

Review of the Electricity and Gas Suppliers Handbook

Detailed responses for Electric Ireland

Question 1

Respondents are invited to comment on the introduction of a set of overarching principles to govern the customer-supplier relationship. Should these principles apply to both household and non-household customers? Do you agree with the proposed requirements? What other requirements should be considered? Please outline reasons for agreement or disagreement.

Answer 1

Electric Ireland supports the proposals set out in the paper.

Question 2

Respondents are invited to comment on the proposed requirement. Do you agree with the proposed amendment? Please outline reasons for agreement and disagreement.

Answer 2

Electric Ireland supports the proposals set out in the paper.

Question 3

Respondents are invited to comment on the proposed amendment. Do you agree with the proposed amendment? Please outline reasons for agreement and disagreement.

Answer 3

Electric Ireland propose that a reference to a website link on an ongoing basis would suffice bearing in mind that the bill is already quite cluttered with information and that this, in itself, already makes it difficult for a customer to identify messages and / or information that may be useful to them.

Question 4

Respondents are invited to comment on whether the current requirements of the introductory section (i.e. Introduction, Application and Approval Process) require updating.

Answer 4

It would be useful if some broad timings could be placed around the approval process to indicate on the approval process

- a) How long in advance CER require the relevant documents and
- b) A maximum turnaround time by CER to facilitate business planning, go live dates etc.

Question 5

Respondents are invited to comment on whether the current requirements of this section require updating. Should other requirements be considered for inclusion? Please provide arguments to substantiate your point of view.

Answer 5

Electric Ireland do not believe there is a need to add additional requirements

Question 6

Respondents are invited to comment on the proposed requirement. Do you agree with the introduction of this requirement? Please outline reasons for agreement and disagreement.

Answer 6

Electric Ireland supports the proposals set out in the paper.

Question 7

Respondents are invited to comment on the proposed requirement. Do you agree with this requirement? Please outline reasons for agreement and disagreement.

Answer 7

Electric Ireland supports the proposals set out in the paper.

Question 8

Respondents are invited to comment on the proposed requirement. Do you agree with these requirements? Please outline reasons for agreement and disagreement.

Answer 8

Price Comparison Websites are commercially driven businesses who can and do offer their own affinity deals on a bi-lateral basis with energy suppliers who are in competition with other energy suppliers. As a consequence they have a direct and selfish interest in being aware of other offers that may be coming on the market.

Advance notification to PCW'S (as proposed 'in sufficient time') will provide competitive advantage to the PCW if 'sufficient time' extends beyond 1 day or less.

We are unable to also understand why it is necessary to make notification mandatory – this provides an opportunity to create imbalance in the relationship with suppliers, given PCW's are already actively engaged with the market themselves; and that the scope of this commercial engagement could quite easily expand, if experience in other markets is a guide.

Question 9

Respondents are invited to comment on the proposed requirements. Do you agree with these requirements? Are there other requirements that we should consider for inclusion in this section? Please outline reasons for agreement and disagreement.

Answer 9

The proposals represent a significant extension of obligations as against what is currently required. We understand for example from our marketing and advertising partners that implementation of the proposed requirements could double the amount of time (and cost) required to air amended ads on either radio or TV.

Notwithstanding that costs would become prohibitive the ads themselves would simply not be suitable for airing as the terms and conditions requirements would far exceed the time devoted to informing customers of new choices available in the market and would necessarily limit competitive activity (including, we believe, switching) and customer interest in the market.

We suggest that consideration is given to allowing a more appropriate approach to be taken in respect of audio and audio-visual marketing / advertising activity across all media channels. Specifically we request that radio and TV advertisements are treated separately and differently. This would include for example *reference only* on these channels as to where full terms and conditions could be accessed by customers, e.g. the web.

We also believe that reference to all charges individually would also make marketing / advertising more inaccessible for customers. We suggest that a collective reference that all energy costs are included in the offer rather than mentioning items individually is a more effective way of delivering on this requirement.

Question 10

Respondents are invited to comment on the options put forward to increase customers' ability to understand and compare energy offers, as detailed at a), b) and c) above. Do you have a preferred option or combination of options What other

options should we considered? Please provide arguments to substantiate your viewpoint.

