt from holding an electricity supply licence?*

No comment.

*d) What costs and benefits might arise from putting in place additional requirements in relation to gas and electricity metering.*

Requiring changes to electricity and gas metering would impose great expense on electricity and gas customers, ranging from the extreme case of requiring replacement of meters to changes in processes, software and meter reading processes. Airtricity considers that current technology and

practices satisfy the Directive and considers that if any issues are identified that they should be considered as part of the smart metering programme. As customers are already informed of actual usage there would be little benefit to requiring a change at this time.

### **Section 3 – Smart Metering and Billing**

*a) What issues arise or might arise from implementation of the requirements of the Energy Efficiency Directive in relation to electricity and gas smart meters?*

Airtricity accepts that the rollout of smart metering will have to comply with the provisions of the Energy Efficiency Directive, these questions must be considered in the Smart Metering programme. We are somewhat concerned with the timing issue of transposing these provisions before the smart metering rollout programme has been designed. If this is to happen, we would advocate that the provisions be transposed in as flexible a manner as possible so as not to preclude any design options at this stage. In particular, presumptions should not be made as to which parties will carry out which duties under the Directive; suppliers are particularly worried about requirements to share customer data under Article 9(2)(d) from a data protection and costs perspective, as discussed further below.

Airtricity notes that new rules around Data Protection will require consideration in respect of implementing Article 9(2)(b), including the granularity of information available to suppliers themselves, and that the requirement to provide advice under sub-paragraph (e) must be proportionate and centralised where possible. In order to mitigate data protection risks and reduce costs, Airtricity argues that under Article (9(2)(d) it should only be required to provide metering data on electricity input and off-take to customers themselves, and that it should not be required to provide this to third parties.

*b) What are the potential cost implications and benefits of implementing the requirement of the Energy Efficiency Directive in relation to smart metering and billing?*

Airtricity considers that as the method of implementation will be considered in the electricity smart metering rollout programme and gas smart metering CBA that costs and benefits should be considered at that stage. Maximum flexibility should be left in transposition to allow for the design decisions of the rollout programme to be adopted.

Not until such time that a comprehensive CBA is completed can any benefits be suggested and evaluated. If Suppliers are obligated to implement changes now that by any reasonable logic belong under the auspices of the

Smart Metering programme, we would expect that the costs will be great and the CBA for the Smart Metering programme could be significantly negatively impacted.

## **Section 4 – Billing Information**

### **4.1 Consultation Questions on Article 10(1)**

*a) What issues arise from the proposal to put in place legislation to support the supply licence conditions to meet the requirements set out in paragraph 4.10?*

Airtricity has no concerns with the proposal to require suppliers to provide billpay customers with twice yearly billing information, and existing obligations on meter readings fulfil the requirement for billing based on actual consumption once per year. It is our view that for PPM customers, the existing annual statement fulfils the requirement for billing based on actual consumption and that billing information available from meter display fulfils the remainder of the requirement. Thus current practice in NI is compliant. We note that it would be very expensive to require more frequent meter reads.

Airtricity encourages self-reads on our bills; we note that customer self-reads always make bills more accurate but due to billing cycles it will only be the case that a bill is based on absolute actual consumption where the reading is reported within a window of the next billing date. However, we do consider that current practice regarding self-reads is sufficient to meet the requirement for annual billing based on actual consumption.

Airtricity is concerned at the proposal that a requirement be included in licences that information on the energy billing and historical consumption of final customer is provided to energy service providers as well as suppliers. The first question in this respect is what party is proposed to be required to share this information. From a supplier point of view, the cost and privacy/data protection issues arising are significant. In our view this information belongs to the customer, and our relationship is with the customer. If suppliers are to be required to provide such information we believe it should therefore be to provide it to the customer, who can share it with other parties if they so choose. To mitigate obvious DP risks, many jurisdictions accept that a Supplier should only be obligated to supply data to the Consumer and NOT directly to 3rd parties. As we have no control over the data protection procedures of those third parties we are reticent to be involved in the exchange of information. The cost implications for suppliers to work out what information customers want to share with third parties (perhaps multiple parties), ensuring that customers consent to the sharing of that information (and dealing with situations where a customer

