

Annex A
RESPONSE TEMPLATE

**CONSULTATION ON IMPLEMENTATION OF ELECTRICITY AND GAS METERING AND BILLING PROVISIONS
OF THE ENERGY EFFICIENCY DIRECTIVE**

Consultation Paper	Comments
<p>Question 2.1</p> <p>(a) Do you agree that the current legislative provisions and license conditions are not sufficient to ensure compliance with Article 9(1)? If you disagree, please ensure that you explain your answer fully.</p>	<p>Items of Article 9 (1):</p> <ul style="list-style-type: none"> a. competitively priced, b. reflecting final customer’s actual energy consumption, and c. provide information on actual time of use <p>Although most meters deliver the items listed, this is through good practice, not a mandatory requirement. I feel ensuring this is mandatory is essential.</p>
<p>(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?</p>	<p>With oil being a significant energy supplier in NI metering of this system would offer a comparison with other fuels, but I appreciate it is not within this directive.</p>
<p>(d) What costs and benefits might arise from putting in place additional requirements in relation to gas and electricity metering?</p>	<p>The installation of these new meters will be a further cost to consumers. (The assumption is meters will dictate their behaviour, in terms of reduced energy use, which in the case of vulnerable tenants may not be the correction assumption).</p>

Consultation Paper	Comments
Question 3.1 (a) What issues arise from implementation of the requirements of the energy Efficiency Directive in relation to electricity and gas smart meters?	Cost of meters

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<p>Question 4.1</p> <p>(a) What issues arise from the proposal to put in place legislation to support the supply license conditions to meet the requirements set out in paragraph 4.10?</p>	<p>The costs of these meters would be an issue.</p>
<p>(c) What are the particular issues connected with these changes for keypad customers?</p>	<p>Vulnerable tenants may mix up the keypad meter with a smart meter.</p>
<p>(d) What costs and benefits might arise as a result of the proposed changes? Please give full details.</p>	<p>Cost of meter is likely to be borne by the customers.</p>

Consultation Paper	Comments
<p>Question 4.2</p> <p>(a) What issues might arise from new or amended license conditions requiring electricity and gas suppliers to provide the required information to an energy service company designated by the final customer?</p>	<p><i>The amended license conditions require the supplier to regular billing information EG.</i></p> <ol style="list-style-type: none"> 1. <i>Name & address</i> 2. <i>Meter reading</i> 3. <i>Tariff type</i> 4. <i>Cross reference data usage from last year</i> 5. <i>fuel mix</i> <p>Again cost of the service:</p> <ul style="list-style-type: none"> - Who nominates/procures the service? - Is the service connected to supplier eg. Is there a vested interest?
<p>(d) Do you anticipate any additional costs of benefits arising as a result of the proposed modification? If so, please give as much detail as possible.</p>	<p>More potential costs for customers seeking bill information from their supplier. Supplier may charge for this.</p>

Consultation Paper	Comments
<p>Question 4.3</p> <p>(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.</p>	<p>An online requirement is essential for increased accessibility as well as annual hard copies.</p>
<p>(b) What issues arise from an obligation on suppliers to offer online billing services?</p>	<p>Cost – who pays for this?</p>

Consultation Paper	Comments
<p>Question 4.4</p> <p>(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?</p>	<p>As choice is currently permitted for payment, is there a need to transpose Article 10(3)(d)?</p>

Consultation Paper	Comments
<p>Question 4.5</p> <p>(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?</p>	<p>The Consumer Checklist is 37 pages; perhaps a flowchart would be more easily read and importantly 37 pages is too long.</p>
<p>(b) What conditions would constitute “in a timely manner”?</p>	<p>Within weeks, not months, would be preferable. We would need specific timed standards of service, and the phrase ‘timely manner’ is not acceptable.</p>
<p>(c) What, in your view, would be the best and most cost effective way to present the relevant information “in an easily understandable format”?</p>	<p>The use of a flowchart (interactive) would be preferable.</p>
<p>(d) What are the particular issues connected with these changes for keypad customers?</p>	<p>Cost – this is a smart meter which will have an additional cost in terms of replacing a keypad meter.</p>