Answer 10

- A) This is the preferred option for Electric Ireland.
- B) Apart from the obvious difficulties as pointed out by CER there is also a legal requirement to present, for example separate VAT details. In addition we would anticipate increased customer frustration, call activity and complaints arising from oversimplification of bill details. Our own approach is informed by customer research that customers prefer 'less is more' on the front of a bill but focussing on the three or four elements of the bill of key interest to them. All relevant additional bill details are presented on the back of the bill.
- C) Again as pointed out the customer is unlikely to have details of their own current tariffs available to allow a comparison be made on that basis so an agreed estimated annual consumption figure would be a sensible approach. If deciding to mandate such an approach Electric Ireland would favour imposing an obligation on all suppliers in all cases to provide a comparison using the CER approved estimated annual consumption, if also providing a comparison using another suppliers tariffs, given seasonality factors that apply where only one bill is likely to be the basis for any comparison. Electric Ireland also favour the Northern Ireland requirement that the obligation only applies where savings are explicitly claimed by the sales agent.

Question 11

Respondents are invited to comment on the following questions:

- i. Do you think that specific customer protection measures should be introduced to limit the number, frequency and format of suppliers' attempts to contact a customer for retention /win-back activities? Should a principle based approach be used for customer protection purposes in this case or would a combination of principle and rule based be more appropriate?
- ii. Where a rule based approach is preferred, please comment on what is the most appropriate number, frequency and format of attempts to contact customers for retention/win-back purposes?

Answer 11

Electric Ireland support application of measures to cap the numbers and frequency of contacts in winback / retention scenarios. Excessive contact in a retention / winback scenario is annoying to a customer and is very damaging to the reputation of all participants in the industry.

Electric Ireland separately support a principle based element in terms of conduct applied when engaging in retention / winback activities. Prescription in this area may impede innovation and competition and can be very difficult to monitor but highlighting limits that apply can be helpful, for example, in stopping a conversation where the customer clearly indicates that they have no interest in discussing the offer and / or where they indicate they do not want to continue a conversation and / or where they clearly indicate they do not want to be contacted again in relation to an offer etc. Restrictions should be particularly stringent in the case of identified vulnerable customers.

Question 12

Respondents are invited to comment on the proposed requirement. Do you agree with this requirement? Please outline reasons for agreement and disagreement.

Answer 12

Electric Ireland agree with the proposal as set out.

Question 13

We are inviting respondents to comment on whether specific regulatory measures are required to prevent PAYG lifestyle suppliers from combining the provision of the deactivation code with any retention or win-back activities. Please outline reasons for agreement and disagreement.

Answer 13

Electric Ireland support the separation of the issuing of the deactivation code from any winback / retention activities as any delay in issuing it clearly applies undue influence in the switch decision making process and violates the customers right to switch where one is made contingent on the other. For clarity we advocate that the deactivation code is given first, followed by Retention or Winback activities, not just the separating of the two activities.

Question 14 Respondents are further invited to comment on whether we should consider additional requirements for inclusion in this section. What should these requirements address and what is the most appropriate wording for such requirements?

Answer 14

Electric Ireland propose that the meter install cannot take place until the market message has been received by the losing supplier; and that, where the meter is being installed within the 14 day cooling off period, the customer is clearly informed, at installation, of their rights to change their mind or opt for another supplier offer

under cooling off period requirements ; and that the customer acknowledges their understanding of this option in writing ; and that a record of this customer acknowledgement is retained by the installing supplier; and, critically, ensuring that the customer understands that ticking a “waiver” box on the 14 day cooling off period does not impact on their right to still cease the switch if they should change their mind.

Question 15

Respondents are invited to comment on the proposed requirement which will see suppliers’ door to door sale agents having to leave a Cancellation Form with the customer, together with the Doorstep Checklist, upon completion of the sales pitch.

Answer 15

Electric Ireland support the proposal to include a cancellation form with the Doorstep checklist provided by door to door sales agents

Question 16

Respondents are invited to comment on the proposed amendments to the Doorstep Checklists for bill pay and pre pay energy offers, as detailed in Annex 4, respectively 5. Do you agree with the suggested amendments? Please outline reasons for agreement and disagreement.