changes his/her mind and decides not to proceed with sharing information) and compiling the information to send to a third party should not be underestimated. In addition, a supplier will not have access to customer information pre-dating the commencement of switching to that supplier. We would foresee a large degree of time and resources spent on developing and administering such a process, both in terms of IT and manpower, and in dealing with queries and complaints (which should perhaps be directed at the third party); all of these costs will ultimately increase costs to customers. On this basis we consider that the proposal is not economically justified and is therefore not required to be implemented under Article 10(1). Airtricity considers that a better alternative would be for the DSO or suppliers to share this information directly with customers, who can then share it with third parties at their own discretion. If this requirement is to be introduced we consider that it would be more efficient to require the DSO to provide the information as only one systems/IT project would be required to compile the information for all customers, would ensure consistency and would enable a full history to be provided.

Arguably, in the interest of balance, if Suppliers were obligated to provide data directly to 3rd parties then the Customer will have to indemnify the supplier against any wrongdoing by the 3rd party. Future EU legislation relating to Data Protection is widely anticipated to include a “right to die” clause, i.e. the customer can instruct that all data pertaining to them be purged from a suppliers system. Given that it is already determined that interval data is ‘personal data’ and that the Supplier was the original “data gatherer and Data Processor” a legal conflict could arise as to who is responsible for requesting and validating that the 3rd party purged data in such a scenario. Other Smart Metering programmes have given strong weight to this argument in deciding that suppliers will only be obligated to provide data directly to their customer.

Airtricity already offers electricity customers the option of electronic billing information and believes there are many advantages to doing so. We would support the extension of this service to our natural gas customers, but this will require approval to recoup implementation costs under the Utility Regulator Price Control for Airtricity Gas Supply Northern Ireland. We note that this provision of the Directive relates to ‘final customers’ and consider that implementation should reflect this.

Airtricity believes that any requirement to comply with billing guidance introduced in the transposition of the Directive must be limited to guidance required in order to implement the provisions of the Directive. We consider that outside of the Directive, existing licence requirements are sufficient in this regard. We note as a general principle that the inclusion of unnecessary

information on bills is confusing for customers and imposes costs on suppliers, and thus customers.

We note that a deadline of 31st December 2014 is ambitious and depending on the transposition timeframe may not be realistically achievable.

*b) What are the particular issues connected with extending requirements to cover non-domestic customers?*

No particular issues

*c) What are the particular issues connected with these changes for keypad customers?*

Keypad customers currently receive an annual statement and meter read which we consider ensures compliance with the requirement for billing based on actual consumption annually. We consider that the requirement to provide billing information is fulfilled by the information available on meter displays. A requirement to produce twice yearly statements for keypad customers would significantly increase costs and we consider that such a provision would not be economically justified.

The smart metering project may enable cost effective options in this regard and Airtricity would advocate that no change be made pending smart metering rollout.

Estimated reads are not relevant to keypad customers.

The provision of energy billing and historic consumption information to energy service providers and suppliers for keypad customers presents the same issues as for other customers (outlined above).

*d) What costs and benefits might arise as a result of the proposed changes? Please give full details.*

As set out above, many of the potential changes would impose large costs on suppliers and thus customers. A full Cost Benefit Analysis would be required to fully assess the proposals.

#### **4.2 Consultation Questions on Article 10(3)(a)**

*a) What issues might arise from new or amended licence conditions requiring electricity and gas suppliers to provide the required information to an energy service company designated by the final customer?*

As discussed above, this requirement would have significant cost and privacy/data protection issues. We consider that it would increase costs for

customers, is not economically justified and is therefore not required by Article 10(1). Airtricity proposes that a preferable alternative is that this information is provided to customers, who can then share it with energy service companies. We note that this process could be built into the smart metering programme – if customers have ready access to their data they can then share it with third parties.

*b) What are the particular issues connected with these changes for keypad customers?*

The same issues apply.

*c) What are the particular issues connected with extending requirements to cover non-domestic customers?*

The same issues apply.

