

CER Market Monitoring in the Electricity and Gas Retail Markets
 Consultation Paper CER/13/302

Responses below for BGN related Proposals

High Level Comments:

BGN welcome the opportunity to respond to this consultation document. As you will see from our responses below there are instances where:

- BGN cannot assist on the query/information required or would be unable to provide the data in the format requested
- BGN already delivers the query/information
- BGN can deliver the query/information but would have to test and build new reports to meet the requirements

Once further clarification is provided on the specific reporting deliverables that CER would like to introduce, BGN would like to meet to discuss timelines and recovery of relevant appropriate costs to deliver.

Proposal

Consultation Proposal 1.

The current methodology of segmentation (option 1) will continue to be required and data will be collected based on this segmentation. It is proposed that domestic PAYG customers will form a separate subset of the domestic category.

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Consultation Proposal 2.

Networks will be required to submit customer numbers and consumption in gas and electricity based on Eurostat bands by supplier once a year.

Consultation Proposal 3.

The CER proposes to report on gas market segments under the following naming conventions:

- Domestic
- Small business – instead of the current IC market
- Medium business – instead of the current FVT market
- Large business – instead of the current RTF market.

Question

BGN Response

Question 1 - Respondents are invited to comment on the proposals presented for the electricity and gas market segmentation? Respondents are also invited to suggest alternative market categories.

Question 1
 Please see comment below.
 We think there is one category missing from the list, which is AQ > 73,000 kWh and SPC < 3,750 kWh.

Question 2 - Respondents are invited to comment on the proposal on Networks submitting data based on Eurostat bands once a year? Respondents are also invited to make alternative suggestions.

Question 2
 This is fine. Just to clarify, BGN will provide this by Customer Number and Allocation kWh as per the monthly report but with Eurostat bands. Yearly report format will need to be defined.

Question 3 – Is the proposed naming convention

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for the gas market segments accurate? The CER would request that respondents ensure that the proposed naming convention accurately reflects the type of customer within each category.	Question 3 Please see BGN comment below
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Comment:

Current Breakdown	Definition	Proposed CER Naming Convention for Segment	BGN Comment
Residential	Non business customers	Domestic	Agree
Industrial and commercial	Sites with a consumption level below 73,000kWh of gas annually and Business Customer (non-residential)	Small business	Agree
	Sites with a supply point capacity of below 3,750 kWh and consumption level above 73,000 kWh	Medium Business	BGN have over 9K customers in this category and in our opinion would be classified as medium sized businesses
FVT eligible	Sites with a supply point capacity of above 3,750kWh and consumption level above 73,000kWh of gas annually and Less than 5.5GWh	Large Business	These are hospitals, prisons, county council buildings, hotels, large industries. We have over 2K of these and in our opinion would be large businesses
RTF eligible	Sites with an annual consumption of between 5.5GWhs and 264 GWhs.	businesses between 5.5GWhs and 264 GWhs	We currently have over 200 of these premises. These are daily metered and large daily metered sites.

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Proposal	
<p>Consultation Proposal 4 The CER is proposing the switching indicators outlined in the table below.</p>	
Question	BGN Response
<p>Consultation Question: Question 4 - Respondents are invited to comment on the whether the indicators outlined for measuring switching are sufficient and if not, what other methodology could be used?</p>	<ul style="list-style-type: none"> • GPRO is unable to separately identify Financial Hardship PAYG customer category. • All CoS are a CoLE on BGNs IT systems - not able to quantify CoLEs. No Dual fuel info. • Repeat switching by GPRN, Re-categorisation? • What are delayed switches? Time-outs or QA fails? • Cannot do aged report, only time-outs. • Define Failed Switches.

Proposal	
<p>Consultation Proposal 6. The CER is proposing the collection of data on new connections, average time to connect and reconnect, and the range of times to connect and reconnect. The table below provides more information on the specific requirements.</p>	
Question	BGN Response
<p>Consultation Question: Question 6 - Respondents are invited to comment on whether the proposals outlined for measuring connections and time to connect are sufficient. Respondents are also invited to make alternative suggestions.</p>	<ul style="list-style-type: none"> • Can the CER please confirm that this is Distribution connected sites only • May be difficult to report on this as PAYG or Large Business etc. as this is not specified in the work order for connection. Would need IT evaluation to see the categories available. Might be just Res or IC. • Number of new registrations / proportion that are reconnections – ok to report on this pending category confirmation from IT. • Average time to connect (days) – from customer request date. This data would need a caveat stating that delays in time to connect are not always due to BGN, customers often request connection but request it for 4 weeks time etc. Again IT report needed here. • Range of times to connect (0-10 days, 11 – 15 days etc). – this would