Answer 16

Electric Ireland support optimum transparency for customers in the doorstep checklist. We further support additional content proposed in respect in respect of prepay customers though we believe that these can be included in an amended checklist rather than through producing a separate checklist for prepay as against credit meter customers. In any event we believe, subject to a decision on extra content, that suppliers are allowed discretion as to whether it is delivered through an amended or separate checklist.

Question 17

Respondents are invited to comment on the proposed amendments to Section 5.8 of the Customer Sign Up. Do you agree with the proposed amendments? Please outline reasons for agreement and disagreement.

Answer 17

Electric Ireland welcomes the proposal as set out.

Question 18

Respondents are invited to comment on the above options to improve customer participation and protect customers who do not engage with the market.

Do you have a preferred option or combination of options?

What other options should we consider to maximise market participation?

What other options should we considered to protect customers who do not engage with the energy markets?

Please provide a rationale to substantiate your view point.

Answer 18

- A)** Electric Ireland support this proposal. It should be noted however that the provision of additional notification to a customer before the expiry of a fixed term contract will impose additional costs on suppliers, not just through the extra postage but also in terms of additional calls to the our contact centre. These extra costs, where material, will only be recoverable through customer tariff adjustment ultimately.
- B)** Electric Ireland support this proposal. As with a) above however there are also additional recoverable supplier costs. We also think that reference to price comparison websites should not be mandatory bearing in mind that they are increasingly players in the market on a commercial basis and it should be left to individual suppliers as to whether they wish to provide such a reference.

Finally we are conscious that many customers remain disengaged from the market by choice and / or because they are very happy with their existing supplier may not welcome pressure from the market to become actively engaged. Some further consideration of the optimum method for targeting and alerting non-engaged customers who may be interested in engaging would be useful. Such consideration might also include highlighting to customers their option to opt out of future such alerts.

- C)** Electric Ireland positively welcomes this proposal and we acknowledge merit in the equality of treatment principle underlying it, seeking as it does to ensure that all customers, and not just switchers, can benefit from the competitive market.
- D)** Electric Ireland believes that customers who continuously deliver behaviours which contribute to lower cost to serve deserve value offers and pricing options which recognise such contributions on either a short term or enduring basis.

It should be noted however that where extra value is being provided to certain customer classes then

- rebalancing of tariffs to reflect fairness and equal treatment for all customers may be required; and
- where the overall base of customers in receipt of extra value / better pricing is increased on a short term or enduring basis the average reduction available to customers delivering best behaviours will necessarily be lower; and

- finally, it is necessary to acknowledge and reflect the challenges faced by many in society who are unfortunately not in a position to deliver desired best behaviours and indeed will struggle to pay for their energy on an ongoing basis. In the latter case in particular Electric Ireland (always) feels it is incumbent on us where possible to provide and appropriately fund relevant pricing and service supports to cushion the impacts on the most needy customers.

Balancing these drivers to achieve optimum energy cost outcomes for the maximum number of customers at all times is an ongoing business challenge within existing market structures which places maximum emphasis on switching rates as the key success factor for the market.

Electric Ireland preference is for a combination of all four options, applied as a package, to appropriately reflect the wide range of factors at work *and perhaps desired* in the market across different classes of customers but which is also capable of being delivered within appropriately balanced market structures.

Question 19

Respondents are invited to comment on the proposed new requirements and amendments to current requirements. Do you agree with the introduction of these requirements and the proposed phrasing? Please outline reasons for agreement and disagreement.

Answer 19

1. Proposed Requirement 1

Electric Ireland supports the proposal.

2. Proposed Requirement 2

Electric Ireland support proposals i.) ii.) iii.) However it should be noted that implementation for item ii. will involved process / system work, with material extra effort and cost required if presentation of the information in graphic form is mandated. It should also be noted that presentation of graphics in colour, if required, can multiply bill production costs while slowing down bill production time; and that where the addition of graphics requires additional sheets to be included in bill envelopes this will result in extra weight and postage costs. Electric Ireland further believes that the use of graphics will drive further service costs through additional enquiries from customers. We suggest that the implications of delivering information in graphic form might be better examined further in the context of overall requirements for smart metering bills and statements.