*d) Do you anticipate any additional costs or benefits arising as a result of the proposed modification? If so, please give as much detail as possible.*

It is not clear from the consultation who it would be proposed to place such a requirement on. From a supplier point of view, the cost and privacy/data protection issues arising if we were required to share this information are significant. In our view this information belongs to the customer, and our relationship is with the customer. If suppliers are to be required to provide such information we believe it should therefore be to provide it to the customer, who can share it with other parties if they so choose. As we have no control over the data protection procedures of those third parties we are reticent to be involved in the exchange of information with them. The cost implications for suppliers to work out what information customers want to share with third parties (perhaps multiple parties), ensuring that customers consent to the sharing of that information (and dealing with situations where a customer decides not to proceed with sharing information) and compiling the information to send to a third party should not be underestimated. In addition, a supplier will not have access to customer information pre-dating the commencement of switching to that supplier. We would foresee a large degree of time and resources spent on developing and administering such a process, both in terms of IT and manpower, and in dealing with queries and complaints (many of which may more properly be directed to the third party). All of these costs will ultimately increase costs to electricity and gas customers. On this basis we consider that the proposal is not economically justified and is therefore not required to be implemented under Article 10(1).



Airtricity considers that a better alternative would be for the DSO or suppliers to share this information directly with customers, who can then share it with third parties at their own discretion. If this requirement is to be introduced we consider that it would be more efficient to require the DSO to provide the information as only one systems/IT project would be required to compile the information. As mentioned above, the smart metering rollout programme may well give customers the facility to access their own data directly.

#### **4.3 Consultation Questions and Proposed Answers on 10(3)(b)**

*a) Do you think that the existing supply licence conditions outlined above are sufficient to ensure that final customers receive a clear and understandable explanation of how their bill was derived? If not, what more could be done to achieve this end? Please give details*

Airtricity considers that existing conditions are sufficient, and clearly set out the information needed by customers to understand how their bill has been calculated. We would note that changes to bill layout can confuse customers. Any changes to bill design or content is expensive and that it should be avoided as they will ultimately increase costs for customers. We note that design of bills and statements will be discussed in the smart metering programme and we would at least advocate that no change be made until that process has been completed and implemented.

*b) What issues arise from an obligation on suppliers to offer online billing services?*

We note that the Directive uses the expression 'electronic billing information'. Airtricity already offers electronic billing information to electricity customers and we have found that this service is attractive to many of our customers. We would support the extension of this service to our natural gas customers, but this will require approval to recoup implementation costs under the Utility Regulator Price Control for Airtricity Gas Supply Northern Ireland.

*c) What are the particular issues connected with these changes for keypad customers?*

No particular issues for these customers, Airtricity considers that current practice is sufficient to comply with the Directive.

*d) What are the particular issues connected with extending requirements to cover non-domestic customers?*

No particular issues.

*e) Do you anticipate any additional costs or benefits arising as a result of the proposed modification? If so, please give as much detail as possible.*

Introduction of electronic billing information systems does impose a cost on suppliers.

#### **4.4 Consultation Questions on Article 10(3)(d)**

- a) *Do you think that there are any exceptional circumstances that would necessitate transposition of Article 10(3)(d)? What would be the costs and benefits of doing so?*

Airtricity does not consider that there is a case for implementing this provision. We believe that sending customers billing information that is not considered a request for payment would create confusion. We agree with DETI that sufficient provision is already made for flexible payment options.

- b) *What would be the particular issues connected with extending requirements to cover non-domestic customers and keypad customers?*

In our view the same considerations apply for non-domestic customers. In the case of keypad customers no request for payment is sent in any event.

#### **4.5 Consultation Questions on Article 10(3)(e)**

- a) *What specific information do you think would be necessary to ensure that customers are able to compare deals on a like-for-like basis?*

Airtricity considers that providing information on the applicable tariff and unit rate, as currently required under electricity and gas supply licences, is sufficient to enable customers to compare deals on a like for like basis. Other than the length of a contract, Airtricity cannot see what other information is necessary to compare deals. The suggestion that the Consumer Checklist is not sufficiently accessible to customers is disappointing given the effort and expense of implementing this requirement. We consider that any change to current practice would be expensive.

We consider that this sub-article should not be taken to require a forecast of annual energy costs; such a forecast for a customer is likely to be misleading as consumption and other cost items (such as pass through charges) can change.