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	need to be an IT report, automation of this data output would be necessary.
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Proposal	
<p>Consultation Proposal 7. The CER is proposing to collect the following indicators in January /February of the following year:</p> <ul style="list-style-type: none"> •Electricity: Average Customer Minutes Lost (CML) & Customer Interruptions (CIs). •Gas: Restoration of gas supply by the end of the following day following Notification. 	
Question	BGN Response
<p>Consultation Question: Question 7 - Respondents are invited to comment on whether the proposals outlined for monitoring repairs are sufficient. Respondents are also invited to make alternative suggestions.</p>	<p>Service Delivery - This is a report that can be run monthly to identify our response time to No Gas (restoration) WO. Therefore we can comply with the January/February timeframe to report the previous year's figures.</p>

Proposal	
<p>Consultation Proposal 8 The CER is proposing the indicators on NPA disconnections, time to reconnect and PAYG meters outlined in the table below</p> <p>Consultation Proposal 9 The CER proposes to monitor the level of self-disconnection among PAYG customers.</p>	
Question	BGN Response
<p>Consultation Questions: Question 8 - Respondents are invited to comment on whether the proposals outlined for monitoring disconnections, reconnections and PAYG meters are sufficient. Respondents are also invited to make alternative suggestions. Question 9 – Respondents are invited to make suggestions on how to measure self-disconnections of PAYG customers.</p>	<p>Answer 8:</p> <ul style="list-style-type: none"> • NPA Disconnections – BGN can provide data on Credit Locks which we can assume all are for NPA. Could a more complete come from suppliers? • Time to Reconnect – BGN can facilitate reporting on time difference between Disconnect/Credit Lock and ReFit/Unlock. We cannot differentiate this based on Change of Legal Entity • Self Disconnection of PAYG Customers – from Suppliers S12 files, BGN does not have visibility of this. • PAYG Meters for Financial Hardship – yes, BGN can provide this data • PAYG Customers reverting to Credit

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	<p style="text-align: right;">– yes, BGN can provide this data.</p> <p>Answer 9: Suppliers should have aspects of this data in their SI12 files. Emergency Credit Debt information is in here. If this is set to €5 spent then self-disconnected as it indicates customer has used all emergency credit.</p> <p>The only issue is that a customer may choose not to use Emergency Credit and may self disconnect with EC still in tact. BGN do not have a way of reporting on this and I’m not sure whether suppliers do either. Difficult to measure this one as self disconnection in the summer also may be quite deliberate as not using gas.</p>
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Proposal	
Consultation Proposal 10.	
The CER is proposing the debt flagging indicators outlined in the table below.	
Question	BGN Response
<p>Consultation Question: Question 10 - Respondents are invited to comment on whether the proposals outlined for measuring debt flagging are sufficient. Respondents are also invited to make alternative suggestions.</p>	<p>No debt flags on DM/LDM categories. Question on granularity of data for small number of instances – gas c.50 cancellations/month.</p>

Proposal	
Consultation Proposal 11 and 12.	
The CER is proposing the market share indicators outlined in the table below.	
Question	BGN Response
<p>Consultation Questions: Question 11 - Respondents are invited to comment on the whether the proposals outlined for measuring market share are sufficient. Respondents are also invited to make alternative suggestions. Question 12 - Respondents are invited to comment on the proposal to collect information from suppliers on the market segments they are active in.</p>	<p>Answer 11</p> <p>BGN will continue to report on the market share data but include the new bands for PAYG etc.</p> <p>Can you please confirm the reporting requirement for vulnerable customers? Are you saying that you want them</p>

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	<p>removed from this report or are you suggesting that PAYG customers are vulnerable? Can you please indicate if you are looking for a separate line for vulnerable customers AND for PAYG – I’m not sure BGN has this data split out, this would require work.</p> <p>BGN will continue to report on this from Allocations kWh and not switch to AQ kWh as previously discussed.</p> <p>BGN took a look at the difference in the reporting from Allocations and AQ and using the AQ and Allocations gives the same market share results as this data is based on customer numbers.</p>
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Proposal	
<p>Consultation Proposal 19. The CER proposes the customer complaints indicator as identified in the consultation paper and in table below.</p>	
Question	BGN Response
<p>Consultation Question: Question 19 - Respondents are invited to comment on the proposals for monitoring customer complaints. Respondents are also invited to make alternative suggestions.</p>	<p>Please see comments in table below.</p>

Complaint Categories – please see below table for comments on Networks Categories.

Comment on supplier categories. Meter issues should be a networks category. Should suppliers be reporting on this?

Network Categories	Networks Comments
Estimated Meter Readings	Already a category.

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Customer Service Issues	What is meant by this? too vague
Billing Issues	Not a Networks issue
Meter Issues	What is covered? This could cover a multitude of complaint types
Quality of supply/interruption to supply	Interruption to Supply already a category, Quality of supply? What is meant by this
Siteworks Charges	What charges are covered? are these all siteworks charges or those relating to shipper requested work?
Other Issues	Too vague