Regarding item iv.) At this time Electric Ireland is in not in favour of providing 'comparisons with an average normalised or benchmarked final customer in

the same category'. The particular challenge here is to establish the composition of a normalised or benchmarked figure - where we believe that the inputs and parameters for such calculations can be very difficult to establish. In addition we believe it will raise a whole new area and quantities of queries from customers around the concept itself and the actual figures produced.

3. Proposed Requirement 3

Electric Ireland supports this proposal, though again pointing out that information overload on the bill itself may be an issue.

4. Proposed Requirement 4

Electric Ireland supports this proposal.

5. Proposed Requirement 5

Electric Ireland broadly supports the proposed amendments. However we suggest further consideration is merited in respect of credit refunds. We note in many instances that by the time the final bill issues the customer has moved on and has not provided us with a forwarding address. . As a result our experience is that many final accounts, follow on notifications and, where if applied, a cheque refund, will be returned to us with 'sender unknown' messages. There is an increased risk of fraud if we issue cheque refunds unprompted by customers that could end up in the hands of someone other than the intended recipient. In most such cases we would invite customers to make contact with us through a clear statement on the our final account, follow up notification and on our website on the process to follow in claiming the refund. The customer can then advise us on the most appropriate means of ensuring the refund gets to the correct recipient.

The process will be a little more difficult for customers on PAYG where there is likely to be a difference between the credit on the meter and the credit on the supplier record of account. The latter record will normally prevail leaving a potential credit for the incoming customer which they are not due. In this instance we suggest a separate industry workshop may be necessary to standardise operating arrangements between suppliers.

This process of course will be simpler for direct debit customers where a direct refund to a bank account is possible, normally following validation of the credit balance..

In all these circumstances and to allow reasonable flexibility in the means of making the refund we suggest a slight amendment in respect your proposed wording from 'The *bill / statement shall include information about any credit due to the customer and how this will be refunded*' to 'The *bill / statement*

shall include information about any credit due to the customer and how this can be refunded.

Question 20

Respondents are invited to comment on the proposed requirement. Do you agree with the introduction of this requirement and the proposed phrasing? Please outline reasons for agreement and disagreement.

Answer 20

Electric Ireland broadly supports this proposal. There is a need to clarify the mechanism by which a 'customer's own fuel mix' can be calculated and made available to customers

Question 21

Respondents are invited to comment on the following:

- i. Are additional requirements needed to regulate the amount that suppliers request customers to pay as security deposit for sign up or reconnection? Should these requirements be based on a specific model/formula or guidelines issued by the CER?
- ii. Should customers who opt to avail of a PAYG meter be required to pay a smaller security deposit or any security deposit at all?
- iii. Are there are other issues that we need to consider in relation to the security deposit?

Answer 21

- i.) Electric Ireland believes a deposit is appropriate where a direct debit is not provided by a customer or where the customer is not availing of a lifestyle PAYG meter. In the residential sector we believe the deposit requirement should be set at maximum of twice the actual average bill value or twice the actual estimated average bill value of €300.

In the business sector monetary risk is a material consideration and Electric Ireland does not believe it is appropriate to set guidelines. Suppliers will generally apply security requirements based on their own credit assessments and we believe this should continue to be the case.

- ii.) Electric Ireland does not favour the application of any deposit requirement for customers who avail of a PAYG meter.

Question 22

Respondents are invited to comment on the proposed requirement. Do you agree with the introduction of this requirement and the proposed phrasing? Please outline reasons for agreement and disagreement.

Answer 22

Electric Ireland supports the proposed wording.

Question 23

Respondents are invited to comment on the proposed requirement. Do you agree with the introduction of this requirement and the proposed phrasing? Please outline reasons for agreement and disagreement.

Answer 23

Electric Ireland supports the proposed requirement and wording.

Question 24

Respondents are invited to comment on the proposed amendments and new regulatory measures. Do you agree with the introduction of these amendments and new regulatory measures? Please outline reasons for agreement and disagreement.

Question 25

Respondents are further invited to comment on whether we should consider additional requirements for inclusion in this section. What should these requirements address and what is the most appropriate wording for such requirements?