- b) *What conditions would constitute “in a timely manner”?*

Airtricity assumes this provision of the Directive to require that both quotes and bills must be presented in a timely manner. We consider that the requirements under earlier sections of the Directive to provide annual, bi-annual or quarterly billing information is sufficient for this purpose as suppliers are obliged to notify customers of any changes to these charges in the interim. Should an existing customer request that we provide them with these tariffs, we consider that two weeks is a suitable timeframe for issuing this data (or re-issuing a previous bill, notification or sign-up Terms and Conditions).

Airtricity does not believe a time limit by which a supplier must have issued a quote to a customer would be helpful, particularly for the non-domestic sector given the variety of contract types which can be developed, often on a bespoke basis. We consider that competitive forces will ensure that customers receive a quote in a timely manner, domestic customers will be given a quote immediately on calling Airtricity, meeting with our sales agents or visiting our website.

*c) What, in your view, would be the best and most cost effective way to present the relevant information “in an easily understandable format”?*

Airtricity believes that current billing requirements ensure that this information is provided in an understandable format. We note that any changes to billing format or content requires system changes and will impose costs which will ultimately have to be recovered from the consumer; for this reason we favour the taking of a purposive rather than prescriptive approach on presentation of data.

*d) What are the particular issues connected with these changes for keypad customers?*

Information on tariffs will be available to keypad customers from their signing up process, annual statement, notification of any tariff changes and usually on their meter. As for other customers, we consider that if a customer requests information on their tariff that two weeks is an appropriate timeframe for re-issue of this data.

*e) What are the particular issues connected with extending requirements to cover non-domestic customers?*

Although current requirements may not require gas and electricity suppliers to provide information on applicable tariff and unit rate to non-domestic customers as part of standard terms and conditions, we would consider it highly unusual not to provide this information to these customers. Where there are variable tariffs or tariffs indexed to other commodities an explanation of the design of the tariff should be sufficient. We would have no problem with the imposition of a condition similar to the current domestic customer requirement as we believe it is fulfilled in practice in any event.

Annex VII

#### **4.6 Consultation Questions and Proposed Answers on Annex VII 1.1 – Billing based on actual consumption**

*a) What potential costs and benefits do you think are associated with the requirements?*

Airtricity does not consider that any change is required with respect to the requirement to bill on the basis of actual consumption at least once per year as this is satisfied by current licence conditions. These existing licence conditions require that suppliers send a bill or statement at least annually, that they make reasonable efforts to take an actual reading at least annually

and are required to calculate a bill with reference to a meter read (or an estimate where a read is not available). A more demanding requirement would increase costs on suppliers significantly and may not be possible to achieve; we would argue that this is not economically justified and therefore is not required under Article 10(1).

Airtricity has no concerns with the proposal to require suppliers to provide billpay customers with twice yearly billing information or quarterly information where requested by the customer or where the customer avails of electronic billing.

*b) What are the particular issues connected with these changes for keypad customers?*

Airtricity considers that this proposal is not appropriate for keypad customers, and that the current annual statement requirement is sufficient to ensure that billing takes place on the basis of actual consumption at least once per year. We consider that billing information is available to keypad customers from their meter's display on an ongoing basis.

*c) What are the particular issues connected with extending requirements to cover non-domestic customers?*

We consider that the same considerations apply to domestic and non-domestic customers.

#### **4.7 Consultation Questions on Annex VII 1.2(b) – Minimum Information Contained in the Bill**

*a) Do you think that comparisons between current and previous energy consumption should be in graphic form, and if so, what would be your preferred format and why? Please give full details.*

Airtricity considers that the first question in implementing this provision is whether it is appropriate to implement such a requirement, this is set out as the test in Annex VII 1.2. As stated previously, inclusion of this information on bills will require systems and design changes, which are expensive for suppliers and will ultimately increase costs for consumers. We suggest that this provision be considered in the Smart Metering rollout programme as comparison information is much more useful where actual consumption data from regular meter reads is available, this is not the case at present and indeed previous usage will not be available to a new supplier. On this basis we consider that it would be inappropriate to introduce this requirement at present.

We believe that comparison of usage figures on previous bills with current bill is one way for customers to gain this information in the meantime.