Consultation Paper	Comments
<p>Question 4.6</p> <p>(a) What potential costs and benefits do you think are associated with the requirements?</p>	<p>Background: The proposal is the new license conditions which are necessary to provide:</p> <ol style="list-style-type: none"> 1. Billing based on annual consumption at least once a year 2. Billing information is made available at least quarterly on request or where the customer has opted to receive electronic billing or every six months. <p>Cost of receiving data for annual consumption:</p> <ul style="list-style-type: none"> - meter readings - self reading must be verified on an annual basis

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<p>Question 4.7</p> <p>(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.</p>	<p>Pie chart with last year & average NI consumption would allow benchmarking.</p>
<p>(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.</p>	<p>Graphic is the best format as it is visual, allowing easy understanding.</p>
<p>(d) What are the particular issues connected with extending requirements to cover non-domestic customers?</p>	<p>As this information is already available to the supplier, the cost should not be incurred on the end user.</p>
<p>(e) What potential costs and benefits do you think are associated with the proposed licence condition modifications?</p>	<p>Again this could be perceived as the supplier imposing stealth costs.</p>

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<p>Question 4.8</p> <p>(a) What issues arise from a new requirement to provide energy efficiency information with bills etc?</p>	<ol style="list-style-type: none"> 1. Costs 2. Ensure advice is impartial and not promoting energy business that the supplier has an interest in. 3. A mechanism for ensuring advice is impartial.
<p>(b) What potential costs and benefits do you think are associated with the proposed licence condition modifications?</p>	<ol style="list-style-type: none"> 1. Again costs 2. Benefits – end users making more efficient energy use.
<p>(c) What are the particular issues connected with these changes for keypad customers?</p>	<p>Can they still avail of full range of discounts.</p>

Consultation Paper	Comments
<p>Question 4.9</p> <p>(a) What issues arise from an obligation on suppliers to provide this information to customers along with their bills?</p>	<p>Background: There is a requirement under the proposed legislation for the supplier to provide benchmark comparisons with their bills.</p> <p>Will the Utility Regulator ensure its impartial – will it be policed/monitored.</p>
<p>(b) What are the particular issues connected with these changes for keypad customers?</p>	<p>Ensure they are not disadvantaged and receive all comparable rates/discounts.</p>
<p>(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 a least cost.</p>	<p>On line with marketing campaign All providers/suppliers use one generic comparison website.</p>
<p>(e) What are your views on whether the requirements of this paragraph are “possible and useful”?</p>	<p>Ensuring clear, concise price comparisons and delivering simplistic systems are two essential elements.</p>

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<p>Question 4.10</p> <p>(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?</p>	<p>Background: At present the suppliers don't have to provide details of independent energy advice and the cost of moving meters is passed to the supplier who in turns may charge the customer.</p> <p>Customers must be told of details to get independent energy advice and the cost of moving should be kept to a minimum, and if a charge is necessary it should be clearly stated, as well as keeping to a minimum..</p>
<p>(b) What are the particular issues connected with these changes for keypad customers?</p>	<p>As above</p>
<p>(d) What costs and benefits are associated with the requirement to provide the necessary information along with gas and electricity bills?</p>	<p>Benefit of energy efficiency is apparent, but the supplier should not charge for this as a service.</p>

Consultation Paper	Comments
<p>Question 5.1</p> <p>(a) What issues arise from an explicit requirement to ensure no separate charges are made for bills, billing information and consumption data?</p>	<p>Definition of no charge: is it either:</p> <ol style="list-style-type: none"> 1. No separate charge, levy to all partners who use the service, or 2. No charge and costs are absorbed by supplier.
<p>(b) What costs and benefits do you believe would be associated with these amendments? Please give details to support your assertion.</p>	<p>Costs would be formatting the existing information, which the supplier has to deliver in a readable statement.</p>
<p>(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?</p>	<p>If it's a requirement to provide the data in a most suitable method, I believe the annual written statement posted out is preferable.</p>

