



**Gas
Networks
Ireland**

**RESPONSE TO CER PROPOSED DECISION PAPER
– CER15/272 – EMPOWERING & PROTECTING CUSTOMERS**

January, 2016



**Gas Networks Ireland Response to
CER Proposed Decision Paper Empowering & Protecting Customers**

20th January, 2016

Gas Networks Ireland welcomes the opportunity to respond to the CER Proposed Decision Paper CER 15/272 – Empowering & Protecting Customers. Gas Networks Ireland has considered the questions raised by the CER and notes that a number of them are more applicable to Suppliers as their back-end systems will play a central role in providing the Smart Bill and Energy Statement as envisaged by the High Level Design.

Our response to the questions raised in the CER Consultation Paper are provided below:

Question		Response		
No	Question	Yes	No	Rationale
1	Do you have any views on the CER's Proposed Decision to clarify policy on the Harmonised Downloadable File (HDF) to ensure that updates are incorporated (and hence made available to interested customers) in a timely manner, and frequently?	√		Gas Networks Ireland agree with the CER's Proposed Decision that data updates relevant to the Harmonised Downloadable File (HDF) are made available to a customer within [24] hours.
2	Do you have any views on the CER's Proposed Decision for minimum standards for the provision by Suppliers of "at a glance" information to residential customers, to complement the Smart Bill and Energy Statement, and access to a Harmonised Downloadable File (HDF) of their consumption data?	√		Gas Networks Ireland believe that the CER Proposed Decision whereby ESNB shall make available and support an IHD is an unnecessary requirement for the programme.
3	Do you have any views on the CER's Proposed Decision on the need to amend and augment the rules on the presentation of tariff information, consequent to the introduction of Time-of-Use Tariffs?		√	Rules regarding the presentation of tariff information, consequent to the introduction of Time-of-Use Tariffs is primarily a matter for Suppliers to consider and facilitate in the electricity market.

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No	Question	Yes	No	Rationale
4	Do you have any views on the options set out in section 3.3.4 for giving practical effect to the concept of simple labels and standard metrics to enable customers to understand and compare Time-of-Use tariffs more easily?		√	
5	Do you have any views on the CER's Proposed Decision to amend the disconnection process in order to maintain comparable levels of customer protection in the context of disconnection (and reconnection) not requiring a site visit in order to undertake physical works following the rollout of smart meters?	√		Gas Networks Ireland believes that the CER's Proposed Decision to amend the disconnection process for credit customers will place an additional cost and onus on Suppliers and Network companies and reduce one of the key benefits of Smart metering which is the reduction of site visits for meter-related siteworks activities.
6	Do you have any views on the CER's Proposed Decision not to develop more extensive changes to the framework of regulation and access to data for third party intermediaries at this stage – but to keep the issue under review as part of its wider work programme on Retail Policy?	√		Gas Networks Ireland agrees with the CER's Proposed Decision that more extensive changes to the framework of regulation and access to data for third party intermediaries can be developed at a later stage of the programme.
7	Do you have any views on the CER's Proposed Decision on different forms of NSMP participation, and the role of policy in respect of customers who do not participate fully?	√		Gas Networks Ireland is in general agreement with the CER's Proposed Decision on different forms of NSMP participation, and the role of policy in respect of customers who do not participate fully.