If this provision were to be implemented Airtricity considers that suppliers must be given freedom as to how the information is presented. Prescriptive regulation on this question will increase costs even further.

b) *If you do not believe that a graphic format would be best, please outline how you believe the comparison should be made with full details.*

As above, if this provision is implemented Airtricity considers that suppliers should be free to present the information as they see best.

c) *What are the particular issues connected with these changes for keypad customers?*

As keypad customers do not receive regular bills Airtricity does not consider that this proposal is suitable or helpful for those customers.

d) *What are the particular issues connected with extending requirements to cover non-domestic customers?*

As above, Airtricity does not believe that this provision should be implemented as proposed.

e) *What potential costs and benefits do you think are associated with the proposed licence condition modifications?*

As stated above, Airtricity considers that there are limited benefits to this proposal where the information is not based on regular meter reads. It is presumed that this provision is included in the Directive in order to raise consumer awareness of usage and energy efficiency. Presentation of estimated data and load profile does not assist consumers in analysing and changing their behaviour, in addition factors such as weather/temperature year to year must be factored into this type of analysis.

f) *This section of Annex VII is qualified by the words “where appropriate” – are there any circumstances where this requirement is not appropriate? Please give full details.*

As set out above, Airtricity does not consider that it is appropriate to implement this provision given the costs involved in designing systems and procedures as well as implementation and administration costs. Such investment can only be wasteful with the rollout of smart metering in the next few years.

#### **4.8 Consultation Questions on Annex VII 1.2(c) – Provision of Energy Efficiency Information**

a) *What issues arise from a new requirement to provide energy efficiency information with bills etc?*

Airtricity considers that fulfilment of this provision requires more consideration. The substance of DETI’s proposed licence amendment is not clear. In particular the question arises as to whether suppliers are to be required to prepare the energy efficiency information, or refer consumers to an independent information source. Airtricity believes that it would be best for the required information to be available centrally, with suppliers’ bills pointing customers to this central information source. This will ensure consistency, objectivity and high quality of the information provided and will deliver an economy of scale in that each supplier will not have to research

each question; we note that much of the information will be quite specialist, eg technical specifications of energy-saving equipment.

Airtricity does not consider that a licence change is required in order to fulfil this provision of the Directive. Rather, Codes of Practice can be amended to provide that suppliers will bring customers' attention to this central body which provides all of the information listed in Annex VII 1.2(c). Alternatively this could be included in suppliers' energy efficiency Voluntary Agreements, and achievement of objectives under those agreements.

*b) What potential costs and benefits do you think are associated with the proposed licence condition modifications?*

As mentioned above, any modifications to bill content and format will impose a cost on suppliers. As stated, we consider that it would be better for this energy efficiency information to be prepared by a trusted independent central body; we feel that consumers would react better to an independent information source. Requiring suppliers to prepare this information will impose significant costs, dependent on the depth of information required. The implementation of this provision may benefit from being included in discussion around suppliers energy efficiency voluntary agreements.

*c) What are the particular issues connected with these changes for keypad customers?*

There are no particular issues, except that suppliers have less frequent contact with these consumers.

*d) What are the particular issues connected with extending requirements to cover non-domestic customers?*

No particular issues.

*e) This section of Annex VII is qualified by the words "where appropriate" – are there any circumstances where this requirement is not appropriate? Please give full details.*

Airtricity is committed to pursuing energy efficiency. We would be happy to direct our customers to information on energy efficiency but believe that it is only appropriate where high quality information is available from an objective source.

#### **4.9 Consultation Questions on Annex VII 1.2(c) – Provision of Energy Efficiency Information**

*a) What issues arise from an obligation on suppliers to provide this information to customers along with their bills?*

Airtricity considers that more consideration needs to be given to how this provision would be implemented; initially a decision on whether it is 'possible and useful' and if so a project plan for how the necessary data can be prepared and what parties should be involved in this project.

From our point of view, the main difficulty in respect of this provision is identifying the average normalised or benchmarked customer. As Airtricity and other suppliers only have access to data for our own customers, with relevant data protection considerations, we consider that suppliers are not best placed to calculate average usage. In addition, it is not self-evident what customer categories should be used, and what characteristics should define them. For example domestic electricity customers will have very different usage depending on type of dwelling and whether they use electric heating or have an electric vehicle; suppliers will not hold this type of information.

Rather, Airtricity considers it would be better for a central body calculated data and verified the 'average normalised or benchmarked final customer' and that consumers could compare their own usage, perhaps through a type of standardised online calculator such as 'Compare My Energy'. The Directive allows that bills or other materials could point consumers to this information and it need not necessarily be contained within bills.

