



Market Monitoring in the Electricity and Gas Retail Markets

Consultation Paper CER/13/302

Response from ESB Networks

28<sup>th</sup> February 2014

## Introduction

ESB Networks welcomes the opportunity to comment on the Commission's proposals for market monitoring in the electricity retail market as set out in Consultation Paper CER/13/302. While the paper sets out a framework for market monitoring and for the type of information required, ESB Networks currently provides a range of information to CER on market share, change of supplier, disconnections, customer minutes lost, supply interruptions, etc. Many of the indicators proposed for market monitoring are similar or are a variant on what is currently provided.

## Responses to proposals

### Question 1

CER proposals for electricity market segmentation are adequate.

### Question 2

We agree with CER proposal to submit data based on Eurostat bands once a year.

### Question 4

We broadly agree with CER proposals for switching indicators.

1. *Switches Requested*, this is a new report and will provide number of switches requested by supplier and by DUoS Group. A further column will indicate the subset of these switches where PAYG meters are installed. This report to replace the current Monthly Switching Report.
2. *Switches Completed*, this is the current monthly Churn Report, this will be modified to include sites where PAYG meters are installed. A separate report as below will provide information on the proportion of total switches that were also a CoLE.

Supplier	DUoS Group	Total No. of switches completed	Proportion COLEs	PAYG meter currently installed
A	DG1	12	12%	
B	DG2	14	16%	2

3. *Repeat Switching*, this will be a new report providing data on the number of repeat switches per MPRN by DUoS Group and excluding CoLE. A further column will indicate the subset of these switches where PAYG meters are installed. The annual

report will reflect the categories (DG and PAYG) as they exist at year end when the report is compiled, note that the status may have changed during the year.

4. *Delayed Switches*, CER suggested in their clarification that this is based on the date the supplier requested the switch and that any issues around this should be outlined in the response. This is a new report, measurement of the delay will be based on the date requested by the supplier. However, we are interpreting this as using the required date on the 010MM as requested by the supplier and where not populated default to the current date. This will take into account the various read arrangements that a supplier can request. Suggested report headings as below

Band	Supplier	DUoS Group	Total no. of delayed switches	PAYG meter currently installed
2 to <3	A	DG1	12	
3 to <4	B	DG2	14	2
4 to <5	C	DG1	2	1

5. *Failed Switches*, this will be a new report providing number of failed switches by supplier and by DUoS Group. A further column will indicate the subset of these failed switches where PAYG meters are installed.

#### Question 6

We agree with CER proposals for measuring connections but have some reservations on the measurement of time to connect.

1. *New connections/registrations*, this will be a new report with typical output below. A connection is classified as a re-registration if it follows a de-registration.

Period	Supplier	DUoS Group	Number of new registrations/connections	Proportion Re-registrations	PAYG meter currently installed
June	A	DG1	12	5%	
July	B	DG1	14	1%	2
	C	DG5	2	0%	1

2. *Average time to connect.* ESB Networks suggested that measurement of time to connect be based on a start date of when the service order is released and an end date of when the meter is energised. CER clarification was that this be based on when the customer requested the work. However, there are several variables around this, is it when the customer is quoted (may or may not accept terms), job may stall where the customer fails to provide required permits etc. We can report time to connect on the basis of several stages in the job, however it depends on what information you wish to draw from this. Suggested report below.

Range of time to connect (Days)	Average number of days	DUoS Group	Number of new registrations / connections	PAYG meter currently installed
0- 10	6	DG1	12	
11- 15	15	DG2	14	2
16- 20	3	DG5	2	1

3. *Range of times to connect,* new report required as per 2. above. Same comments apply in relation to measurement of start date.

#### Question 7

CER proposals for repairs are adequate.

#### Questions 8 & 9

ESB Networks broadly agree with CER proposals on monitoring disconnections, reconnections and PAYG meters. Some individual comments are given below.

1. *NPA Disconnections,* new report required. Note that address field for City in ESB Networks market system may not equate with the same field for the Gas business. We are still unclear how the distinction between suppliers billed and current applies to this indicator and suggest it may be more appropriate under the report on *Time to Reconnect* below.

County	City	Supplier	DUoS Group	Number of NPA Disconnections
Cork	BANDON	A	DG1	12
	BANDON	B	DG1	14
	BANDON	C	DG2	2

2. *Time to Reconnect*, as the data to be submitted will cover the disconnections that occurred during the quarter six months before the reporting quarter, we are assuming here that this is a rolling report. We will determine if a CoLE has taken place by comparing the name on the disconnection and re-connection orders. As referred to in 1. above we are suggesting in this report the inclusion of the supplier at disconnection and again at reconnection.

DUoS Group	MPRN	Date of Disconnection	Supplier at Disconnection	Date of Reconnection	Supplier at Reconnection	CoLE (Y/N)
DG1	10000 00120	12.10.2013	A	02.01.2014	B	N
DG2	10000 00121	02.10.2013	A	05.01.2014	A	Y

3. *Self disconnection of PAYG customers*. This indicator requires information on consumption at site to be available to indicate self disconnection or reduction in consumption. However, as these are NQH sites ESB Networks do not have real-time information on consumption. Furthermore, ESB Networks does not have access to customer vending history to assist in indicating self disconnection of PAYG customers.
4. *PAYG meters for financial hardship*, new report will be required and will show numbers of PAYG meters installed by supplier broken down by county and city. Per current policy, ESB Networks only install PAYG meters in cases of financial hardship.
5. *PAYG customers reverting to credit*. This information is not held in the market system however Keypad Management Services Team can provide information from

Liberty on the number of PAYG meters that are on TCC0, the assumption being that TCC0 is credit mode. This information can be provided at the end of the month per supplier. This is a snapshot at a point in time and clearly may change at any point after the report is run.

#### Question 10

CER proposals for *Debt Flags raised* and *Debt Flagged COS requests* are adequate. Proposals are generally in line with data currently reported and will continue to be done manually pending changes for automating debt flagging in the market system.

#### Question 11

CER proposals for monitoring *Market Share* are adequate. ESB Networks propose three separate reports to meet these requirements, a monthly report showing total customer numbers and consumption, a monthly report showing the subset of vulnerable customers and consumption and finally an annual report showing total customer numbers and consumption by Eurostat Bands. CER clarification on this proposal raised the issue of timing for producing these reports. The two-monthly billing cycle is fundamental here in that the data is only available for all NQH sites after two months.

#### Question 19

CER proposals for monitoring *Customer Complaints* are adequate. The complaints list currently catered for in the market system will be extended to include the new proposals. A new report will be required.