Answer 24 and 25

Electric Ireland dual fuel processes treat gas and electricity accounts as separate accounts. We support the proposals as applicable to us. i.e. items ii.) and iii.)

Question 26

Respondents are invited to comment on whether principles, guidelines or regulatory measures are required for suppliers to comply with to ensure that they take customer's ability to pay into consideration in setting debt repayment arrangements. If yes, what should such requirements include? Please outline reasons for agreement and disagreement.

Question 27

Respondents are invited to comment on whether the current requirements of this section require updating. Should other requirements be considered for inclusion? Please provide arguments to substantiate your point of view.

Answer 26 and 27

In relation to customers ability to pay Electric Ireland believes that appropriate and rigorous measures are currently in place through the existing suppliers handbook requirements, supported strongly by the suppliers voluntary Energy Engage Code. We do not believe any further regulatory measures are required

Key to success in this area is customers willingness to engage, particularly at an early stage. We recognise that for various reasons some customers find it difficult to make a first contact or leave the contact until a large debt has built up and where disconnection is an emerging or only option for recovery of debt. (It should also be noted that some customers may engage but will not accept a PAYG meter as an option because of the commitment required to make regular payments.)

Suppliers have made firm, auditable commitments in this area through the Energy Engage Code including making proactive efforts to identify customers who show some early signs of difficulties. Disconnection figures have fallen significantly, and continue to fall, since the introduction of the voluntary Energy Engage Code.

Unfortunately some additional measures which we had expected would support stronger delivery in this area generally did not emerge in the CER Debt Management decision paper CER/16/014 and the resulting and continuing absence of appropriate debt management measures sends the wrong signals to those customers who deliberately won't pay (as against can't pay) for the energy they consume while also continuing to impose a burden on all customers (including those who can't pay) who then have to pick up the tab for the unrecovered or unrecoverable costs written off as bad debt. This is inherently unfair on those customers who make every effort to engage and to pay.

Electric Ireland continues to develop and maintain a wide range of relationships with appropriate advice / support agencies in this area. We work closely with them both in developing our thinking and policy; and in individual cases as brought to our attention or where we have mutual concerns to help any customer in difficulty.

Question 28

Do you agree with the proposed requirement? Please outline reasons for agreement and disagreement.

Answer 28

Electric Ireland agrees with the proposed requirement.

Question 29

Respondents are invited to comment on whether the current requirements of this Code necessitate updating. Are there additional requirements that we should consider for inclusion? Please provide reasons to substantiate your view point.

Answer 29

Electric Ireland strongly supports ongoing arrangements for delivery of an escalation service for customers who do not feel that their complaints have been adequately dealt with by suppliers. Our objective is always to minimise the number of such

complaints that reach CER for review and arbitration and we acknowledge that CER provide a fair and impartial service to customers in this respect.

Electric Ireland note that on occasion a complaint with multiple dimensions, over a prolonged period, requires resolution and in making a decision CER, correctly, apply, multiple and escalating penalties where there are findings against the supplier. However it is not always clear what the precise basis of the calculation of the penalty applied is. We would welcome some additional guidelines and clarity in relation to maximum penalties and / or escalation factors that can be applied in the event of adverse decisions, particularly where the decision imposes multiple penalties for identified multiple infringements.

Question 30

Do you agree with the proposed requirements? Are there additional requirements that we should consider for inclusion here? Please outline reasons for agreement and disagreement.

Answer 30

- i.) Electric Ireland strongly supports the proposed requirements.
- ii.) Electric Ireland supports reference to the Codes of Practice on bills/ statements and websites. We currently provide direct reference to the Vulnerable Code of Practice on or with our bills annually. However we do not think that it is necessary or useful to highlight the Vulnerable Code of Practice separately on every bill and / or statement (albeit this can be achieved much more easily on the website).

It should be noted that an overarching concern here is that, without infringing on our Universal Design obligations, the bills / statements are already overcrowded with information which makes it difficult for customers to identify key notices. Indeed, and notwithstanding legal obligations, it might be useful to review with customers, perhaps through the annual CER Customer Survey customers perspective on their awareness of the range of information / messaging provided on the bill and to seek insights on what customers consider an optimum amount of information / messaging that can be delivered effectively to the benefit of customers ?