There may be an opportunity to include this project in the smart metering rollout programme.

As with the previous question, Airtricity does not consider that a licence change is necessary in order to implement this provision.

*b) What are the particular issues connected with these changes for keypad customers?*

The main difference for keypad customers will be that they receive less frequent communications from suppliers than other customers.

*c) What are the particular issues connected with extending requirements to cover non-domestic customers?*

Given the diversity of non-domestic customers we question whether there is value in comparing a customer's usage with 'average' consumption.

- d) *What costs and benefits are associated with the requirement to provide the necessary information along with gas and electricity bills? Please give full details of how this requirement could be met at least cost.*

Airtricity considers that if it is decided that this provision is to be implemented, bills should point consumers to the necessary centralised information. Inclusion of the comparison itself on bills would require significant redesign of bills and software development to enable the calculation. As mentioned previously, we consider that suppliers do not have sufficient access to consumption data or, for example, housing stock data in order to calculate a meaningful comparison. This calculation would best be carried out by a centralised body and we would anticipate that this would require an in-depth study for which costs will be significant. There may be value in combining this comparison with an information source on energy efficiency which would satisfy the requirements of question 4.8 above. We consider that this type of comparison becomes much more informative and useful if more granular information on consumption is available and we suggest that this project could be incorporated in the Smart Metering programmes.

- e) *What are your views on whether the requirements of this paragraph are “possible and useful”?*

Airtricity considers that a significant amount of background research and data collection is necessary to provide a useful and relevant comparison. Suppliers do not have the data or resources to carry out the necessary research. As a first step, we believe that DETI should assess whether the necessary information can be compiled, or whether other resources can be used to provide a useful comparison. If not, the costs of carrying out a central assessment and providing a central comparison tool should be evaluated. A decision on whether to implement this provision should be made on that basis.

#### **4.10 Consultation Questions on Annex VII 1.3– Advice on energy efficiency accompanying bills and other feedback to final customers**

- a) *What issues arise from an obligation on suppliers and distribution system operators (if and when they are billing final customers) to provide this information to final customers along with their bills?*

Airtricity is committed to energy efficiency and is happy to provide our customers with contact information for the relevant energy efficiency bodies. As set out in response to questions 4.8 and 4.9 the main issue is to determine what body/bodies will provide this information in Northern Ireland. We are keen that high quality information be made available to consumers in order to build trust and confidence in energy efficiency decisions and thus drive uptake of energy efficiency measures.



For the reasons set out in respect of question 4.8 we are not convinced that a licence change is necessary in order to implement this provision. In any event we consider that suppliers should be given flexibility as to how they notify customers, it should not be prescribed that this information be included on bills themselves as this will impose significant costs for bill design – suppliers may deem it more effective to include this information on supplementary literature or email alerts.

*b) What are the particular issues connected with these changes for keypad customers?*

No particular issues.

*c) What are the particular issues connected with extending requirements to cover non-domestic customers?*

No particular issues.

*d) What costs and benefits are associated with the requirement to provide the necessary information along with gas and electricity bills?*

As stated above, it should not be stipulated how suppliers notify their customers of this information; suppliers must be afforded flexibility in this regard. We note that the costs of amending bill design are significant.

Airtricity does see merit in increasing customer awareness and information on the benefits of energy efficiency.

### **5.1 Cost of Access to Metering and Billing Information**

*a) What issues arise from an explicit requirement to ensure no separate charges are made for bills, billing information and consumption data?*

Airtricity considers that it is currently in compliance with this provision, we agree with the Department that this means that there should not be a separate charge for a customer receiving a bill, billing information or consumption data. Any change to licence should require that customers not be charged a separate specific payment for billing or to have access to their consumption data.

*b) What costs and benefits do you believe would be associated with these amendments? Please give details to support your assertion.*

Airtricity believes that it will be possible to implement this provision without imposing costs as it is already in compliance.

*c) Under Article 11(1), customers must be given access to their consumption data in an appropriate way. What would you consider to be an appropriate means of providing consumption data?*

Airtricity considers that inclusion of consumption data on bills is an appropriate means of providing this information. Smart metering is likely to give customers additional routes to check their consumption data.