

Electric Ireland Response

CER Supplier Handbook and Further Consultation. CER /16/287

Attention : Dana Parachiv

Date : 2/12/2016

Dear Dana,

Electric Ireland welcomes the opportunity to comment on the Suppliers Handbook Decision and further consultation. We recognise that reaching this stage of the process has been a complex challenge, particularly given the scope of the matters under consideration.

We have taken the questions as set out in the consultation and in the order presented and our responses to each question are set out in the attached document.

In summary -

- Electric Ireland supports the introduction of the Estimated Annual Bill. We have acknowledged the challenges that customers face when entering fixed term (usually one year) contracts and the uncertainty that may exist as the customer contract expires. Our customer offers (including to existing customers) now provide for long term value through discounts that do not expire after one year but will be allowed to customers as long as they remain with us. It is important that this change in the competition model is recognised in framing and interpreting the new suppliers handbook. In particular it is worth noting that we have moved away from the one year deep discount model with a view to offering all qualifying benefits to customers over the long term.
- Electric Ireland welcomes the introduction of the 30 day notice and we have commented on the proposed content. We believe that with the introduction of long term, multi-year discounts and value to customers by Electric Ireland that an important difference of interpretation needs to be applied as against those customers who are on fixed term contracts with a defined expiry term.
- We welcome the introduction of the Annual Prompt but we have requested that further consideration is required on the definition of what 'no engagement' means.
- We support and welcome the changes to the supplier handbook in respect of customers ability to pay and note the they align well with the existing Engage Code.

We understand that a further workshop will be held to discuss certain matters arising from this consultation and the draft suppliers handbook itself and welcome this as a means of providing further clarification in an area which is central to how the retail. market operates.

Finally we have examined the draft Electricity and Gas Suppliers Handbook and note that necessary adjustments have been made to reflect new requirements and updates. These changes, when finalised, will require further consideration in terms of the resource needed for implementation and the timeline for delivery. Notwithstanding this, and while we have observed areas in which further arbitration by CER in respect of precise meaning may be required in due course, we acknowledge that it is a difficult task to try to anticipate every circumstance in a dynamic and competitive market. We trust therefore that pragmatism and a mature, flexible deployment by all stakeholders of the processes and principles as set out and intended will contribute well to the delivery of best customer outcomes in an evolving energy market.

Regards,

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