Question 31

Respondents are invited to comment on whether additional requirements should be introduced for the sign up of vulnerable customers. If yes, what should these requirements provide for? Please outline reasons for agreement and disagreement.

Answer 31

Electric Ireland supports the provision of guidelines in relation to minimum standards to be applied in the sign up of vulnerable customers, allowing flexibility to suppliers in relation to additional measures that they feel could be additionally and usefully deployed in particular circumstances.

Question 32 Respondents are invited to comment on whether it is appropriate to use one registration form for the identification and registration of vulnerable customers, as required under S.I. 463 of 2011. Please outline reasons for agreement and disagreement. Respondents are further invited to comment on whether a standardised registration form or forms should be developed and used by all suppliers for the identification and registration of vulnerable customers.

Answer 32

Electric Ireland is satisfied that current arrangements in place deal with the requirements of SI 463 OF 2011.

We do not believe that there is any particular advantage to standardising the registration form for identification and registration of vulnerable customers.

Question 33

Respondents are invited to comment on the proposed requirement. Do you agree with the introduction of this requirement and the proposed phrasing? Please outline reasons for agreement and disagreement.

Answer 33

Electric Ireland supports this proposal.

Question 34

Respondents are invited to comment on the proposed requirement. Do you agree with the introduction of this requirement and the proposed phrasing? Please outline reasons for agreement and disagreement.

Answer 34

Electric Ireland supports this proposal.

Question 35

Respondents are invited to comment on whether additional requirements should be introduced to ascertain the status of vulnerable customers and ensure that they are registered on the appropriate register. If yes, what should these requirements provide for? Please outline reasons for agreement and disagreement.

Answer 35

Electric Ireland supports this proposal.

We believe that a notification to registered vulnerable customers (or their representatives) once per year would be adequate. The notification / reminder would seek confirmation in relation to information already held; and if any change in circumstances warranted an amendment to details already on our records. An appropriate template, with clear, simple instructions for completion, to assist the customer could be designed, highlighting the purpose of the notification. Where the communication is by letter a freepost envelope could be provided for responses.

Question 36

Respondents are invited to comment on whether principles, guidelines or regulatory measures are required to ensure consistency in the criteria used by suppliers to assess suitability of PAYG meters for vulnerable customers.

Answer 36

Electric Ireland supports the provision by CER of minimum standard guidelines to ensure consistency in the criteria used by suppliers to assess suitability of PAYG meters for vulnerable customers. We further support a requirement for the retention of such a record.

Question 37

Respondents are invited to comment on whether specific regulatory measures should be introduced to ensure **continuous** assessment of suitability of PAYG meters for vulnerable customers (i.e. post sign up). What should these regulatory measures involve? Please outline reasons for agreement and disagreement.

Answer 37

Electric Ireland do not favour provision of specific regulatory measures to ensure the continuous assessment of suitability of PAYG meters for vulnerable customers post sign up. It would seem to us to be illogical to conduct a suitability survey, as proposed and supported elsewhere, and - having established that it was unsuitable for a customer and where the customer chooses to take a PAYG meter anyway, exercising their own free choice – to disregard that outcome and establish a responsibility on us as a supplier to essentially monitor the health and wellbeing of a customer on an ongoing basis. We do not believe that this is a function of an energy supplier.

Question 38

Respondents are invited to comment on the proposed requirement. Do you agree with the introduction of such a requirement? Is the requirement formulated appropriately? Please outline reasons for agreement and disagreement.

Answer 38

Electric Ireland supports the proposal to implement a process of communication with vulnerable customers who do not top-up regularly.

Question 39

Respondents are invited to comment on whether the current requirements of this Code necessitate updating. Are there additional requirements that we should consider for inclusion? Please provide reasons to substantiate your view point.

Answer 39

Electric Ireland has no further comments at this stage.

Question 40

Do you agree with the introduction of the proposed requirement? Please outline reasons for agreement and disagreement.

