Review of Electricity and Gas Supply Licences
Proposed Decision Paper (CER/11/220)

Airtricity Response to
Commission for Energy Regulation

January 2012
INTRODUCTION


We accept most of the proposed decisions that have been made. However we do not believe that some of the specific concerns raised in our response to the original consultation have been adequately addressed in the draft Decision.

Our specific concerns are in connection with the following;

- The definition of vulnerable customers as defined in “S.I. No. 463 of 2011” (see section 4 (1) a-g) does not give any specific criteria in determining vulnerability of a customer; its descriptions are subjective rather than definitive.
- Our issue over the provision of a perverse incentive for customers to waste energy was not addressed in the proposed Decision.

These issues remain a concern for Airtricity, as we believe that clear and unambiguous regulatory obligations are required both by suppliers in order to deliver their responsibilities and by customers to provide certainty on the standards they will receive.

Yours Sincerely,

Iain Wright