Answer 40

Electric Ireland supports the introduction of this requirement. We believe it will bring clarity and certainty for customers. We also believe that additional clarity would be useful if the key range of 'actions / interactions' proposed were to be set out more specifically so as to leave no doubt about what is intended by this provision. Specifically we favour the following actions to be indicated clearly

- Customers who intend to switch from a PAYG company to contact their supplier for a deactivation code.
- Customers should be advised to run down any credit on their PAYG meter before contacting their supplier for a deactivation code.
- The deactivation code should be given by the supplier upon request and no 'Save' activity should happen at this point.

Question 41

Do you agree with the introduction of the proposed requirement and the associated method of implementation as outlined above? Please outline reasons for agreement and disagreement.

Answer 41

Electric Ireland support this proposal though we acknowledge that linking the deactivation code to the market message through changes to the retail market design could result in a costly implementation and inevitable delays as the changes

to the market design are processed through to approval and implementation. We suggest therefore that it might be worthwhile for CER to apply interim measures to achieve similar outcomes in the interest of transparency and clarity for customers; and to ensure the reputation of the market is sustained.

We further believe, for the absence of doubt, that the installation of a PAYG meter should not occur prior to the market message being received by the original supplier, including where the acquisition involves a customer who does not already have a PAYG meter.

Question 42

Do you agree with the introduction of the proposed requirement? Please outline reasons for agreement and disagreement.

Answer 42

Electric Ireland wishes to comply with the Energy Efficiency Directive in relation to frequency and content of bills / statements. Extensive work has been done within the industry over the past few years in developing energy statements that reflect best intentions in this respect, given the key differences that exist in the PAYG area as against the more common two monthly credit meter billing. (For example where customers are prepaying for their energy usage with PAYG and there is a continuous misalignment between the balances in the PAYG meter which decrements dynamically as usage occurs and vends are captured as against the two monthly billing systems more commonly used for credit meter customers.) There are material differences and challenges in a supplier's capability to deliver information of the quality as proposed in the consultation for an amended section 9.2.1 (c). We believe that a detailed industry wide review of current arrangements should be considered to establish any additional parameters required (if any) under the Energy Efficiency Directive that would pragmatically deliver a solution in this area. It should also be borne in mind that current billing arrangements being proposed for Smart Meters, involving nightly billing, could largely solve the misalignment problem, providing a more appropriate platform to deal with any gaps that might still exist in terms of information provision.

Question 43

Respondents are invited to comment on whether the current requirements of this Code necessitate updating. Are there additional requirements that we should consider for inclusion? Please provide reasons to substantiate your view point.

Answer 43

Electric Ireland has no further comments at this stage on whether additional requirements should be considered for inclusion in the code. Customers with

Smarter PAYG meters will have access to their historical consumption and payments on their In Home Display – or on the web, rendering paper statements unnecessary.

Question 44

Do you agree with the introduction of the proposed requirement? Are there other requirements that we should consider for inclusion in this section? Please outline reasons for agreement and disagreement.

Answer 44

Electric Ireland supports this proposal.

Question 45

Do you agree with the introduction of the proposed requirement? Are there other requirements that we should consider for inclusion in this section? Please outline reasons for agreement and disagreement.

Answer 45

The additional requirements will potentially add very significant ongoing customer notification costs, primarily through additional postage. The proposal of itself seems excessive for example in a mass price change scenario where we can currently provide notification to in excess of a million customers through mass media adverts / coverage and where the change itself is highlighted to customers as it is being applied to bills. The scale of the impact is such that we will have probably had to anticipate level of costs from applying the price change into the price change itself.

More flexible options need to be applied to allow for pragmatic and sensible customer outcomes. One such option might be to allow for the written 30 days notification in advance or for notification on the customer bills, (possibly with change of mind / withdrawal allowed by customers for 30 days after the date of the latest bill, with application from the date of the price increase.

Question 46

Do you agree with the introduction of the proposed requirement? Please outline reasons for agreement and disagreement.

Answer 46

Electric Ireland supports this proposal. We suggest further that the proposal might benefit from amendments to set out more precisely what is intended by certain terms, for example ‘undue delay’; and ‘ unduly complex complaints handling processes’

Question 47

Respondents are invited to comment on whether there other requirements that we should consider for inclusion in this section? Please provide rationale to substantiate your view point.

Answer 47

We have no additional proposals that this point.